

FAMILY INVESTMENT ADMINISTRATION

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Originating Office:	Office of Programs
Required Actions:	LDSS and Family Investment staff must familiarize themselves with the updated system processes and procedures for handling reasonable accommodation requests as outlined in this Action Transmittal and its attachments. All staff are required to utilize the new E&E system functionalities for tracking and managing reasonable accommodations to ensure compliance with the federal Office of Civil Rights audit finding.
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Related State Laws	Maryland Human Services Code Annotated §5-316(a)(1)(i)(2)
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 Maryland Department of Human Services Department of Human Services 25 S Charles Street Baltimore MD 21201	FAMILY INVESTMENT ADMINISTRATION (FIA) ACTION TRANSMITTAL
Control Number: # 27-02	Effective Date: July 01, 2026 Issuance Date: July 21, 2026

**TO: DIRECTORS, LOCAL DEPARTMENTS OF SOCIAL SERVICES
DEPUTY/ASSISTANT DIRECTORS FOR FAMILY INVESTMENT,
FAMILY INVESTMENT SUPERVISORS, AND ELIGIBILITY STAFF**

FROM: AUGUSTIN NTABAGANYIMANA, EXECUTIVE DIRECTOR 

RE: UPDATED REASONABLE ACCOMMODATIONS PROCEDURES

**PROGRAMS AFFECTED: TEMPORARY CASH ASSISTANCE,
SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM, MEDICAL
ASSISTANCE**

ORIGINATING OFFICE: OFFICE OF PROGRAMS

CONTENTS

SECTION 1: SUMMARY.....3

SECTION 2: BACKGROUND & CONTEXT.....4

SECTION 3: KEY DEFINITIONS & CONCEPTS.....4

 What Are Disabilities/Limitations Under the VRA?.....4

 What Are Reasonable Accommodations Under the VRA?.....5

 How Do Disabilities/Limitations and Reasonable Accommodations Align?.7

 Service Animals vs. Emotional Support Animals.....9

SECTION 4: WHAT HAS CHANGED - SYSTEM UPDATES.....9

 Paper Application Alignment.....10

SECTION 5: ACTIONS REQUIRED.....11

SECTION 6: STAFF GUIDANCE - CUSTOMER INTERACTIONS.....11

SECTION 7: STAFF GUIDANCE - DECISION-MAKING FRAMEWORK.....11

 Factors to Inform Approval.....12

Interactive Process & When to Deny.....	13
A. Reasons to Deny an Accommodation.....	13
B. When Denying a Request for an Accommodation.....	14
Scenario-Based Technical Assistance.....	14
A. Clarification on Eligibility Documentation Deadlines.....	15
B. Clarification on Medical Documentation and Verification.....	16
C. Clarification on Interview and Assessment Requests.....	17
SECTION 8: PRACTICAL IMPLEMENTATION EXAMPLES.....	18
SECTION 9: FREQUENTLY ASKED QUESTIONS.....	19
FAQs for Local Departments and Staff.....	19
The 566 Letter: Responding to Common Customer Inquiries.....	20
SECTION 10: RESOURCES & SUPPORT.....	21

SECTION 1: SUMMARY

Purpose Statement: The purpose of this Action Transmittal (AT) is to provide updated procedures for handling reasonable accommodation requests in the Family Investment Administration (FIA). This guidance implements requirements from the [Voluntary Resolution Agreement](#) (VRA) between the U.S. Department of Health and Human Services (HHS) Office for Civil Rights (OCR) and the Maryland Department of Human Services (DHS), signed in August 2024.

VRA Overview: The VRA resolved disability-based discrimination complaints regarding Maryland's Temporary Cash Assistance (TCA) program. The agreement requires DHS to: (1) ensure individuals with disabilities are not discriminated against in accessing programs, (2) provide reasonable accommodations to customers with disabilities, (3) implement systematic tracking and assessment procedures, (4) modify automated systems to identify and track accommodation needs, and (5) provide ongoing staff training on disability rights and accommodation procedures.

