

Fact Sheet 5: Accommodation

Evidence-Based Disability Employment Practice Recommendations for Canadian Employers

About this fact sheet

This fact sheet presents the accommodation recommendations from An Employer Guide to Disability Employment Practices in Canada (Anyinam et al., 2026), a convergence synthesis of 95 Canadian grey literature documents produced by 53 independent organizations. The full guide covers eight domains across the employment lifecycle. This sheet addresses Accommodation.

The recommendations below are condensed for ease of use. Jurisdictional notes, full source document lists, and detailed quality appraisals appear in Chapter 7 of the full guide.

About the evidence

Canadian federal departments, provincial and territorial human rights commissions, accessibility offices, and national disability organizations all publish guidance for employers. The convergence synthesis identified practices where multiple independent organizations arrived at the same recommendation without coordinating with one another.

Convergence classification reflects how many independent organizations support the practice: Strong (six or more sources), Moderate (four to five sources), Low (three sources). Each supporting document was appraised using the CRAAP framework (Currency, Relevance, Authority, Accuracy, Purpose). The quality flag reports the proportion of sources that scored High on this appraisal: Full confidence (75% or more), Moderate confidence (50–74%), Quality flag (below 50%).

Why accommodation matters

Accommodation is the central element of disability employment practice in Canada and the area with the greatest volume of guidance. The duty to accommodate is a legal obligation under both federal and provincial human rights legislation, and the 30 recommendations in this fact sheet reflect the scope and weight of that obligation. They span the full accommodation lifecycle, from identifying a need and initiating a collaborative process, through documentation, confidentiality, and funding, to ongoing monitoring and dispute resolution. Many of these practices are legal requirements, not optional. Where that is the case, the jurisdictional notes in the full guide identify the applicable obligations.

Recommendations

Recommendation 5.1 Provide a range of accommodation options including modified duties, schedule changes, equipment, and reassignment

Convergence: Strong **Quality:** Full confidence (80%) **Sources:** 40 independent organizations

Offer a broad range of accommodation options tailored to individual needs. These include modified duties, flexible scheduling (staggered start and end times, shorter and more frequent breaks, time off for appointments), ergonomic equipment, assistive technology, remote or hybrid work, changes to the physical workspace, reassignment of non-essential tasks, and sensory accommodations such as noise-reducing headphones, quieter workspaces, adjusted lighting, or cubicle partitions. Provide plain language guides, step-by-step audio or visual instructions, and daily task lists for employees who need them. Consider having a specialized service provider conduct assistive technology assessments, ergonomic evaluations, and worksite accommodation recommendations. Review job requirements and explore ways to allocate tasks more effectively among staff. Match the accommodation to the person, not a one-size-fits-all solution.

Recommendation 5.2 Employer bears ultimate responsibility for the accommodation process

Convergence: Strong **Quality:** Full confidence (84%) **Sources:** 31 independent organizations

The employer bears ultimate responsibility for the accommodation process. This is a legal obligation under federal and provincial human rights legislation, not discretionary good practice. Ensure an accommodation policy and procedure is in place that clearly states the accountabilities of the employer, the manager, and the employee. The duty to accommodate extends beyond the traditional workplace to wherever the employee performs work, including telework and travel. A request for accommodation does not have to be in writing. Self-identification for employment equity purposes is not required to be eligible for accommodation. Identify the resources necessary to fulfil the duty to accommodate in your business and human resources plans. The duty is a shared, multi-party obligation involving the employer, the employee, and, where applicable, the union.

Recommendation 5.3 Engage in a collaborative and interactive accommodation process with the employee

Convergence: Strong **Quality:** Full confidence (86%) **Sources:** 28 independent organizations

Accommodation must be a collaborative process. Sit down with the employee and discuss the specific limitations affecting their work, explore possible accommodations, and arrive at a mutually agreed solution rather than imposing one. Listen to the employee's suggestions and be flexible and creative. If no single solution is obvious, explore combinations. Involve the union representative and HR as needed. The employee should advise the manager about their abilities, functional limitations, and restrictions. Ensure the employee is aware of their responsibilities in the process, including providing documentation from a qualified health care professional when necessary. If agreement cannot be reached, the employer may recommend an option that meets both the worker's accommodation needs and the employer's operational needs, with clear reasons provided.

