



DEPARTMENT OF THE NAVY  
NAVAL SURFACE WARFARE CENTER  
PANAMA CITY DIVISION  
110 VERNON AVENUE  
PANAMA CITY, FL 32407-7001

IN REPLY REFER TO:  
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22 Sep 23

MEMORANDUM

From: Commanding Officer, Naval Surface Warfare Center, Panama City Division

Subj: COMMAND REASONABLE ACCOMMODATION POLICY FOR INDIVIDUALS  
WITH DISABILITIES

Ref: (a) 29 CFR 1614  
(b) EEOC Management Directive 110  
(c) EEOC Management Directive 715  
(d) Rehabilitation Act of 1973

Encl: Command Personal Assistance Services Procedures

1. As your Commanding Officer, Naval Surface Warfare Center, Panama City Division (NSWC PCD), I am committed to fully complying with the reasonable accommodation (RA) requirements set forth by the Department of the Navy (DON). Per references (a) through (d), I ensure NSWC PCD is adhering to applicable federal laws, regulations, and guidelines with respect to providing reasonable accommodations to afford Equal Employment Opportunity (EEO) to qualified individuals with disabilities.
2. Federal agencies are required to provide reasonable accommodation to employees and applicants that meet the criteria of a qualified disabled employee unless the agency can show that the accommodation that has been requested would result in undue hardship to NSWC PCD or the DON.
3. A person with a disability is someone who has a physical or mental impairment that materially or substantially limits one or more major life activities such as seeing, hearing, speaking, walking, breathing, performing manual tasks, learning, caring for oneself, and working. While many individuals with disabilities can work without accommodation, other qualified applicants and employees face barriers to employment in the absence of the accommodation process. An employee with a disability in need of an accommodation should inform his or her supervisor once there is a known workplace barrier preventing effective competition for a position, performance of a job, or gaining of equal access to a benefit of employment due to disability.
4. The reasonable accommodation process begins as soon as the employee makes the request for accommodation. A reasonable Accommodation (RA) is any modification or adjustment to a job application process, the work environment, or the manner or circumstances under which work is customarily performed that enables a qualified individual with a disability to perform the

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essential functions of a position, or to enjoy equal benefits and privileges of employment as are enjoyed by similarly situated individuals without a disability.

5. A flexible, interactive process involving the qualified individual with a disability and agency officials will be used to identify the appropriate reasonable accommodation. All reasonable accommodation requests should be processed generally within 45 days of the initial request.

6. To adhere to the DON policy and procedures, the administration of the reasonable accommodation process resides within and is managed by the EEO office. The RA Program Manager is Katelyn Arnold who can be contacted at [Katelyn.n.arnold2.civ@us.navy.mil](mailto:Katelyn.n.arnold2.civ@us.navy.mil) or (850) 896-8592.

7. Procedures and Responsibilities

a. All NSWC PCD employees shall be responsible for:

(1) Becoming familiar with the provisions of this policy, complying with all the requirements of this policy, and cooperating with any inquiry carried out under this policy.

(2) Participating in reasonable accommodation training.

(3) Promptly reporting any behavior they view as harassing, degrading, or retaliation because of a request for reasonable accommodation; or any attempt to discourage their request for reasonable accommodation, their supervisor or someone in the chain of command before the behavior becomes severe or pervasive as to constitute a hostile environment.

b. All NSWC PCD managers and supervisors shall be responsible for:

(1) Respond to RA requests in accordance with the procedures and timeframes outlined in this Program Manual, including promptly responding to communications regarding the request, and issuing RA decisions to the employee or applicant for employment.

(2) Maintain an open line of communication with the employee seeking an accommodation and engage in ongoing, informal discussions with the employee during the RA process.

(3) Consider the use of Alternative Dispute Resolution (ADR) techniques at any stage in the RA process to resolve any conflicts at the lowest level.

(4) Maintain confidentiality of medical information obtained in connection with the RA process.

c. The Deputy Director EEO, Diversity & Inclusion shall be responsible for:

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(1) Publicizing and implementing DON's policy for the processing of reasonable accommodation requests at the activity.

(2) Designating a RA POC, who has a sufficient level of training and expertise on reasonable accommodation, in the EEO Office for RA requests.

(3) Ensuring that all individuals responsible for the processing of reasonable accommodation requests at serviced activities are trained on program requirements, to include relevant legal principles/precedents.

(4) Ensuring that all reasonable accommodation requests are processed in a timely and consistent manner.

(5) Establishing and maintaining a tracking and monitoring system for reasonable accommodation requests.

(6) Providing EEO training to supervisors, to include the procedures for requesting reasonable accommodation.

(7) Assisting the Human Resources Office (HRO) and command counsel in providing advice and guidance to the Commanding Officer when the activity level job search fails to identify any vacant positions for placement of an employee who cannot be accommodated in his/her position of record.

(8) Assisting the HRO and command counsel in providing advice and guidance to the Commanding Officer when an individual, who is not a current employee at the activity, cannot be placed in one or more of the activity's vacant positions identified in the job search conducted by the Human Resource Service Center.

(9) Submitting reports on reasonable accommodation procedures as required by DON or major command.

(10) Monitoring confidentiality of the process and records and retaining all reasonable accommodation case files for serviced activities.

d. The Reasonable Accommodation point of contact shall be responsible for:

(1) Coordinating all reasonable accommodation requests.

(2) Ensuring that all reasonable accommodation requests are processed in accordance with the provisions of CHRM 1606.

(3) Involving appropriate personnel or the Advisory Team who provide recommendations to the supervisor/manager responsible for deciding on a request for reasonable accommodation.

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(4) Ensuring that the supervisor engages in ongoing, informal interactive discussion(s) with the individual seeking an accommodation.

(5) Updating the appropriate tracking and monitoring system for reasonable accommodation requests.

(6) Maintaining all reasonable accommodation case files in a secure manner.

(7) Safeguarding the confidentiality of medical information. Access to this information will be granted on a strictly limited basis.

8. If an employee believes their supervisor has failed to accommodate them, failed to address their reasonable accommodation request, or denied their reasonable accommodation request to discriminate, they may initiate the EEO complaint process within 45 calendar days by contacting the EEO office at (850) 234-4577.

9. If a need for a reasonable accommodation arises, please contact Ms. Arnold at (850) 896-8592. All questions regarding this policy should be referred to the Deputy Director, Equal Employment Opportunity, Diversity and Inclusion at (850) 771-8501.

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Distribution:  
All Hands, NSWC PCD