Effective Date & Scope: This AT is effective July 1, 2026 and provides practical, step-by-step guidance for handling reasonable accommodation requests. It **does not replace** existing foundational guidance on civil rights compliance:

1. [FIA AT #15-14](#) provides foundational definitions of disability and civil rights laws.
2. [FIA AT #17-12](#) and [FIA AT #23-13](#) cover broader civil rights requirements including non-discrimination statements and Customer Access Coordinator roles.

This AT focuses on the "how-to" of reasonable accommodations and requires that Local Departments of Social Services (LDSS) ensure non-discrimination

based on disability, provide reasonable accommodations, and track accommodation requests systematically. ADA training will be required for new hires and provided annually for existing staff.

SECTION 2: BACKGROUND & CONTEXT

VRA Background

In August 2024, DHS entered into a VRA with HHS/OCR to resolve complaints alleging disability-based discrimination in Maryland's TCA program. The VRA represents DHS's commitment to ensuring equal access to all programs for individuals with disabilities. The VRA covers all DHS programs receiving federal financial assistance from HHS, and it includes FIA and all 24 LDSS. The agreement remains in effect for three years with ongoing compliance monitoring by OCR.

Why This Matters

Compliance with the VRA ensures that:

1. Customers with disabilities receive equal opportunity to participate in and benefit from DHS programs.
2. Staff have clear procedures and tools to identify accommodation needs and provide appropriate support.
3. DHS meets its legal obligations under Section 504 of the Rehabilitation Act and Title II of the Americans with Disabilities Act (ADA).
4. Systems and processes properly track and document accommodations to prevent future civil rights violations.

SECTION 3: KEY DEFINITIONS & CONCEPTS

What Are Disabilities/Limitations Under the VRA?

"Disability" or "individuals with disabilities" means people who have conditions that **substantially limit** their ability to do one or more major life activities. This definition follows the same standards used in federal laws, specifically Section 504 of the Rehabilitation Act of 1973 and Title II of the ADA.

Major life activities include but are not limited to: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

The table below provides more information on common disabilities or limitations.

Disability or Limitation	Description
Attention-Deficit/Hyperactivity Disorder (ADHD)	A condition impacting attention, focus, or impulse control that may affect a customer's ability to participate in activities or follow procedures.
Cognitive Disability	A limitation in intellectual functioning that may affect a customer's ability to understand program rules, complete forms, or participate in work readiness/training.
Hearing Impairment	A disability affecting a customer's hearing, which requires communication support to ensure they can fully access services and information.
Learning Disability	A disability affecting the ability to acquire, process, or use verbal or non-verbal information, impacting educational or work-related activities.
Mental Health Conditions	A behavioral health disorder or condition that affects a customer's mental functioning, potentially impacting their participation in activities or their interactions with staff.
Mobility Impairment	A disability affecting a customer's ability to move or ambulate, which may require accommodations for physical access or modified interview formats.
Physical Disability	A long-term physical impairment that substantially limits one or more major life activities, potentially requiring physical accommodations or procedural modifications.
Speech Impairment	A disability affecting a customer's ability to communicate verbally, which may require alternative communication methods or devices.
Visual Impairment	A disability affecting a customer's sight, which requires materials to be provided in accessible formats (e.g., large print, audio, or screen reader-friendly files).

What Are Reasonable Accommodations Under the VRA?

A reasonable accommodation is any modification or adjustment that allows a person with a disability an equal opportunity to participate in or access DHS

programs and benefits. Staff must provide accommodations unless doing so would cause undue hardship (meaning significant difficulty or expense) or would fundamentally alter the nature of the service, program, or activity. An accommodation is generally considered reasonable if it is feasible and effectively meets the individual's needs ([28 CFR § 35.130\(b\)\(7\)\(i\)](#)).

