Accommodation and Compliance Series: Employees with Diabetes

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Funded by a contract with the Office of Disability Employment Policy, U.S. Department of Labor
Preface

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Updated 01/24/2019.
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 https://askjan.org/soar.

Information about Diabetes

Diabetes is a disease in which blood glucose levels are above normal. Most of the food we eat is turned into glucose, or sugar, for our bodies to use for energy. The pancreas, an organ that lies near the stomach, makes a hormone called insulin to help glucose get into the cells of our bodies. When you have diabetes, your body either doesn't make enough insulin or can't use its own insulin as well as it should. This causes sugar to build up in your blood. Diabetes can cause serious health complications including heart disease, blindness, kidney failure, and lower-extremity amputations.

Type 1 diabetes was previously called insulin-dependent diabetes mellitus (IDDM) or juvenile-onset diabetes. Type 1 diabetes develops when the body's immune system destroys pancreatic beta cells, the only cells in the body that make the hormone insulin that regulates blood glucose. This form of diabetes usually strikes children and young adults, although disease onset can occur at any age. Type 1 diabetes may account for 5% to 10% of all diagnosed cases of diabetes.

Type 2 diabetes was previously called non-insulin-dependent diabetes mellitus (NIDDM) or adult-onset diabetes. Type 2 diabetes may account for about 90% to 95% of all diagnosed cases of diabetes. It usually begins as insulin resistance, a disorder in which the cells do not use insulin properly. As the need for insulin rises, the pancreas gradually loses its ability to produce insulin. Type 2 diabetes is associated with older age, obesity, family history of diabetes, history of gestational diabetes, impaired glucose metabolism, physical inactivity, and race/ethnicity.
Gestational diabetes is a form of glucose intolerance that is diagnosed in some women during pregnancy. During pregnancy, gestational diabetes requires treatment to normalize maternal blood glucose levels to avoid complications in the infant. After pregnancy, 5% to 10% of women with gestational diabetes are found to have type 2 diabetes.

Other specific types of diabetes result from specific genetic conditions (such as maturity-onset diabetes of youth), surgery, drugs, malnutrition, infections, and other illnesses.

Healthy eating, physical activity, and insulin injections are the basic therapies for type 1 diabetes. The amount of insulin taken must be balanced with food intake and daily activities. Blood glucose levels must be closely monitored through frequent blood glucose testing.

**Diabetes and the Americans with Disabilities Act**

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. 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. For more information about how to determine whether a person has a disability under the ADA, see [How to Determine Whether a Person Has a Disability under the Americans with Disabilities Act Amendments Act (ADAAA)](#).

**Accommodating Employees with Diabetes**

People with diabetes 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 arthritis 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 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 been consulted regarding possible accommodations?
6. Once accommodations are in place, would it be useful to meet with the employee to evaluate the effectiveness of the accommodations and to determine whether additional accommodations are needed?

7. Do supervisory personnel and employees need training?

**Accommodation Ideas:**

**Limitations**

Decreased Stamina/Fatigue
- Aide/Assistant/Attendant
- Anti-fatigue Matting
- Elevating Wheelchairs
- Ergonomic Assessments
- Ergonomic Equipment
- Flexible Schedule
- Job Restructuring
- Periodic Rest Breaks
- Scooters
- Stand-lean Stools
- Telework, Work from Home, Working Remotely
- Walkers
- Wearable Anti-fatigue Matting
- Wheelchairs
- Worksite Redesign / Modified Workspace

Dietary Needs
- Flexible Schedule
- Mini Refrigerators/ Electric Coolers
- Policy Modification

Dizziness
- Alternative Lighting
- Fall Protection
- Flexible Schedule
• Modified Break Schedule
• Padded Edging
• Personal Safety and Fall Alert Devices
• Protective Eyewear
• Rollators and Rolling Walkers
• Scooters
• Telework, Work from Home, Working Remotely

Memory Loss
• Additional Training Time / Training Refreshers
• Apps for Memory
• Electronic Organizers
• Memory Software
• Recorded Directives, Messages, Materials
• Reminders
• Support Person
• Verbal Cues
• Wall Calendars and Planners
• Written Instructions

Mental Confusion
• Job Coaches
• Marginal Functions
• On-site Mentoring
• PDAs, Notetakers, and Laptops
• Reminders
• Supervisory Methods
• Training Modifications
• Written Instructions

