

JAN

Job Accommodation Network

Practical Solutions • Workplace Success

Accommodation and Compliance Series

Employees with Post Traumatic Stress Disorder

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A service of the U.S. Department of Labor's Office of Disability Employment Policy

Preface

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Updated 10/08/15.

JAN'S ACCOMMODATION AND COMPLIANCE SERIES

Introduction

JAN's Accommodation and Compliance Series is designed to help employers determine effective accommodations and comply with Title I of the Americans with Disabilities Act (ADA). Each publication in the series addresses a specific medical condition and provides information about the condition, ADA information, accommodation ideas, and resources for additional information.

The Accommodation and Compliance Series is a starting point in the accommodation process and may not address every situation. Accommodations should be made on a case by case basis, considering each employee's individual limitations and accommodation needs. Employers are encouraged to contact JAN to discuss specific situations in more detail.

For information on assistive technology and other accommodation ideas, visit JAN's Searchable Online Accommodation Resource (SOAR) at <http://AskJAN.org/soar>.

Information about Post Traumatic Stress Disorder (PTSD)

What is PTSD?

According to the DSM 5, PTSD is a trauma- and stressor-related disorder caused by an individual's exposure to actual or threatened death, serious injury, or sexual violence in one or more of the following ways:

- directly experiences the traumatic event;
- witnesses the traumatic event in person;
- learns that the traumatic event occurred to a close family member or close friend (with the actual or threatened death being either violent or accidental); or
- experiences first-hand repeated or extreme exposure to aversive details of the traumatic event (not through media, pictures, television or movies unless work-related).

The disturbance, regardless of its trigger, causes clinically significant distress or impairment in the individual's social interactions, capacity to work or other important areas of functioning. It is not the physiological result of another medical condition, medication, drugs or alcohol (APA, 2013).

How prevalent is PTSD?

While exposure to a traumatic event is not uncommon, 7 - 8% of the American population will develop PTSD at some point in their lives. About 8 million adults have PTSD during a given year. This is only a small portion of those who have gone through a trauma. Nearly 10 out of every 100 (or 10%) of women develop PTSD sometime in

their lives compared with about 4 of every 100 (or 4%) of men (National Center for PTSD, 2015).

Among military veterans, PTSD is quite common. Due to the daily exposure to potentially traumatic events, recent data suggest that approximately 11-20% of service members who return home from deployment in Afghanistan and Iraq have symptoms of PTSD. Statistics also show that PTSD occurs in about 15% of Vietnam veterans, and 12% of Gulf War veterans (National Center for PTSD, 2015).

What are the symptoms of PTSD?

Possible symptoms associated with PTSD are re-experiencing, avoidance, negative cognition and mood, and arousal. Re-experiencing involves spontaneous memories of the traumatic event, recurrent dreams related to it, flashbacks or other intense or prolonged psychological distress. Avoidance refers to avoiding the distressing memories, thoughts, feelings or external reminders of the event. Negative cognitions and mood represents countless feelings, from a persistent and distorted sense of blame of self or others, to estrangement from others or markedly diminished interest in activities, to an inability to remember key aspects of the event. Arousal is marked by irritable, angry, aggressive, reckless or self-destructive behavior, sleep disturbances, hyper-vigilance or related problems (APA, 2013).

Most people have some stress-related reactions after a traumatic event, but not everyone gets PTSD. PTSD symptoms usually start soon after the traumatic event, but they may not appear until months or years later. Individuals with PTSD experience many of the symptoms listed above for well over a month and cannot function as they were able to prior to the event. Signs and symptoms of PTSD usually begin within several months of the event. However, symptoms may not occur until many months or even years following the trauma. Those who develop PTSD may not experience all of the symptoms and behaviors listed above.

PTSD and the Americans with Disabilities Act

Is PTSD a disability under the ADA?