The table below provides examples of reasonable accommodations and modifications. The examples are not exhaustive; other reasonable accommodations, such as assistive technology, may be considered based on an individual's needs.

Reasonable Accommodation	Description
Oral/Verbal Notification	Generating an alert to the worker to call the customer and verbally explain the contents of a written notice, in addition to mailing the written copy.
Modified Interview Formats	Adjusting the standard interview process, such as waiving in-person office interviews and using phone or home visits. This may include providing questions in advance or allowing additional response time.
Extended Deadlines	Providing 10 days' additional time for a TCA customer to submit eligibility documents or complete required forms. Deadline extension does not apply to other programs.
Assistance with Medical Documentation	Offering staff assistance to the customer in obtaining or understanding medical documentation required for their case, which may include coordinating with providers.
Alternative Format Materials	Providing documents and materials in formats accessible to the customer, such as large print, audio recordings, or electronic files compatible with screen readers.
Communication Services for Deaf/Hearing Impaired	Ensuring effective communication by providing services such as sign language interpreters, real-time captioning (CART), or assistive listening devices.

Reasonable Accommodation	Description
Assessment and Evaluation Services	Offering a free, specialized assessment to the customer to officially determine their disability-related needs and identify appropriate accommodations or services.
Modifications to Independence Plans (IP)	Adjusting the customer's Independence Plan to incorporate recommended accommodations and align goals/services with their abilities and needs.
Coordinated Services with Outside Agencies	Collaborating with external partners (e.g., Division of Rehabilitative Services [DORS], Maryland Department of Labor, Maryland Department of Disability's Assistive Technology Program [MDTAP]) at the state and local workforce level to provide comprehensive support and avoid conflicting or gaps in services.
Accommodations in Work Activities	Making or negotiating changes to work-related activities, assignments, or work placement sites (shared with vendors) to ensure the customer can participate successfully.

PLEASE NOTE: Submitting or receiving approval for a reasonable accommodation request does not exempt the customer, nor any work-eligible members of their household, from mandated work requirements unless the accommodation specifically addresses those requirements.

How Do Disabilities/Limitations and Reasonable Accommodations Align?

The following table provides general examples of how specific disabilities or limitations may align with reasonable accommodations. Actual accommodation needs vary by individual and must be determined through individualized assessment and the interactive process. These examples are not exhaustive; other accommodations may be appropriate based on specific circumstances.

Disability or Limitation	Reasonable Accommodation Examples
ADHD	Modified Interview Formats; Extended Deadlines; Assessment and Evaluation Services;

Disability or Limitation	Reasonable Accommodation Examples
	Modifications to Independence Plans (IP); Accommodations in Work Activities.
Cognitive Disability	Oral/Verbal Notification; Modified Interview Formats; Extended Deadlines; Assistance with Medical Documentation; Alternative Format Materials; Assessment and Evaluation Services; Modifications to Independence Plans (IP); Coordinated Services with Outside Agencies; Accommodations in Work Activities.
Hearing Impairment	Communication Services for Deaf/Hearing Impaired; Modified Interview Formats; Assessment and Evaluation Services; Coordinated Services with Outside Agencies.
Learning Disability	Oral/Verbal Notification; Modified Interview Formats; Extended Deadlines; Alternative Format Materials; Assessment and Evaluation Services; Modifications to Independence Plans (IP); Accommodations in Work Activities.
Mental Health Conditions	Modified Interview Formats; Extended Deadlines; Assistance with Medical Documentation; Assessment and Evaluation Services; Modifications to Independence Plans (IP); Coordinated Services with Outside Agencies; Accommodations in Work Activities.
Mobility Impairment	Modified Interview Formats (e.g., phone interview); Assistance with Medical Documentation; Assessment and Evaluation Services; Accommodations in Work Activities.
Physical Disability	Modified Interview Formats (e.g., phone interview); Assistance with Medical Documentation; Assessment and Evaluation Services; Accommodations in Work Activities.
Speech Impairment	Communication Services for Deaf/Hearing Impaired (if TTY/text is needed); Modified Interview Formats; Alternative Format Materials; Assessment and Evaluation Services.
Visual Impairment	Oral/Verbal Notification; Alternative Format Materials; Modified Interview Formats; Extended

Disability or Limitation	Reasonable Accommodation Examples
	Deadlines; Assistance with Medical Documentation.

