

DIRECTIVE

SUBJECT: Reasonable Accommodations	DIRECTIVE NUMBER: OIG-2017-007
DISTRIBUTION: All Employees	DATE ISSUED: November 30, 2017

I. Purpose

This Directive establishes procedures for processing requests for reasonable accommodations based on a disability as defined in this Directive. The Department of Homeland Security (DHS) Office of Inspector General (OIG) is committed to providing reasonable accommodation to employees and applicants to ensure that individuals with disabilities enjoy full access to equal employment opportunities.

II. Scope

This Directive applies to all OIG employees and applicants for employment with the OIG.

III. Authorities

- A. The Rehabilitation Act of 1973, P.L. 93-112, 29 U.S.C. § 701 *et seq.*
- B. The Americans with Disabilities Act Amendments Act of 2008, P.L. 110-325
- C. Executive Order 13164 (July 2005)
- D. 29 C.F.R. Parts 1614 and 1630
- E. EEOC Management Directive 715 (2003)
- F. DHS Directive 259-01, “Providing Reasonable Accommodations for Employees and Applicants with Disabilities”

- G. DHS Directive 259-01-001, “Instruction on Providing Reasonable Accommodations for Employees and Applicants with Disabilities”
- H. OIG Directive 72-3, “Leave Administration” and Appendix A, “Leave Administration Handbook”

IV. Definitions

- A. **Benefits and Privileges of Employment.** Benefits and privileges of employment include, but are not limited to, employer-sponsored training, services (*e.g.*, employee assistance programs, credit unions, cafeterias, lounges, gymnasiums, auditoriums, transportation) and parties or other social functions.
- B. **Disability.** A physical or mental impairment that substantially limits one or more major life activities of an individual; a record of such an impairment; or being regarded as having such an impairment.
- C. **Effective Accommodation.** An accommodation is effective if it would remove a workplace barrier, thereby providing an individual with an equal opportunity to apply for a position, perform the essential functions of a position, or gain equal access to a benefit or privilege of employment.
- D. **Essential Functions.** The fundamental job duties of the employment position the individual with a disability holds or desires, which do not include marginal functions. The individual must be able to perform the essential functions, with or without reasonable accommodation, in order to be considered qualified for the position. For example, the position description for an auditor includes the essential functions of formulating and executing audit programs; participating in audits and reviews on site at various locations; gathering, analyzing, and summarizing information; and preparing audit reports.
- E. **Impairment.** An impairment is a disability if it substantially limits an individual’s ability to perform a major life activity as compared to most people in the general population. An impairment can be physical or mental and does not need to be permanent to qualify as a disability. However, an impairment that lasts or is expected to last fewer than six months and also has a minor effect on the individual’s major life activities does not qualify as a disability.
- F. **Major Life Activities.** Major life activities include, but are not limited to: (1) caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, sitting, reaching, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking,

communicating, interacting with others, and working; and (2) the operation of a major bodily function.

- G. **Qualified Individual with a Disability.** An individual who satisfies the requisite skill, experience, education, and other job-related requirements of an employment position and who can, with or without reasonable accommodation, perform the essential functions of that position.
- H. **Reasonable Accommodation.** An adjustment that enables an individual with a disability to perform the essential functions of their position or to enjoy equal benefits and privileges of employment as are enjoyed by other similarly situated employees without disabilities.
- I. **Temporary Impairment.** An impairment that lasts or is expected to last for a short period of time (*e.g.*, shorter than six months) may qualify as a disability if it is sufficiently severe. For example, a severe injury may qualify as a disability if it substantially limits one or more major life activities of an individual.
- J. **Workplace Barriers.** Physical obstacles (such as inaccessible facilities or equipment) or procedures or rules (such as when work is performed, how breaks are taken, or how essential or marginal functions are performed) that keep individuals with disabilities from performing jobs which they could do with some form of accommodation.

V. Policy

- A. Under the Rehabilitation Act of 1973, the OIG must provide reasonable accommodation to qualified individuals with disabilities, unless doing so would cause undue hardship. The OIG is committed to providing reasonable accommodations to employees and applicants to ensure that individuals with disabilities enjoy equal access to all employment opportunities.
- B. The OIG will process reasonable accommodation requests, and provide reasonable accommodations where appropriate, in a prompt and efficient manner within the time frames set forth in this Directive.
- C. This Directive should be read in conjunction with the Leave Administration Directive and the Leave Administration Handbook. An employee who is unable to perform his/her duties for reasons such as physical or mental illness, injury, pregnancy, or childbirth should follow appropriate procedures for leave requests.