Progressive Vision Loss
• Accessible Telephones
• Apps for Individuals with Vision Impairment
• Closed Circuit TV (CCTV)
• Computer Braille Display
• External Computer Screen Magnification
• Head-mounted Magnifiers
• Job Restructuring
• Large Button Phones
• Large Visual Display for Telephone
• Lighted Reading Glasses
• Low Vision Enhancement Products
• Low Vision Office Supplies
• Magnification (Hand or Stand)
• Optical Character Recognition (OCR) Systems - Scan
• Portable Video/Electronic Magnifiers
• Screen Magnification and Screen Reading Combined
• Screen Magnification Software
• Service Animal
• Sewing Aids for Individuals with Vision Impairment
• Tactile Graphics & Maps
• Talking Alarm Clocks
• Talking Bar Code Scanner/Reader
• Talking Blood Glucose Monitors
• Talking Blood Pressure Monitors
• Talking Cash Register
• Talking Color Detector
• Talking Copier
• Talking Money Identifier
• Talking Scales
• Talking Telephones
• Talking Watches
• Telework, Work from Home, Working Remotely

Seizure Activity
• Designated Responders
• Disability Awareness/Etiquette Training
• Fall Protection
• Flexible Schedule
• Job Restructuring
• Modified Break Schedule
• Modified Lighting
• Padded Edging
• Plan of Action
• Policy Modification
• Protective Eyewear
• Rolling Safety Ladders
• Rest Area/Private Space
• Telework, Work from Home, Working Remotely
• Workplace Safety

Standing
• Adjustable Workstations for Industrial Settings
• Adjustable Workstations for Office Settings
• Anti-fatigue Matting
• Assist Lift Cushions
• Elevating Lift and Office Chairs
• Flexible Schedule
• Grab Bars
• Periodic Rest Breaks
• Scooters
• Stand Aids
• Stand-lean Stools
• Stand-up Wheelchairs

Take Medication
• Additional Training Time / Training Refreshers
• Flexible Schedule
• Medication Reminders
• Policy Modification
• Reminders
• Rest Area/Private Space
• Telework, Work from Home, Working Remotely
• Verbal Cues
• Voice Recorders

Walking
• Anti-fatigue Matting
• Scooters
• Telework, Work from Home, Working Remotely
• Walkers
• Wearable Anti-fatigue Matting
• Walkers with Seats
• Wheelchairs
• Worksite Redesign / Modified Workspace

**Work-Related Functions**

Policies
• Additional Training Time / Training Refreshers
• Aide/Assistant/Attendant
• Flexible Schedule
• Marginal Functions
• Modified Break Schedule
• Periodic Rest Breaks
• Policy Modification
• Reassignment
• Service Animal
• Supervisory Methods
• Support Animal
• Telework, Work from Home, Working Remotely

Safety Standards
• Aerial Lifts
• Alerting Devices
• Body Protection
• Cut and Puncture Resistant Gloves and Sleeves
• Designated Responders
• Established Routes of Travel for Heavy Equipment/Vehicles
• Fall Protection
• Machine Guards and Shields
• Personal Safety and Fall Alert Devices
• Plan of Action
• Task Rotation
• Steel Toe Shoes & Toe Guards
• Rolling Safety Ladders
• Workplace Safety

Use Cognitive Function
• Additional Training Time / Training Refreshers
• Aide/Assistant/Attendant
• Color Coded System
• Counting/Measuring Aids
• Electronic Dictionaries
• Electronic Organizers
• Extra Time
• Job Coaches
• Line Guides
• Marginal Functions
• Modified Break Schedule
• On-site Mentoring
• Reassignment
- Reminders
- Service Animal
- Support Person
- Training Modifications
- Uninterrupted Work Time
Situations and Solutions:

A cafeteria worker with diabetes had difficulty standing in one place for long periods of time. Accommodations included anti-fatigue mats, sit/stand/lean stool, and flexible rest breaks.

A production assembly line worker had symptoms of frequent urination and diabetic neuropathy in his legs. The employee could not leave his work area except during scheduled breaks. Accommodation included the use of an anti-fatigue mat, sit/stand/lean stool, and an in-house paging system to notify the supervisor that a replacement is needed while the employee takes a restroom break.

A paralegal with diabetes was having trouble keeping his blood sugar under control, which led to very bad breath. He and her employer agreed that he would temporarily be excused from going into court during trials. They agreed to reassess the situation in three weeks, the amount of time his doctor estimated it would take to get his condition under control.