Service Animals vs. Emotional Support Animals

Service animals are individually trained to perform [specific disability-related tasks](#), granting them public access rights under laws like the ADA. State and local governments, businesses, and nonprofit organizations that serve the public generally must allow service animals to accompany people with disabilities in all areas of the facility where the public is allowed to go. At this time, only dogs and miniature horses are recognized as service animals under the ADA.

Emotional support animals provide comfort through their presence but lack task-specific training, meaning they do not have the same public access rights as service animals.

When it is not obvious what service an animal provides, only limited inquiries are allowed. Staff may legally ask only two questions: (1) Is the dog a service animal required because of a disability? and (2) What work or task has the dog been trained to perform? **Individuals with service animals will be able to answer these questions.** Staff cannot ask about the person's disability, require documentation, or ask for a demonstration of the animal's tasks.

SECTION 4: WHAT HAS CHANGED - SYSTEM UPDATES

Eligibility and Enrollment (E&E) System Updates

The E&E system was updated to implement changes to systematically track requests and outcomes for reasonable accommodation requests. System changes were completed on June 30, 2024 and include:

Consumer Portal Updates:

1. A new "Reasonable Accommodation" screen was added to collect information for the head of household and other family members.
2. Customers can request accommodations directly through the portal.

Worker Portal Updates:

1. New "Reasonable Accommodation" screen in the left-hand panel under the Eligibility Determination section. This screen allows workers to record and track reasonable accommodation requests for each family member.
2. Case Home screen displays new "Accommodation Status" in the "Additional Information" box beneath redetermination dates.

Paper Application Alignment

The Form 9701 paper application also includes a section for customers to request reasonable accommodations. Workers who receive paper applications must check this section and enter any requests into the Worker Portal's Reasonable Accommodation screen. This will ensure that all accommodation requests—whether submitted via the Consumer Portal or paper application—are properly tracked in the E&E system.

New Customer Notices

Reasonable Accommodation Notice: Informs customers of the outcome of their reasonable accommodation request once a decision has been made.

Case Closure 566 Notice: Informs customers whose TCA cases closed with code 566 that they are entitled to reasonable accommodations to ensure equal access to DHS programs and services. If the customer was previously denied benefits for not cooperating with program requirements, they may request an assessment for disability and accommodation needs.

New Worker Alerts

Customer Oral/Verbal Notification Alert: Prompts the worker to contact the customer when a new notice will be generated in order to read the notice aloud to the customer. This alert does not appear for every customer, it is only for those who have requested oral notification as an accommodation.

Reasonable Accommodation Requested Alert: Prompts the worker to review the new reasonable accommodation request and supporting documentation. When the worker makes a decision about the request, they must generate a notice to be issued to the customer.

New Reports

Reasonable Accommodation Evaluation Outcome Report: Tracks reasonable accommodation requests and their outcomes. Includes detailed fields like case ID, accommodation type, statuses (approved, denied, pending), and decision dates.

Updated Existing Reports:

1. Application Status Report: New "Household Accommodation Status" field added.
2. Redetermination (Redet) Compliance Report: New "Accommodation Status" field added.
3. Notices Dashboard-Detail Report: New Reasonable Accommodation notices added.

SECTION 5: ACTIONS REQUIRED

LDSS and Family Investment staff must:

1. **Familiarize themselves** with the updated system processes and procedures for handling reasonable accommodation requests, as outlined in this AT.
2. **Utilize the new E&E system functionalities** for tracking and managing reasonable accommodations to ensure compliance with the VRA.
3. **Follow the process outlined in the attached How-to-Guide** to process Reasonable Accommodations Requests.
4. If you still have questions after reviewing this guidance and the How-to Guide, you can:
 1. Contact your local Customer Access Coordinator (CAC). (See attached directory)
 2. Contact the Central Office of Employment and Program Equity Civil Rights Officer.
 3. Submit a JIRA Ticket for systems-related concerns.