Recommendation 5.4 Accommodate employees up to the point of undue hardship, supported by evidence

Convergence: Strong **Quality:** Full confidence (89%) **Sources:** 27 independent organizations

Accommodate employees up to the point of undue hardship (the legal limit beyond which an employer is not required to go). This is the legal standard across Canadian jurisdictions, assessed individually based on health, safety, and cost. For large organizations, cost alone is unlikely to constitute undue hardship unless it threatens the survival of the organization. If full accommodation is not possible, offer options that partially meet the person's needs. Do not assume accommodations will be costly: research shows most cost little or nothing, and the resulting improvements in retention and productivity typically exceed the expenditure. If accommodation is not possible due to undue hardship, provide detailed written reasons explaining why. The burden of proof rests with the employer.

Recommendation 5.5 Assess and address accommodation needs on a case-by-case, individualized basis

Convergence: Strong **Quality:** Full confidence (92%) **Sources:** 26 independent organizations

Assess every accommodation need on a case-by-case, individualized basis. Different workers may need different accommodations even if they have the same disability, and a worker's needs may change over time as health, family, or work circumstances evolve. Develop individualized accommodation plans. Offer accessibility passports that support portability across the organization. The type, amount, and source of supporting documentation should be determined case by case. In many cases, a collaborative conversation between the manager and employee can address the need without external documentation. Integrate accommodation needs into future human resources and business planning. Ensure accommodation is provided in a way that respects the person's dignity, privacy, confidentiality, comfort, and autonomy.

Recommendation 5.6 Do not require employees to disclose a specific diagnosis; request only functional limitations and workplace barriers

Convergence: Strong **Quality:** Full confidence (95%) **Sources:** 22 independent organizations

Do not require employees to disclose a specific diagnosis. You are entitled to know whether the worker has a disability requiring accommodation, what barriers they experience, and what their accommodation needs are. You are not entitled to a diagnosis, treatment details, or prognosis beyond what is necessary to implement the accommodation. Focus on functional limitations and restrictions relevant to the job. Minimize the need for disclosure of personal or medical information. Where possible, make accommodations available without requiring medical documentation. When documentation is necessary, the employer should cover the cost of obtaining it. A change in the employee's supervisor or senior management is not a valid reason to request new documentation or reassess existing accommodations.

Recommendation 5.7 Review and monitor accommodation measures on a regular basis

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 19 independent organizations

Review accommodation measures regularly to confirm they continue to meet the employee's needs. Schedule check-ins monthly during the first three months, then at least quarterly. At minimum, review annually. Triggers for a review include changes in the employee's health, changes in job duties, new technology, a new work location, or a new supervisor. If the accommodation is not working, discuss why and whether modifications might help. Where possible, keep the employee at work while waiting for modifications. Build pre-scheduled follow-up meetings into the accommodation plan. A named individual should be responsible for monitoring all requests to ensure the policy is consistently applied.

Recommendation 5.8 Exercise the duty to inquire when aware or ought to be aware of a possible accommodation need

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 17 independent organizations

When you are aware, or should reasonably be aware, that an employee may need accommodation, you have a duty to inquire (the legal obligation to proactively ask about possible accommodation needs). Do not wait for a formal request. If you notice changes in performance, attendance, or behaviour that could be linked to a disability, approach the conversation with sensitivity. Proactively demonstrate that your organization can be trusted with personal information. The duty to inquire exists even when the employee has not asked for help. Research solutions and seek expert advice when needed.