The ADA does not contain a list of medical conditions that constitute disabilities. Instead, the ADA has a general definition of disability that each person must meet on a case by case basis (EEOC Regulations . . . , 2011). A person has a disability if he/she has a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or is regarded as having an impairment (EEOC Regulations . . . , 2011).

However, according to the Equal Employment Opportunity Commission (EEOC), the individualized assessment of virtually all people with PTSD will result in a determination of disability under the ADA; given its inherent nature, PTSD will almost always be found to substantially limit the major life activity of brain function (EEOC Regulations . . . , 2011).

Are employees with PTSD required to disclose their disability to their employers?

No. Employees need only disclose their disability if/when they need an accommodation to perform the essential functions of the job. Applicants never have to disclose a disability on a job application, or in the job interview, unless they need an accommodation to assist them in the application or interview process (EEOC, 1992).

Can an employer ask an employee with PTSD to submit to a medical examination?

Yes, if the need for the medical examination is job-related and consistent with business necessity. Typically, employers will ask an employee with PTSD to submit to a medical examination (also called a fitness-for-duty exam) after the employee had an incident on the job that would lead the employer to believe that this employee is unable to perform the job, or to determine if the employee can safely return to work, and if any accommodations will be needed on the job (EEOC, 1992).

Special note: Pre-job offer medical examinations or inquiries are illegal under the ADA. People with PTSD (or any disability) do not have to submit to a medical exam or answer any medical questions until after they are conditionally offered a job (EEOC, 1992).

Do employees with PTSD pose a direct threat to themselves or others?

People who have PTSD do not necessarily pose a direct threat to themselves or others. Employees who control their conditions through medication or therapy probably pose no current risk. Even if direct threat exists, employers should reduce or eliminate the threat by providing an accommodation (EEOC, 1992).

How and when does a person with PTSD ask for an accommodation?

An employee with PTSD can ask for an accommodation at any time when he/she needs an accommodation to perform the essential functions of the job. The employee can make a request verbally or in writing and is responsible for providing documentation of a disability (EEOC, 1992).

Can an employer discipline an employee with PTSD who violates conduct or performance standards?

Yes, an employer can discipline an employee with PTSD who violates conduct standards or fails to meet performance standards, even if the behavior being exhibited is caused by the employee's disability. However, an employer is obligated to consider reasonable accommodations to help the employee with PTSD meet the conduct or performance standards (EEOC, 1992).

Where can employers get additional information about PTSD and the ADA?

JAN provides resources on mental health impairments and the ADA at <http://AskJAN.org/media/psyc.htm>. This includes accommodation ideas, information on

the ADA and its amendments, and guidance from the Equal Employment Opportunity Commission. Two EEOC guidances that may be helpful working through the accommodation process are: The ADA and Psychiatric Disabilities at <http://www.eeoc.gov/policy/docs/psych.html> and The ADA: Applying Performance and Conduct Standards to Employees with Disabilities at <http://www.eeoc.gov/facts/performance-conduct.html>.

Accommodating Employees with PTSD

(Note: People with PTSD may develop some of the limitations discussed below, but seldom develop all of them. Also, the degree of limitation will vary among individuals. Be aware that not all people with PTSD will need accommodations to perform their jobs and many others may only need a few accommodations. The following is only a sample of the possibilities available. Numerous other accommodation solutions may exist.)

Questions to Consider:

1. What limitations is the employee with PTSD experiencing?
2. How do these limitations affect the employee and the employee's job performance?
3. What specific job tasks are problematic as a result of these limitations?
4. What accommodations are available to reduce or eliminate these problems? Are all possible resources being used to determine possible accommodations?
5. Has the employee with PTSD been consulted regarding possible accommodations?
6. Once accommodations are in place, would it be useful to meet with the employee with PTSD to evaluate the effectiveness of the accommodations and to determine whether additional accommodations are needed?
7. Do supervisory personnel and employees need training regarding PTSD?