An employer received a request from an employee who disclosed that he had diabetes and needed to modify his break times so he could check his blood sugar levels and administer insulin. Because diabetes virtually always meets the definition of disability (substantially limits the functions of the endocrine system), the employer did not require medical documentation to show the employee has a covered disability, but instead focused on the need for accommodation.

A retail sales associate with diabetes developed complications that affected the functioning of her kidneys. She required hemodialysis three times a week. Hemodialysis requires adhering to a fixed schedule. The employee requested a transfer to a store closer to the dialysis center as an accommodation under the ADA, and applied leave under the FMLA, when needed, to receive dialysis.

An employee in a manufacturing plant had difficulty working through an 8-hour shift without a break due to his diabetes. Typically, employees work straight through. Accommodations were made so that the employee could have a flexible schedule where a break can be provided if employee makes up the time by coming in 15 minutes early and staying 15 minutes later.

A data entry clerk with diabetes was having problems with vision. Her employer installed additional lighting in the file room and purchased a glare filter for her computer monitor to reduce eyestrain.
A nurse with insulin-dependent diabetes and hypoglycemia was having problems regulating her condition (specifically, eating regularly while at work). Her schedule was altered by eliminating the evening rotation until her blood glucose levels could be controlled on a consistent basis.

An investigator was having problems balancing between reading text and his computer screen due to diabetic retinopathy. Accommodations were made so he could use task lighting, a glare filter for computer monitor, and closed circuit television with a split screen to view text and the computer monitor at same time.

A social worker with Type 2 diabetes was experiencing vision loss. The individual requested a reduced workload. The employer contacted JAN looking for alternatives to lowering productivity standards. JAN suggested stand magnification equipment for reading print materials and screen magnification software for reading from the computer screen.

**Products**

There are numerous products that can be used to accommodate people with limitations. JAN's Searchable Online Accommodation Resource at [https://askjan.org/soar](https://askjan.org/soar) is designed to let users explore various accommodation options. Many product vendor lists are accessible through this system; however, JAN provides these lists and many more that are not available on the Web site upon request. Contact JAN directly if you have specific accommodation situations, are looking for products, need vendor information, or are seeking a referral.
Resources

Job Accommodation Network
West Virginia University
PO Box 6080
Morgantown, WV 26506-6080
Toll Free: (800) 526-7234
TTY: (304) 293-7186
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
odep@dol.gov
http://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 Association of Diabetes Educators
200 W. Madison Street
Suite 800
Chicago, IL 60606
Toll Free: (800) 338-3633
info@diabeteseducator.org
http://www.diabeteseducator.org
The AADE is a multi-disciplinary professional membership organization dedicated to advancing the practice of diabetes self-management training and care as integral components of health care for persons with diabetes and lifestyle management for the prevention of diabetes.

**American Diabetes Association**
1701 North Beauregard Street
Alexandria, VA 22311
Toll Free: (800) 342-2383
AskADA@diabetes.org
http://www.diabetes.org/

The American Diabetes Association is the nation’s leading nonprofit health organization providing diabetes research, information and advocacy.

**American Dietetic Association**
120 South Riverside Plaza,
Suite 2000
Chicago, IL 60606
Toll Free: (800) 877-1600
Direct: (312) 899-0040
knowledge@eatright.org
http://www.eatright.org

ADA members are the most valued source of food and nutrition services.

**American Heart Association**
7272 Greenville Avenue
Dallas, TX 75231
Toll Free: (800) 242-8721
Review.personal.info@heart.org
http://www.heart.org/HEARTORG/

The American Heart Association is dedicated to providing education and information on fighting heart disease and stroke. Our mission is to build healthier lives, free of cardiovascular diseases and stroke. That single purpose drives all we do.
American Orthopaedic Foot & Ankle Society
9400 West Higgins Road
Suite 220
Rosemont, IL 60018-4975
Toll Free: (800) 235-4855
aofasinfo@aofas.org
https://www.aofas.org

American Orthopaedic Foot & Ankle Society’s FootCareMD is your source for reliable information on foot and ankle conditions and treatments. All content was developed and peer reviewed by orthopaedic surgeons specializing in foot and ankle surgery. FootCareMD is overseen by the AOFAS Public Education Committee and maintained by AOFAS staff.

American Physical Therapy Association

MoveForwardPT.com is the official consumer information website of the American Physical Therapy Association.