SECTION 6: STAFF GUIDANCE - CUSTOMER INTERACTIONS

When a customer calls or enters an LDSS with questions or requests, staff must listen and assist them. Here is a guide for how to handle these interactions:

1. **Acknowledge and Listen:** The customer may present a letter from the VRA or simply ask for help. Acknowledge their request and listen carefully to their needs.
2. **Use the New Reasonable Accommodations Screen:** The E&E system has a new function to process and track reasonable accommodation requests. All staff are required to use this new function.
3. **Provide Answers and Resources:**
 - a. If you know the answer, respond to the customer's question clearly and concisely.
 - b. If you do not know the answer, take them to the right person (often your Customer Access Coordinator) who can help them.
4. **Complete a Referral (if needed):** If the customer needs help beyond what you can provide, follow your local standard operating procedures for completing a referral.

SECTION 7: STAFF GUIDANCE - DECISION-MAKING FRAMEWORK

When a staff member receives a reasonable accommodation request for review, they must determine whether to approve or deny the request. This section provides the complete framework for making that determination.

Factors to Inform Approval

1. **Self-identification:** The most direct way to know that a customer has a disability is when a customer voluntarily discloses their disability. When a customer self-identifies, staff will conduct a brief, respectful interview to understand how the customer's condition affects one or more major life activities and what specific accommodations may be needed. Please note that having a medical condition does not automatically mean an individual has a disability as defined by the ADA. The condition must substantially limit one or more major life activities to qualify.
2. **Use of Assistive Devices and Service Animals:** Mobility aids (e.g., wheelchair, cane) and service animals are clear indicators that a customer may have a disability and may require assistance.
3. **Disability is Known or Obvious:** A customer may have a disability that is documented in the case file or have a condition that is easily seen or noticed by others (e.g., being blind, deaf, and/or paraplegic).
4. **Behavioral and Communication Cues:** When the disability is identified during an interaction with a customer. For example, if a customer is having difficulty following instructions or understanding the process, this may indicate a need for accommodation.
5. **Medical Evidence:** A customer may have written verification of a disability from a medical professional (e.g., medical doctor, licensed clinician).
6. **Government Agency Letters:** Official letters from agencies that issue disability benefits e.g., Social Security Administration.

When you're not sure, it's important to offer assistance instead of making assumptions. You can ask, "Can I help you with anything?" or "How can I assist you?"

Interactive Process

LDSS staff must engage in an "interactive process" to explore potential accommodations and identify one that effectively removes the barrier caused by the individual's disability, without causing undue hardship to the LDSS or fundamentally altering the program. The interactive process is a required, collaborative, two-way discussion between the person requesting an accommodation and the LDSS responsible for providing it. Failure to engage in the interactive process, by itself, can be a violation of the ADA or similar laws.

Interactive Process & When to Deny

If a reasonable accommodation is denied, the LDSS must engage in an "interactive process" to explore alternative accommodations that would be feasible and effectively remove the barrier caused by the customer's disability.