Recommendation 5.9 Review workplace policies, practices, and standards regularly to identify and remove systemic barriers

Convergence: Strong **Quality:** Full confidence (76%) **Sources:** 17 independent organizations

Regularly review your workplace policies, practices, and standards to identify and remove systemic barriers. Adopt inclusive design approaches: the more inclusive your tools and processes are at the outset, the less need there is for individual accommodations. Include persons with disabilities early and often in developing and updating policies, processes, products, and services. Apply an intersectional accessibility lens to training, work experience programmes, and HR processes. Use assessment tools that do not create systemic barriers to employment. Consider environmental and social factors that create disabling conditions.

Recommendation 5.10 Keep accommodation records confidential and separate from personnel files

Convergence: Strong **Quality:** Full confidence (94%) **Sources:** 16 independent organizations

Keep all accommodation records confidential and separate from personnel files. Share personal information about an employee's accommodation strictly on a need-to-know basis and only with the employee's informed consent. Talk with the employee about how the implementation of their accommodation will be communicated to others. The focus of any shared information should remain on the barriers the employee faces and the supports needed, not on the nature of the disability. Do not disclose details of the employee's condition to coworkers, clients, or other parties unless the employee agrees.

Recommendation 5.11 Use the least intrusive means when requesting medical or supporting information

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 15 independent organizations

Use the least intrusive means when requesting medical or supporting information. Seek only functional limitations and restrictions relevant to the job. Do not request a specific diagnosis unless absolutely necessary. Be sensitive to the employee's beliefs and values. Limit requests to physicians and be open to accepting information from other qualified professionals. If the employee has already provided documentation or previously received an accommodation, do not request new information from external specialists unless job duties have materially changed. The employee does not have to share an entire professional document; the sections about functional limitations and professional recommendations are usually sufficient.

Recommendation 5.12 Document accommodation plans in writing, signed by all parties

Convergence: Strong **Quality:** Full confidence (93%) **Sources:** 15 independent organizations

Put accommodation plans in writing and have all parties sign. The written plan should document the specific supports agreed upon, review timelines, the process for requesting changes, schedules, duties, and workplace adjustments. Include training on any adjusted equipment or systems. Document the entire accommodation process: the request, information gathered, options explored, the accommodation provided, and follow-up outcomes. Keep this documentation confidential and separate from human resources files.

Recommendation 5.13 Accept and respond to accommodation requests in good faith and in a timely manner

Convergence: Strong **Quality:** Full confidence (92%) **Sources:** 13 independent organizations

Accept accommodation requests in good faith and respond in a timely manner. Treat the person respectfully throughout. Respond within a reasonable period proportionate to the complexity of the request. Only request supporting information when absolutely required to implement the accommodation. Acknowledge requests promptly and ensure accommodations are in place before any evaluation of the worker. Provide temporary accommodations while a request is being finalized. Delays should be limited; excessive delays may be found to have breached the duty to accommodate.

Recommendation 5.14 Train managers, supervisors, and HR staff on accommodation obligations and processes

Convergence: Strong **Quality:** Full confidence (85%) **Sources:** 13 independent organizations

Train all managers, supervisors, and HR staff on accommodation obligations and processes. Training should cover the duty to accommodate, the duty to inquire, undue hardship, confidentiality, human rights principles, and practical skills for conducting accommodation conversations. Ensure managers are familiar with all aspects of the accommodation policy. Include ableism-awareness content that helps managers understand how ableism shows up in daily organizational processes and HR practices. Provide training on disability awareness and

inclusion, including how to interact appropriately with persons with disabilities. This training should be mandatory, not optional.

Recommendation 5.15 Provide flexible work arrangements as an accommodation or inclusive practice

Convergence: Strong **Quality:** Full confidence (77%) **Sources:** 13 independent organizations

Offer flexible work arrangements to all employees as both an accommodation measure and an inclusive practice. Options include flexible scheduling, remote or hybrid work, shorter and more frequent breaks, staggered start and end times, and time off for appointments that can be made up. Provide productivity supports to all employees without requiring disclosure, such as ergonomic desk setups and adaptable work environments. Lead with empathy and take a human-centred approach. Accommodation conversations should be treated as routine workplace discussions, no different in character from scheduling or leave requests.