- D. All requests for reasonable accommodation will be processed and administered by the OIG's Human Resources Management Division (HRMD) and will be subject to a joint review by HRMD and the OIG Office of Counsel (OC).

VI. Procedures

A. Requesting a Reasonable Accommodation

1. **Eligibility.** An employee or job applicant with a disability may initiate a request for reasonable accommodation.
2. **Making the Request.** An employee or applicant may request a reasonable accommodation orally or in writing. Although the request does not have to be made in a particular format, the *Reasonable Accommodation Request Intake Form* (Intake Form) is available and will be used to confirm receipt of a request. (See Appendix A).

Additional resources for reasonable accommodations, including the EEOC website and information on assistive technology, can be found in Appendix B.

3. **Submission by a Third Party.** Another individual, such as a family member, health professional, or friend, may request a reasonable accommodation on behalf of an employee or applicant with a disability.
4. **Substance of the Request.** A request for reasonable accommodation must state that the employee or applicant needs an adjustment or change at work for a reason related to a medical condition. Although the request need not state that the medical condition is a "disability" or that the individual is requesting a "reasonable accommodation," it should be understood that a reasonable accommodation will only be provided to a qualified individual with a disability.
5. **Requests for Repeated Accommodation of the Same Type.** If a reasonable accommodation will be needed on a repeated basis, such as a sign language interpreter, an employee need only submit the Intake Form once.
6. **Recipient of the Request.** An employee may submit a request to **OIG.ReasonableAccommodations@oig.dhs.gov**. Alternatively, an employee may submit a request to his/her direct supervisor,

second-level supervisor, or the designated Reasonable Accommodations Specialist in HRMD.

7. **Processing by the Human Resources Division and Office of Counsel.** Any supervisor, manager, or other employee who receives a request for reasonable accommodation must notify the designated Reasonable Accommodations Specialist and designated Reasonable Accommodations Coordinator in the OC at **OIG.ReasonableAccommodations@oig.dhs.gov** by close of business **on the next business day** after receiving a request for reasonable accommodation.¹

Together, HRMD and the OC are responsible for:

- Reviewing and issuing a decision on each request,
 - Ensuring fair and consistent application of this Directive,
 - Ensuring timely processing and tracking of reasonable accommodation requests, and
 - Coordinating with additional personnel as necessary to accommodate a request (*e.g.*, to order assistive technology or remove architectural barriers).
8. **Mutual Sharing of Information.** The processing of a reasonable accommodation request involves a mutual sharing of information and ideas between the requesting individual and HRMD in consultation with the OC, referred to as an “interactive process.” This process is described in the next section below.

B. **Interactive Process**

1. **Prompt Processing.** Pursuant to the Rehabilitation Act, the OIG will begin processing a reasonable accommodation request as soon as the request is made, notwithstanding whether the request is made orally or in writing, or whether the individual has submitted sufficient information to enable HRMD and the OC to evaluate the request.

For each reasonable accommodation request, the designated Reasonable Accommodations Specialist will complete an Intake Form, which s/he will save in a Reasonable Accommodations

¹ If the supervisor, manager, or other employee is on leave or in travel status at the time of receipt, this time period starts running as of the day they are back on duty in non-travel status.

folder. Access to that folder will be limited to HRMD and OC personnel with a need to know.

2. **Confirmation of the Request.** HRMD will confirm receipt of a reasonable accommodation request, in writing, by close of business **on the next business day** after receiving a request for reasonable accommodation.

When a third party (such as a doctor or family member) requests accommodation on behalf of an employee or applicant, HRMD should, if possible, confirm with the employee or applicant that s/he wants a reasonable accommodation before proceeding. If this is not possible, for example, because the employee has been hospitalized temporarily in an acute condition, HRMD will process the third party's request if it seems appropriate (*e.g.*, by granting immediate leave) and will consult directly with the individual needing the accommodation as soon as practicable.