A. Reasons to Deny an Accommodation

1. **Undue Financial and Administrative Burden/Hardship:** The accommodation would require "significant difficulty or expense" to the Department, considering the total financial resources, size, and nature of the operation. This is a high standard for a government agency to meet. For example, requiring an LDSS to build an elevator for a customer with a physical disability/mobility impairment would constitute an undue hardship if a less expensive or alternative solution exists, such as holding the meeting on the first floor or at an accessible location.
 - a. **Note:** Maryland DHS has a statewide contract with Ad Astra for video remote interpretation (VRI) services, which provides on-demand access to sign language and foreign language interpreters. Language Line provides telephonic foreign language interpretation. Because these resources are available, requests for interpretation services may not be denied based on undue financial or administrative burden. Local offices will use Language Line for telephonic interpretation and Ad Astra for video interpretation and written document translation.
2. **Fundamental Alteration of the Program:** The accommodation would fundamentally change the essential nature of the program or its services. For example, a request to waive the required asset limits for TCA eligibility would fundamentally alter the program's design.
3. **Not Disability-Related/Personal Preference:** The customer fails to establish a clear connection between their functional limitations caused by their disability and the need for the requested change.
4. **Lack of Sufficient Documentation Verification:** Documentation is not always required. Staff may ask a customer to provide documentation only when a disability or the need for accommodation is not obvious or already known. Acceptable documentation comes from a medical professional or other appropriate source, confirms the disability, and identifies necessary accommodation(s).
5. **Direct Threat to Health or Safety:** The specific accommodation requested would pose a direct and legitimate threat to the health or safety of other individuals.

6. **Outside Agency's Authority:** The LDSS does not have the power to provide the requested accommodation because it requires an action that violates existing law.
7. **Not Within Scope of Reasonable Accommodation:** The request involves the performance of tasks that falls outside the scope or are unrelated to the program.
8. **Unable to Perform the Essential Functions:** The request does not enable the customer to perform the essential functions required by the program.

B. When Denying a Request for an Accommodation

1. **Engage in the Interactive Process:** The LDSS is required to engage in a conversation with the customer to discuss the denial and explore alternative accommodations.
2. **Suggest Alternatives:** The LDSS must consider available alternative accommodations that are reasonable, effective, feasible, and would not constitute an undue hardship.
3. **Provide a Written Explanation:** Provide a clear, written explanation, in plain language, of why the request was denied, ensuring it connects directly to the specific legal reasons for denial, and provide information about the customer's right to appeal.
4. **Document/Narrate Your Actions:** It is mandatory for staff to document in E&E the steps taken throughout the process to demonstrate a good-faith effort to comply with the law.

Scenario-Based Technical Assistance

The following technical assistance addresses common procedural challenges and ambiguities regarding reasonable accommodation requests.

A. Clarification on Eligibility Documentation Deadlines

Topic	Scenario	Staff Action and Policy
Request for Extended Deadlines for the Supplemental Nutrition Assistance Program (SNAP), Medical Assistance (MA), or the Temporary Disability Assistance Program (TDAP)	A customer requests an Extended Deadline for SNAP, MA, or TDAP documentation. Staff are unsure if this extension overrides the mandatory federal/state Standard of Promptness (SOP) for application processing (e.g., 30 days for SNAP/TCA).	The accommodation applies to Customer Documents, NOT Departmental Deadlines. An extended deadline accommodation provides more time for customer-provided documentation. It cannot override the mandatory federal or state SOP deadlines for application processing. Staff may grant a reasonable extension for verifications (more than the standard 10 days). However, if the SOP deadline is imminent, the case <i>must</i> be processed with available information. This may lead to denial/closure. Granting an extension that would fundamentally violate the program SOP is a valid reason for denial.
TCA Deadline Extension and 30-Day SOP	A TCA customer requests the 10-day Extended Deadline. Staff are unsure how to proceed if this causes the case to be completed after the 30-day SOP.	For customers requesting an accommodation only for TCA , staff must grant the 10-day extension for verifications. The customer must be given the opportunity to provide the verification and, if eligible, have their benefits established retroactive to the date the verification was provided.