Association of Late Deafened Adults
8038 MacIntosh Lane
Rockford, IL 61107
Direct: (815) 332-1515
info@alda.org
http://www.alda.org/

A resource center providing information and referrals, self-help, and support groups for people deafened as adults.

Their mission is to support the empowerment of deafened people.
The Centers for Disease Control and Prevention are dedicated to protecting the health and safety of people - at home and abroad, providing credible information to enhance health decisions, and promoting health through strong partnerships.

Diabulimia Helpline
Direct: (425) 985-3635
info@diabulimiahelpline.org
http://www.diabulimiahelpline.org/

A non-profit organization dedicated to education, support, and advocacy for diabetics with eating disorders, and their loved ones.

Eunice Kennedy Shriver National Institute of Child Health and Human Development
31 Center Drive
Building 31, Room 2A32
Bethesda, MD 20892-2425
Toll Free: (800) 370-2943
Fax: (866) 760-5947
NICHDInformationResourceCenter@mail.nih.gov
http://www.nichd.nih.gov/Pages/index.aspx

The mission of the NICHD is to ensure that every person is born healthy and wanted, that women suffer no harmful effects from reproductive processes, and that all children have the chance to achieve their full potential for healthy and productive lives, free from disease or disability, and to ensure the health, productivity, independence, and well-being of all people through optimal rehabilitation.
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The Genetic and Rare Diseases (GARD) Information Center is a program of the National Center for Advancing Translational Sciences (NCATS) and funded by two parts of the National Institutes of Health (NIH): NCATS and the National Human Genome Research Institute (NHGRI). GARD provides the public with access to current, reliable, and easy to understand information about rare or genetic diseases in English or Spanish.
JDRF funds research that transforms the lives of people with type 1 diabetes (T1D). We want a cure, and we won’t stop until we find one. Along the way, we will continue to drive scientific progress that delivers new treatments and therapies that make day-to-day life with T1D easier, safer and healthier.

**Mayo Clinic**
13400 E. Shea Blvd.
Scottsdale, AZ 85259
Direct: (480) 301-8000
http://www.mayoclinic.org/

The Mayo Clinic's mission to inspire hope and contribute to health and well-being by providing the best care to every patient through integrated clinical practice, education and research.

**MedlinePlus**
8600 Rockville Pike
Bethesda, MD 20894
custserv@nlm.nih.gov
https://www.nlm.nih.gov/medlineplus/

MedlinePlus is the National Institutes of Health's Web site for patients and their families and friends. Produced by the National Library of Medicine, the world's largest medical library, it brings you information about diseases, conditions, and wellness issues in language you can understand. MedlinePlus offers reliable, up-to-date health information, anytime, anywhere, for free.

Created by the U.S. National Library of Medicine

**National Center for Biotechnology Information**
8600 Rockville Pike
Bethesda, MD 20894
pubmedcentral@ncbi.nlm.nih.gov
MISSION: IMS brings together an international community of health care professionals, researchers, educators, and others to improve care and transform delivery of treatment to those suffering from soft tissue pain through the promotion and exchange of globally recognized research, education, and innovation in patient care.

**National Eye Institute**

31 Center Drive MSC 2510  
Bethesda, MD 20892-2510  
Direct: (301) 496-5248  
2020@nei.nih.gov  
https://nei.nih.gov/

The National Eye Institute’s Office of Science Communications, Public Liaison and Education responds directly to requests for information on eye diseases and vision research in English and Spanish.

**National Heart, Lung, and Blood Institute**

P.O. Box 30105  
Attention: Website  
Bethesda, MD 20824-0105  
Direct: (301) 592-8573  
Fax: (240) 629-3246  
nhlbiinfo@nhlbi.nih.gov  
http://www.nhlbi.nih.gov/

The National Heart, Lung, and Blood Institute (NHLBI) provides leadership for a national program in diseases of the heart, blood vessels, lung, and blood.

**National Institute of Diabetes and Digestive and Kidney Diseases**

Building 31, Room 9A06  
31 Center Drive, MSC 2560  
Bethesda, MD 20892-2560  
Direct: (301) 496-3583  
http://www.niddk.nih.gov/Pages/default.aspx
The National Institute of Diabetes and Digestive and Kidney Diseases conducts and supports research on many of the most serious diseases affecting public health. The Institute supports much of the clinical research on the diseases of internal medicine and related subspecialty fields as well as many basic science disciplines.