Accommodation Ideas:

Concentration:

- Reduce distractions in the work area:
 - Provide space enclosures, sound absorption panels, or a private office
 - Allow for use of white noise or environmental sound machines
 - Allow the employee to listen to soothing music
 - Provide a noise cancelling headset
 - Plan for uninterrupted work time
 - Purchase organizers to reduce clutter

- Increase natural lighting or provide full spectrum lighting
- Allow flexible work environment:
 - Flexible scheduling
 - Modified break schedule
 - Work from home/Flexi-place
- Divide large assignments into smaller tasks and goals
- Use auditory or written cues as appropriate
- Restructure job to include only essential functions
- Provide memory aids such as schedulers, organizers, and / or apps

Memory:

- Provide written as well as verbal instructions
- Provide written checklists
- Use a wall calendar
- Use a daily or weekly task list
- Provide verbal prompts and reminders
- Use electronic organizers, hand held devices, and /or apps
- Allow the employee to record meetings and trainings
- Provide printed minutes of meetings and trainings
- Allow additional training time for new duties
- Provide a mentor for daily guidance
- Provide reminders of important deadlines via e-mails, memos, and weekly supervision
- Use notebooks, planners, or sticky notes to record information for easy retrieval
- Provide cues to assist in location of items by using labels, color coding, or bulletin boards
- Post written instructions for use of equipment

Organization:

- Use daily, weekly, and monthly task lists
- Use calendar with automated reminders to highlight meetings and deadlines
- Use electronic organizers, mobile devices, and / or apps
- Divide large assignments into smaller tasks and goals
- Use a color coding scheme to prioritize tasks
- Hire a job coach or a professional organizer
- Assign a mentor to assist employee

Time Management / Completing Tasks:

- Make daily TO-DO lists and check items off as they are completed

- Provide organizational tools such as electronic schedulers, recorders, software organizers, calendars, watches, and apps
- Divide large assignments into smaller tasks and steps
- Schedule weekly meetings with supervisor, manager, or mentor to determine if goals are being met
- Remind employee of important deadlines
- Assign a mentor to assist with determining goals, providing daily guidelines, reminding of important deadlines
- Consider providing training on time management

Stress / Emotions:

- Encourage use of stress management techniques to deal with frustration
- Allow the presence of a support animal
- Allow telephone calls during work hours to doctors and others for needed support
- Use a mentor or supervisor to alert the employee when his/her behavior is becoming unprofessional or inappropriate
- Assign a supervisor, manager, or mentor to answer the employee's questions
- Restructure job to include only essential functions during times of stress
- Refer to counseling, employee assistance programs (EAP)
- Provide backup coverage for when the employee needs to take breaks
- Allow flexible work environment:
 - Flexible scheduling
 - Modified break schedule
 - Leave for counseling
 - Work from home/Flexi-place

Panic Attacks:

- Allow the employee to take a break and go to a place where s/he feels comfortable to use relaxation techniques or contact a support person
- Identify and remove environmental triggers such as particular smells or noises
- Allow the presence of a support animal

Sleep Disturbances:

- Allow for a flexible start time
- Combine regularly scheduled short breaks into one longer break
- Provide a place for the employee to sleep during break
- Allow the employee to work one consistent schedule
- Provide a device such as a Doze Alert or other alarms to keep the employee alert
- Increase natural lighting or provide full-spectrum lighting

Fatigue:

- Allow flexible work environment:
 - Flexible scheduling
 - Modified break schedule
 - Work from home/Flexi-place
- Provide a goal-oriented workload
- Reduce or eliminate physical exertion and workplace stress
- Implement ergonomic workstation design

Attendance:

- Allow flexible work environment:
 - Flexible scheduling
 - Modified break schedule
 - Leave for counseling
 - Work from home/Flexi-place
- Provide straight shift or permanent schedule
- Allow the employee to make up the time missed
- Modify attendance policy
 - Example: count one occurrence for all PTSD-related absences