B. Clarification on Medical Documentation and Verification

Topic	Scenario	Staff Action and Policy
Scope of Assistance with Medical Documentation	Staff are unsure if "Assistance with Medical Documentation" requires them to help the customer pursue complex benefits applications (like Supplemental Security Income (SSI) or Social Security Disability Insurance (SSDI)) or manage their medical providers.	This accommodation is strictly for aiding the customer in obtaining or understanding medical documentation required for DHS-administered programs or the accommodation request. Staff will offer to fax, email, or mail DHS-required forms (e.g., 500 C) directly to the customer's medical provider on their behalf. Staff may not assist customers with SSI or SSDI applications. Staff must clearly explain the limited scope to the customer.
Necessity of Documentation for Self-Declared Disability	A customer self-identifies a disability (e.g., learning disability, ADHD) but no historical record supports it. Staff are unsure if they must delay the request until formal documentation is received.	Documentation is not required to <i>begin</i> the interactive process or to approve simple procedural accommodations (e.g., Oral Notification, Modified Interview). You may only request written verification if the disability is not known or obvious or the functional limitation is not clearly connected to the requested accommodation. The LDSS must assist the customer in obtaining any necessary documentation.

C. Clarification on Interview and Assessment Requests

Topic	Scenario	Staff Action and Policy
Modified Interview Format	Since phone interviews are standard for most programs, staff are unclear what other modifications are possible, or how to handle a request for "no interview."	Engage in the interactive process. Staff must determine the specific modification needed to overcome a barrier caused by the disability. Acceptable modifications include: providing interview questions in advance, allowing additional time for responses, or conducting the interview in smaller, multiple sessions. A request for "No Interview" for a mandatory program (like SNAP/TCA) is a fundamental alteration of the program. Staff must deny this specific request and immediately suggest an alternative (e.g., a simplified interview script).
Assessment and Evaluation Services	Staff are unclear how to refer customers for free assessment and evaluation services.	The LDSS must offer a free specialized assessment to the customer. Staff must refer the customer to their local Customer Access Coordinator (CAC) or the Central Office of Employment and Program Equity Civil Rights Officer . A directory of CACs is attached to this AT.

Topic	Scenario	Staff Action and Policy
Individual Decision Tracking (E&E Defect)	When a customer requests multiple accommodations, staff may need to approve one (or more) while also denying one (or more). However, the E&E system may force an all-or-nothing outcome.	All requests must be evaluated and tracked individually. The E&E system currently has a known defect which treats multiple accommodation requests as one request that must be approved or denied <i>in whole</i> . Until this defect is fixed, staff must track the most viable accommodation status (e.g., Pending), while documenting with case narration the individual decision for <i>each</i> requested accommodation in the case file. The interactive process must still occur for any denied request.

SECTION 8: PRACTICAL IMPLEMENTATION EXAMPLES

This table provides practical examples of how staff implement the more complex Reasonable Accommodations.

Reasonable Accommodation	Practical Staff Example	Key Procedural Reminder
Coordinated Services with Outside Agencies	Coordinating with the Division of Rehabilitative Services (DORS) to align the customer's TCA work activities with their DORS-approved vocational plan.	Staff must obtain a signed Release of Information (ROI) or Consent form from the customer before communicating or sharing information with outside agencies.
Modifications to Independence Plans (IP)	A customer with a Learning Disability is in a TCA work activity. Their IP is modified to incorporate: "Vendor will provide all instructions in writing and verbally; all required training quizzes may be completed in two separate sittings."	The IP must incorporate all recommended accommodations from an assessment to ensure goals are attainable.

Reasonable Accommodation	Practical Staff Example	Key Procedural Reminder
Alternative Format Materials	A customer with a Visual Impairment requests the eligibility notice in an alternative format. Available options include: Large Print , Audio Recordings , and electronic files compatible with screen readers.	Always confirm the specific format needed by the customer to ensure they are receiving communication that is as effective as communication with others.
Accommodations in Work Activities	A customer with ADHD is placed in a work assignment. Staff negotiates with the vendor to provide a designated low-distraction workspace and the ability to take two short (5-minute) focus breaks per hour.	This requires instructions for sharing IP accommodations with vendors and monitoring performance.

SECTION 9: FREQUENTLY ASKED QUESTIONS

FAQs for Local Departments and Staff

What is the [Voluntary Resolution Agreement \(VRA\)](#)?