3. Identifying the Appropriate Accommodation

- a. Once HRMD receives the request, the designated Reasonable Accommodations Specialist, in consultation with the OC, will engage in an informal process with the requester to clarify what s/he needs and identify the appropriate reasonable accommodation. HRMD may ask the requester relevant questions that will facilitate an informed decision about the request, such as:
 - What is the nature of the disability,
 - What type of reasonable accommodation does s/he need, or
 - What are his/her functional limitations (*i.e.*, what are the problems posed by the workplace barrier)
- b. In some cases, the nature of the disability and the requester's functional limitations may not be obvious, or there may be more than one possible accommodation, so HRMD may need to ask questions in order to identify an effective accommodation. HRMD should include the requester's supervisor in the discussion concerning the essential functions of the requester's position and the effectiveness of an accommodation.
- c. As part of the interactive process, the OIG may offer alternative suggestions for reasonable accommodations and discuss their effectiveness in removing the workplace barrier that is impeding the individual with a disability. Additionally, as part of this process, the OIG may request that the employee be assessed by

a third party for an appropriate accommodation. The individual may express his/her preference for a particular accommodation; however, the OIG has the ultimate discretion to choose among effective accommodations.

4. **Reassignment.** If through the interactive process, HRMD in consultation with the OC determines that an employee is not qualified for his/her position because there is no accommodation that will allow him/her to perform the essential functions of the position, then the OIG will consider non-competitive reassignment to a vacant, funded position. If there is no vacant, equivalent position for which the individual is qualified with or without reasonable accommodation, then the OIG may reassign an employee to a lower graded position. Reassignment is not available to applicants.

C. **Requests for Medical Information**

1. **Need for Medical Information.** The OIG is entitled to request medical information (including documentation) when a disability and/or need for accommodation are not obvious (*e.g.*, the requester is blind or has paraplegia) or already known to the OIG (*e.g.*, the requestor previously asked for an accommodation and information submitted at that time showed a disability existed and that there would be no change in the individual's medical condition).

The OIG's need for medical information is limited to establishing that: (a) the individual has a disability, (b) the individual needs a reasonable accommodation, and (c) the accommodation is effective.

HRMD will obtain the OC's concurrence before requesting medical information from an employee or applicant. HRMD and the OC will maintain the requester's medical information in the restricted access Reasonable Accommodations folder.

2. **The Requestor's Obligations.** When the designated Reasonable Accommodations Specialist asks the requester to provide medical information to establish the existence of a disability and/or need for accommodation, the requester is responsible for obtaining the information and providing it to the designated reasonable accommodations personnel in HRMD and the OC at **OIG.ReasonableAccommodations@oig.dhs.gov**. If the individual has already submitted medical documentation to the OIG in connection with a previous request for accommodation, s/he should inform HRMD of this fact. In consultation with the OC,

HRMD will then determine whether additional medical information is needed to process the current request.

3. **Types of Medical Information or Documentation.** Under appropriate circumstances, the OIG may request information or documentation regarding:
 - a. The nature, severity, and duration of the individual's impairment.
 - b. The activity(s) that the impairment limits.
 - c. The extent to which the impairment limits the individual's ability to perform the activity(s).
 - d. Why the individual requires reasonable accommodation or, if the individual identifies a specific reasonable accommodation, why it will be effective.
 - e. How the requested reasonable accommodation will enable the requester to apply for a job, perform the essential functions of the job, or enjoy a benefit of the workplace.
4. **Appropriate Professional.** The OIG may require that the documentation about the disability and functional limitations come from an appropriate health care or rehabilitation professional. The appropriate professional in any particular situation will depend on the disability and the type of functional limitation it imposes. Appropriate professionals include but are not limited to doctors (including psychiatrists and other specialists), psychologists, nurses, physical therapists, occupational therapists, speech therapists, vocational rehabilitation specialists, and licensed mental health professionals.
5. **Sufficiency of Medical Information.** In consultation with the OC, HRMD will assess the medical information provided to determine whether it sufficiently establishes that the individual has a disability and/or that an accommodation is needed. If the medical information is insufficient to establish the existence of a disability and/or need for an accommodation, then HRMD will explain what additional information is needed. Thereafter, the individual is responsible for obtaining the requested information from the appropriate provider.
6. **Review by OIG-Consulted Doctor.** As necessary, the OIG may obtain a doctor's review of medical information to determine whether a disability exists and/or accommodation is needed. Such

review will be performed by a doctor of the OIG's choosing, at the OIG's expense.