Coworker Interaction:

- Encourage the employee to walk away from frustrating situations and confrontations
- Allow the employee to work from home part-time
- Provide partitions or closed doors to allow for privacy
- Provide disability awareness training to coworkers and supervisors

Working Effectively:

Two common issues that JAN receives inquiries on are: (1) what accommodations will work for individuals with PTSD when workplaces are implementing substantial changes, and (2) what accommodations will help supervisors work effectively with individuals with PTSD. Many accommodation ideas are born from effective management techniques. When organizations are implementing workplace changes, it is important that key personnel recognize that a change in the environment or in supervisors may be difficult. Maintaining open channels of communication to ensure any transitions are smooth, and providing short weekly or monthly meetings with employees to discuss workplace issues can be helpful.

Supervisors can also implement management techniques that support an inclusive workplace culture while simultaneously providing accommodations. Techniques include the following:

- Provide positive praise and reinforcement,
- Provide day-to-day guidance and feedback,
- Provide written job instructions via email,
- Develop clear expectations of responsibilities and the consequences of not meeting performance standards,
- Schedule consistent meetings with employee to set goals and review progress,
- Allow for open communication,
- Establish written long term and short term goals,
- Develop strategies to deal with conflict,
- Develop a procedure to evaluate the effectiveness of the accommodation,
- Educate all employees on their right to accommodations,
- Provide sensitivity training to coworkers and supervisors,
- Do not mandate that employees attend work related social functions, and
- Encourage all employees to move non-work related conversations out of work areas.

Situations and Solutions:

An administrative assistant with PTSD works at a museum, which is currently under construction. Construction workers, who were strangers, caused the employee extreme anxiety. As an accommodation, a JAN consultant suggested temporarily relocating the employee's work space away from the construction area. The museum also developed an ID badge for construction workers and required them to sign in at their job locations.

A prison guard, recently attacked by an inmate, has PTSD and anxiety. The prison guard was fearful of returning to the worksite, even to discuss her return-to-work options. A JAN consultant offered the following suggestions: allow the employee to bring a support person or support animal to the meeting, move the meeting to an alternative location, or allow the employee to attend the meeting via telephone.

An office worker who was stalked and harassed by a former employee now has a panic disorder. She is fearful of answering her office telephone. JAN suggested these accommodations to her employer: use telephone with a caller ID function and/or call blocking function, change the tone or frequency of telephone ringer to reduce panic reaction, route all calls through a switchboard or receptionist, and disable this employee's direct extension to prohibit direct calls.

A vocational school teacher with PTSD requested accommodations due to anxiety and flashbacks. She taught in a building separated from the main school, and she had difficulty dealing with large classrooms of unruly students. As an accommodation, JAN

suggested training the teacher on special behavior management techniques and providing administrative support for student disciplinary actions. The school also provided the teacher a two-way radio, which allowed her to contact an administrator quickly when she needed immediate assistance in her classroom.

A postal employee with PTSD requested accommodations to help him deal with recurring flashbacks. His flashbacks were triggered by the smell of gasoline and the noise from the mail truck. The employee tried wearing a respirator to give him a clean air supply. He also tried wearing headphones to reduce the noise from the truck, but he still experienced stress and edginess. JAN suggested a position transfer as an accommodation. JAN also suggested allowing this employee to take a break when he experiences extreme anxiety and allow him to use relaxation and visualization techniques in a private space on the job.

A veteran who is now an office employee has PTSD and anxiety. He is easily frightened when being approached unsuspectingly. This employee works in a structured cubicle environment facing his computer and cubicle walls, with his back to the cubicle entrance. He wants to be alerted when a coworker or supervisor walks into the cubicle behind him. JAN suggested using a monitor-mounted mirror, so he could see the entrance behind him. JAN also suggested placing a sensor mat at the entrance of the cubicle, which will make an audible alert when someone steps on it.