The VRA is an agreement between the U.S. Department of Health and Human Services (HHS), Office for Civil Rights (OCR), and the Maryland Department of Human Services (DHS). The VRA was created to address concerns about disability-based discrimination in Maryland's Temporary Cash Assistance (TCA) program.

What are my responsibilities under this agreement?

1. You must not discriminate against individuals based on having a disability and must provide people with disabilities with equal opportunities to participate in and benefit from DHS programs.
2. You must be prepared to handle requests for reasonable modifications and accommodations.
3. You must properly document all customer requests and interactions related to accommodations or disability.

Can I approve a reasonable accommodation now?

Reasonable accommodations that do not require LDSS resources beyond the case manager's control will be approved and provided without supervisor approval. Examples include:

1. Waiving in-person interviews and performing interviews by phone;

2. Extending deadlines for providing eligibility documents; or
3. Assisting with making medical appointments for DHS programs.

For any accommodation that requires LDSS resources, consult with a supervisor, manager, or [ADA Coordinator](#).

The 566 Letter: Responding to Common Customer Inquiries

As part of DHS's agreement with OCR, 566 Closure Letters were mailed to former TCA participants whose cases closed under code 566 (non-cooperation with the eligibility process) since July 1, 2021. Workers may receive inquiries from these customers. The following are suggested responses to guide those conversations.

What is this 566 letter about?

The 566 Closure Letter informs former customers whose TCA case closed due to non-cooperation with the eligibility process (code 566) that they are entitled to reasonable accommodations to ensure equal access to DHS programs. If the customer was previously denied benefits for non-compliance with program requirements, they may request an assessment for disability and accommodation needs.

What is a "reasonable accommodation"?

A reasonable accommodation is a change to a program rule, policy, or service that provides a person with a disability an equal opportunity to participate in DHS programs. It could be something like:

1. A phone call from DHS telling you information that is in a letter we are about to send to you;
2. Conducting mandatory interviews by phone rather than in person;
3. Extending the deadline to turn in paperwork; or
4. Written materials in Braille or large print.

What should I do now?

1. If you think you have a disability and need accommodation to access benefits, you have the right to a free assessment and evaluation to determine your needs.
2. Contact your [local Department of Social Services office](#). Tell them you received a letter about your 566 closure from DHS and would like:
 - a. To request a reasonable accommodation, and/or
 - b. A review of your case.
3. You have the right to file a complaint if you believe you have been discriminated against by DHS or DHS staff.
 - a. If you believe you have been discriminated against because of your age, ancestry, color, creed, marital status, mental or physical disability, national origin, race; religious affiliation, belief or

opinion; sex, or sexual orientation, you may contact the Office of Employment and Program Equity (OEPE) at 410-767-7861 or at dhroepe@maryland.gov.

- b. If you do not believe that you have been discriminated against, but would like to file a complaint, you may contact the Constituent Services Unit of DHS at 1-800-332-6347.

SECTION 10: RESOURCES & SUPPORT

For support and more information, please refer to the following resources:

1. [Worker How-To-Guide for Reasonable Accommodations](#)
2. [Customer Access Coordinator \(CAC\) Directory](#)
3. [ADA Coordinator Directory](#)
4. [DHS Family Investment Administration Civil Rights Guide \(2023\)](#)
5. [AT #23-13 Civil Rights Compliance with Attachments, Revised](#)
6. [AT #17-12 Civil Rights Compliance](#)
7. [AT #15-14 Meaningful Access to People with Disabilities](#)
8. [OCR/DHS Voluntary Resolution Agreement](#)

Inquiries

Please direct policy questions to FIA Policy by completing the [FIA Policy Information Request Form](#) (internal link). Montgomery County staff may submit their policy questions via email at fia.policy@maryland.gov.

Cc: DHS Executive Staff
Constituent Experience
DHS Help Desk
FIA Management Staff
Office of Administrative Hearings