7. **Limits on Medical Information Requests.** The OIG may only require the documentation that is needed to establish that a person has a disability under the Rehabilitation Act, and that the disability necessitates a reasonable accommodation. In any case when HRMD believes medical information is necessary to verify the existence of a disability and the need for a reasonable accommodation, HRMD will consult with the OC to ensure the OIG's request is within the limits of the Act.

D. **Confidentiality Requirements**

1. In confidential Reasonable Accommodation files separate from the individual's personnel file, the OIG will maintain all medical information obtained in connection with a request for reasonable accommodation. This includes the fact that an accommodation has been requested or approved and information about functional limitations. Any OIG employee who obtains or receives such information is strictly bound by these confidentiality requirements.
2. HRMD and the OC may share certain information with an employee's supervisor or other agency official(s) as necessary to make appropriate determinations on a reasonable accommodation request. **Under these circumstances, HRMD will inform the recipients about these confidentiality requirements.** The information disclosed will be no more than is necessary to process the request.

E. **Time Frame for Processing Requests and Providing Reasonable Accommodations**

1. The time frame for processing a request for reasonable accommodation (including providing accommodation, if approved) is **as soon as possible** but no later than **30 business days from the date the request is made**. Failure to process the request in the most expeditious manner possible may result in a violation of the Rehabilitation Act. When extenuating circumstances are present (*e.g.*, events that are not reasonably foreseeable or avoidable, or are beyond the OIG's ability to control), the time for processing a request and providing the accommodation will be extended as reasonably necessary.
2. **Tracking the Request.** Employees and applicants can request a status update by emailing the OIG Reasonable Accommodations

box at **OIG.ReasonableAccommodations@oig.dhs.gov**. The subject line should contain the phrase “tracking request” or “status update request.” Additionally, the body of the email should reference the employee or applicant’s name and the date of the accommodation request.

3. If HRMD asks a requester to submit medical information from an appropriate health care or rehabilitation professional, the processing period will be paused until the requester provides sufficient medical information to allow for a determination of disability and/or the need for accommodation.
4. **Extensions.** In extenuating circumstances (those that could not reasonably have been anticipated or avoided in advance of the request for accommodation or that are beyond the OIG’s ability to control), there may be an extension of the time involved in processing a request or providing a reasonable accommodation. With the OC’s concurrence to the extension, HRMD must notify the individual in writing of the reason for any delay in processing the request or providing reasonable accommodation, including any extenuating circumstances that justify the delay.
5. **Temporary Measures.** In certain circumstances, the OIG may provide accommodation on a temporary, provisional, or trial basis. The OIG may grant such accommodation while considering a request for accommodation, determining whether an accommodation is effective, or while waiting to be able to implement an approved accommodation. When providing an accommodation on a temporary basis, HRMD must advise the employee or applicant, in writing, that the accommodation is temporary and provisional. HRMD must also specify that the temporary accommodation will expire. To the extent possible, HRMD will specify when the temporary accommodation will expire, whether on a specific date or, for example, after the installation of appropriate assistive technology.

F. **Telework as a Reasonable Accommodation**

1. In some cases, telework may be an effective accommodation. An employee may work from home or another approved remote location only to the extent that his/her disability necessitates it.
2. Telework is not an appropriate accommodation when an essential function of the employee’s job cannot be performed from home or another approved remote location.

G. **Resolution of the Reasonable Accommodation Request**

1. **Written Decision.** All decisions regarding a request for reasonable accommodation will be communicated to the employee or applicant in writing using the Intake Form.
2. **Grant of an Accommodation.** If the OIG grants a request for accommodation, HRMD will discuss implementation of the accommodation with the individual. A decision to provide an effective accommodation other than the one the individual specifically requested is within the OIG's discretion. In such a case, the OIG's grant of an alternative accommodation will be considered a decision to grant the accommodation.
3. **Denial of an Accommodation.** If the OIG denies a request for accommodation, HRMD will clearly state in writing the specific reason(s) for the denial and provide notice of the individual's appeal rights. Before the OIG can deny an accommodation request, HRMD must submit the draft denial to the OC for review. Reasons for which the OIG may deny a request for accommodation include, but are not limited to, the following:
 - The requester is not a qualified individual with a disability.
 - The requested accommodation will:
 - Require altering the essential functions of the job.
 - Not be effective.
 - Not adequately eliminate or minimize the risk of harm to the individual or to others.
 - Result in undue hardship for the OIG. Factors that the OIG may consider in assessing undue hardship include the overall size of the program office with respect to number of employees; the type and number of facilities; size of the budget; the type of agency operation, composition, and structure of the agency's workforce; and the nature and cost of the accommodation.
 - The requested accommodation was denied and alternative accommodations considered were ineffective.