Resources

Job Accommodation Network

West Virginia University
PO Box 6080
Morgantown, WV 26506-6080
Toll Free: (800)526-7234
TTY: (877)781-9403
Fax: (304)293-5407
jan@AskJAN.org
<http://AskJAN.org>

The Job Accommodation Network (JAN) is a free consulting service that provides information about job accommodations, the Americans with Disabilities Act (ADA), and the employability of people with disabilities.

Office of Disability Employment Policy

200 Constitution Avenue, NW, Room S-1303
Washington, DC 20210
Toll Free: (866)633-7365
TTY: (877)889-5627
Fax: (202)693-7888
<http://www.dol.gov/odep/>

The Office of Disability Employment Policy (ODEP) is an agency within the U.S. Department of Labor. ODEP provides national leadership to increase employment opportunities for adults and youth with disabilities while striving to eliminate barriers to employment.

American Academy of Experts in Traumatic Stress

368 Veterans Memorial Hwy
Commack, NY 11725
Direct: (631)543-2217
Fax: (631)543-6977
info@aaets.org
<http://www.aaets.org>

The American Academy of Experts in Traumatic Stress® is a multidisciplinary network of professionals who are committed to the advancement of intervention for survivors of trauma. The Academy aims to identify expertise among professionals, across disciplines, and to provide meaningful standards for those who work regularly with survivors.

Anxiety Disorders Association of America

8730 Georgia Avenue
Suite 600
Silver Spring, MD 20910
Direct: (240)485-1001
Fax: (240)485-1035
<http://www.adaa.org>

Resources for clinicians, researchers and other treatment providers in all disciplines. Resources for anxiety disorder sufferers, family members, and other interested parties. Fast facts, statistics, news releases and more for media professionals. Search for treatment providers near you.

International Society for Traumatic Stress Studies

111 Deer Lake Road, Suite 100
Deerfield, IL 60015
Direct: (847)480-9028
Fax: (847)480-9282
<http://www.istss.org>

The International Society for Traumatic Stress Studies (ISTSS) is the world's premier trauma organization dedicated to trauma treatment, education, research and prevention. Through this organization, professionals share information about the effects of trauma, seeking to reduce traumatic stressors and their immediate and long-term consequences.

National Center for Post Traumatic Stress Disorder

Direct: (802)296-6300
ncptsd@va.gov
<http://www.ncptsd.va.gov/>

Strives to advance the clinical care and social welfare of America's veterans through research, education, and training in the science, diagnosis, and treatment of PTSD and stress-related disorders.

National Center for Victims of Crime

2000 M Street NW
Suite 480
Washington, DC 20036
Direct: (202)467-8700
Fax: (202)467-8701
<http://www.ncvc.org/>

Purpose is to forge a national commitment to help victims of crime re-build their lives.

PTSD Alliance

<http://www.ptsdalliance.org>

A group of professional and advocacy organizations that have joined forces to provide educational resources to individuals diagnosed with PTSD and their loved ones; those at risk for developing PTSD; and medical, healthcare and other frontline professionals.

Rape, Abuse, and Incest National Network

2000 L St. NW

Ste. 406

Washington, DC 20036

Toll Free: (800)656-4673

info@rainn.org

<http://www.rainn.org>

When a victim calls, a computer identifies the caller's location by reading the area code and the first three digits of the phone number. Then, the call is connected instantaneously to the rape crisis center nearest the caller. If the line is busy, the call will be connected to the next closest member center. The local center answers the call as if it had come in directly, providing counseling and support. Every call is completely confidential.

Sidran Institute

PO Box 436

Brooklandville, MD 21022-0436

Direct: (410)825-8888

Fax: (410)560-0134

help@sidran.org

<http://www.sidran.org>

Dedicated to supporting people with traumatic stress conditions, providing education and training on treating and managing traumatic stress, providing trauma-related advocacy, and informing the public on issues related to traumatic stress.

References

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