National Institute on Aging
31 Center Drive
MSC 2292
Bethesda, MD 20892
Toll Free: (800) 222-2225
niaic@nia.nih.gov
https://www.nia.nih.gov/

At NIA, our mission is to discover what may contribute to a healthy old age as well as to understand and address the disease and disability sometimes associated with growing older. In pursuit of these goals, our research program covers a broad range of areas, from the study of basic cellular changes that occur with age to the examination of the biomedical, social, and behavioral aspects of age-related conditions, including Alzheimer’s disease.

National Jewish Health
1400 Jackson Street
Denver, CO 80206
Toll Free: (877) 225-5654
Direct: (303) 388-4461
http://www.nationaljewish.org/

National Jewish Health is known worldwide for treatment of patients with respiratory, cardiac, immune and related disorders, and for groundbreaking medical research. Founded in 1899 as a nonprofit hospital, National Jewish Health remains the only facility in the world dedicated exclusively to these disorders. U.S. News & World Report has ranked National Jewish Health as the number one or number two hospital in pulmonology on its Best Hospitals list ever since pulmonology was included in the rankings.
The National Kidney Foundation, Inc., a major voluntary health organization, seeks to prevent kidney and urinary tract diseases, improve the health and well-being of individuals and families affected by these diseases, and increase the availability of all organs for transplantation.

NORD is a unique federation of voluntary health organizations dedicated to helping people with rare "orphan" diseases and assisting the organizations that serve them. NORD is committed to the identification, treatment, and cure of rare disorders through programs of education, advocacy, research, and service.

Office on Women’s Health
Department of Health and Human Services
200 Independence Avenue, SW Room 712E
Washington, DC 20201
Toll Free: (800) 994-9662
Direct: (202) 690-7650
Fax: (202) 205-2631
http://www.womenshealth.gov/
The Office on Women’s Health (OWH), part of the U.S. Department of Health and Human Services (HHS), works to improve the health and sense of well-being of all U.S. women and girls. OWH serves as the focal point for women’s health activities across HHS offices and agencies and leads HHS efforts to ensure that all women and girls achieve the best possible health.

Remedy’s Health Communities
http://www.healthcommunities.com

Remedy Health Media is America’s fastest growing health information and technology company. We are a leading provider of clinical resources and wellness tools that help millions of patients and caregivers live healthier, more fulfilled lives.

Our mission is to empower patients and caregivers with the information and applications needed to efficiently navigate the healthcare landscape and as a result, to permit better health outcomes through use of our products and services.

The Foundation for Peripheral Neuropathy
485 Half Day Road
Suite 350
Buffalo Grove, IL 60089
Toll Free: (877) 883-9942
Fax: (847) 883-9960
info@tffpn.org
https://www.foundationforpn.org/

The Foundation for Peripheral Neuropathy is a Public Charity committed to fostering collaboration among today’s most gifted and dedicated neuroscientists and physicians. These specialists from around the country will help us maintain a comprehensive view of the field and determine the research areas that hold the most promise in neuropathy research and treatment to develop new and effective therapies that can reverse, reduce and one day eliminate Peripheral Neuropathy. It is our ultimate goal to utilize every means and opportunity to dramatically improve the lives of those living with this painful and debilitating disorder.
The Agency is responsible for providing employment, training, educational and reemployment rights information and assistance to veterans, and other military personnel who are preparing to transition from the military. Also provide hearing aids. All World War I veterans are eligible to receive free hearing aids. Other veterans can receive free hearing aids if their hearing loss is at least 50% service-related.

Vascular Cures
555 Price Avenue
Suite 180
Redwood City, CA 94063
Direct: (650) 368-6022
info@vascularcures.org
http://vascularcures.org

Vascular Cures is the only 501(c)3 nonprofit organization representing the millions of patients with Vascular Disease in the U.S. We focus on creating long-term, shared resources to accelerate development of new treatments and improve patient health.

World Health Organization
525 Twenty-third Street
N.W.
Washington, DC 20037
Direct: (202) 974-3000
Fax: (202) 974-3663
http://www.who.int/en/

We are the directing and coordinating authority on international health within the United Nations’ system.
This document was developed by the Job Accommodation Network, funded by a contract from the U.S. Department of Labor, Office of Disability Employment Policy (#1605DC-17-C-0038). The opinions expressed herein do not necessarily reflect the position or policy of the U.S. Department of Labor. Nor does mention of tradenames, commercial products, or organizations imply endorsement by the U.S. Department of Labor.