H. **Request for Reconsideration or Appeal**

1. An individual dissatisfied with the resolution of a reasonable accommodation request can ask the Director of HRMD to reconsider the decision.
2. The request for reconsideration must be submitted **within 10 business days** of receiving the written notice of decision. The Director of HRMD will respond to this request **within 10 business days** of receiving the request for reconsideration.
3. A request for reconsideration to the HRMD will not extend the time limits for initiating an Equal Employment Opportunity (EEO) or Merit Systems Protection Board (MSPB) appeal. An individual who wishes to pursue those remedies for denial of reasonable accommodation **must**:
 - For an EEO complaint: contact an EEO counselor in the DHS Headquarters EEO Office at hqeeo@hq.dhs.gov or (202) 357-7700 **within 45 days** from the date of receipt of the written decision or a verbal response to the request (whichever comes first).
 - For adverse actions over which the MSPB has jurisdiction: initiate an appeal to the MSPB **within 30 days** of an appealable adverse action as defined in 5 C.F.R. § 1201.3.

VII. **Responsibilities**

A. **The Deputy Inspector General, Assistant Inspectors General (AIGs), and Counsel** will:

1. Ensure that managers and supervisors under their direction are fully aware of and adhere to this Directive.
2. As applicable, review all denials of accommodation.

B. **Managers and Supervisors** will:

1. Submit requests from employees and applicants for a reasonable accommodation to **OIG.ReasonableAccommodations@oig.dhs.gov** by close of business **on the next business day** after receiving a request for reasonable accommodation.

2. Consult with HRMD and OC when an employee or applicant indicates that a physical or mental impairment limits a major life activity.
3. Consult with HRMD and OC when an employee or applicant's physical or mental impairment poses a threat to the individual or others.
4. Coordinate with HRMD and OC concerning the essential functions of the position at issue and the effectiveness of the accommodation whether the requester is fulfilling them.

C. The **Human Resources Division** and **Office of Counsel** will:

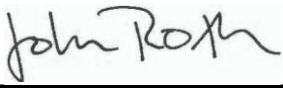
1. Advise and guide employees and supervisors on their responsibilities under this Directive.
2. Ensure fair and consistent application of this Directive.
3. Ensure timely processing and tracking of reasonable accommodation requests.
4. Identify whether medical information is needed and may be requested from an individual.
5. Maintain reasonable accommodation materials, including the Intake Form, any other records of the initial request and decision, and medical information, in files separate from personnel files and with access restricted to HRMD and OC personnel with a need to know.
6. Coordinate with additional personnel as necessary to accommodate a request (*e.g.*, to order assistive technology or remove architectural barriers).

D. **Employees** and **Applicants** will:

1. Submit reasonable accommodation requests consistent with this Directive, which will be available to employees and applicants on the OIG's public website.
2. Cooperate with requests for medical information.
3. Give appropriate advance notice each time s/he needs a reasonable accommodation on a recurring basis, such as the assistance of a sign language interpreter.

VIII. Questions

For questions about this Directive, please contact the OIG's Human Resources Management Division (HRMD) or the OIG Office of Counsel.

APPROVED BY: 

John Roth
Inspector General

Appendix A

REASONABLE ACCOMMODATION REQUEST INTAKE FORM

The Office of Inspector General (OIG) encourages use of this form by individuals requesting the reasonable accommodation of a qualified disability. Use of this form is not mandatory in order to request an accommodation but will assist the OIG in completing review of the request.

Please direct any questions about completion of this form, including requests for alternative formats accessible to people with disabilities, to the designated Reasonable Accommodations Specialist in HRMD or to the OIG Reasonable Accommodations inbox **OIG.ReasonableAccommodations@oig.dhs.gov**.

Section A. For Applicant or Employee Use

Complete items 1-10 and return this form to **OIG.ReasonableAccommodations@oig.dhs.gov**.

1. _____
Applicant's/Employee's Name _____
Date of Request

2. _____ 3. _____
Applicant's/Employee's Telephone Number Program Office and Location

4. _____ _____
Name of Requester (if other than Applicant/Employee) Telephone Number

5. _____
Supervisor's Name _____ _____
Telephone Number Location

6. Disability/Condition for which accommodation is requested

7. Type of accommodation requested, if known. Be as specific as possible, *e.g.*, assistive technology, reader, interpreter, schedule change.

8. Reason for request as it relates to being a barrier to work or the workplace. *For example, "I'm having trouble getting to work at my scheduled starting time because of medical treatments I'm undergoing." "I need six weeks off to get treatment for a back problem." "My wheelchair cannot fit under the desk in my office."*

9. If accommodation is time sensitive, please explain:

10. Is this accommodation one you will need on a recurring basis?

Yes

No

If yes, please explain: _____

Section B. For HRMD/OC Use Only

1. Tracking

Date Request Received: _____

Date Confirmation Provided to the Applicant/Employee: _____

2. Medical Documentation

Joint HRMD-OC determination that medical documentation is necessary

HR Rep _____ OC Rep _____

Date Requested: _____

Date Provided: _____

Type of Documentation Provided: _____

If documentation required, is it adequate?

Yes

No

Comments: _____

3. Third Party Assessment

Date of Request: _____

Provider: _____

Contact Person: _____

4. Summary of "interactive process": _____

Section C. Final Action

1. Date Employee/Applicant received accommodation, if approved: _____

2. a. HRMD comments: _____

b. Name and Signature: _____ c. Date: _____

Privacy Act Statement

The Rehabilitation Act of 1973, 29 U.S.C. § 791, and Executive Order 13164 authorize collection of this information. The primary use of this information is to consider, decide, and implement requests for reasonable accommodation. Additional disclosures of the information may be: To medical personnel to meet a bona fide medical emergency; to another Federal agency, a court, or a party in litigation before a court or in an administrative proceeding being conducted by a Federal agency when the Government is a party to the judicial or administrative proceeding; to a congressional office from the record of an individual in response to an inquiry from the congressional office made at the request of the individual; and to an authorized appeal grievance examiner, formal complaints examiner, administrative judge, equal employment opportunity investigator, arbitrator or other duly authorized official engaged in investigation or settlement of a grievance, complaint or appeal filed by an employee.

Appendix B

SELECTED REASONABLE ACCOMMODATION RESOURCES

U.S. Equal Employment Opportunity Commission

1-800-669-3362 (Voice) 1-800-800-3302 (TT)

The EEOC has published many ADA and Rehabilitation Act-related documents that may assist both individuals requesting accommodations as well as those involved in the decision-making process. Most of these documents are available at www.eeoc.gov.

Job Accommodation Network (JAN)

1-800-232-9675 (Voice/TT)

<http://janweb.icdi.wvu.edu/>.

A service of the Office of Disability Employment Policy, JAN can provide information, free-of-charge, about many types of reasonable accommodations and provide referrals to other organizations that may have particular information about accommodations for persons with different disabilities.

ADA Disability and Business Technical Assistance Centers (DBTACs)

1-800-949-4232 (Voice/TT)

The DBTACs consist of 10 federally funded regional centers that provide information, training, and technical assistance on the ADA. Each center works with local business, disability, governmental, rehabilitation, and other professional networks to provide current ADA information and assistance. The DBTACs can provide information on reasonable accommodation and make referrals to local sources of expertise in reasonable accommodations.

Registry of Interpreters for the Deaf

(301) 608-0050 (Voice/TT)

The Registry offers information on locating and using interpreters and transliteration services.

RESNA Technical Assistance Project

(703) 524-6686 (Voice) (703) 524-6639 (TT)

<http://www.resna.org>

The Rehabilitation Engineering and Assistive Technology Society of North America (RESNA) can refer individuals to projects in all 50 states and the six

territories offering technical assistance on technology-related services for individuals with disabilities. Services may include:

- information and referral centers to help determine what devices may assist a person with a disability (including access to large databases containing information on thousands of commercially available assistive technology products);
- centers where individuals can try out devices and equipment;
- assistance in obtaining funding for and repairing devices; and
- equipment exchange and recycling programs.