Recommendation 5.16 Employer is responsible for funding accommodation measures

Convergence: Strong **Quality:** Full confidence (83%) **Sources:** 12 independent organizations

The employer is responsible for funding accommodation measures. Consider a centralized funding source for accommodations to alleviate operational budget constraints, separate financial questions from hiring and promotion decisions, and provide anonymity for requesting employees. Be aware of available government funding programmes that offset accommodation costs. If you require medical information or assessments beyond what the employee has provided, you must bear the cost. Research consistently shows that most accommodations are low-cost or free.

Recommendation 5.17 Develop and maintain a written workplace accommodation policy

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 10 independent organizations

Develop and maintain a written workplace accommodation policy. The policy should outline the process for requesting, assessing, and providing accommodations, designate who is responsible, explain how decisions are made, and set timelines. Include a statement of your organization's commitment to diversity, equality, and inclusion. Make the policy a practical tool that managers and workers can turn to for a consistent approach. Include steps for dispute resolution. The policy should be an evolving document, reviewed at least annually and updated as needed.

Recommendation 5.18 Recognize mental health conditions as disabilities requiring accommodation

Convergence: Strong **Quality:** Full confidence (89%) **Sources:** 9 independent organizations

Recognize mental health conditions, neurodiversity, and episodic disabilities (conditions that come and go over time, such as multiple sclerosis or some forms of arthritis) as disabilities requiring accommodation. An employer's understanding of accommodation must extend beyond

visible and permanent physical disabilities. Interview formats may need to be adapted for candidates with mental health disabilities. Promote psychological safety in the workplace so employees feel comfortable disclosing mental health needs. Address stigma directly through training and awareness programmes. Seek expert advice when a disability is complex, has variable manifestations, or affects cognitive functioning.

Recommendation 5.19 Reassign to alternative position when the current role cannot be accommodated

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 7 independent organizations

When an employee's current role cannot be accommodated, reassign them to an alternative position for which they are qualified. Follow a hierarchy: first, return to the current position with modifications; second, temporary alternate duties; third, permanent reassignment to another position within the organization. Employees who cannot return to their substantive position may be placed on a priority placement list for suitable vacancies. Use best efforts to find a position that optimizes earnings potential, minimizes disruption, and preserves dignity.

Recommendation 5.20 Establish an appeal or complaint process for accommodation decisions

Convergence: Strong **Quality:** Full confidence (100%) **Sources:** 6 independent organizations

Establish an appeal or complaint process for accommodation decisions. If an employee has been denied accommodation, is unsatisfied, or believes the request was not handled according to policy, they should be able to request a review. Schedule a review meeting to answer questions, clarify misunderstandings, and ensure the policy has been properly applied. If a dispute cannot be resolved internally, the employee may file a complaint with the applicable human rights commission. Encourage discussion before a formal grievance becomes necessary.

Recommendation 5.21 Provide temporary or interim accommodation while a request is being processed

Convergence: Strong **Quality:** Moderate confidence (67%) **Sources:** 6 independent organizations

Provide temporary or interim accommodation while a formal request is being processed. Employees do not need a prolonged absence before receiving accommodations. Appropriate and timely accommodations can prevent injuries and illnesses from occurring in the first place. Treat accommodation requests as presumptively valid and do not permit informal gatekeeping of approved supports. Where permanent accommodation cannot be immediately provided, interim measures should bridge the gap.

Recommendation 5.22 Publish and distribute the accommodation policy in accessible formats to all employees

Convergence: Moderate **Quality:** Full confidence (100%) **Sources:** 5 independent organizations

Publish your accommodation policy in accessible formats on the organization's website, intranet, and in employee handbooks. Share it with external contractors. Proactively inform all

workers about their right to request accommodations and the process for doing so, rather than waiting for employees to ask. Communicate through multiple channels: onboarding materials, internal platforms, and manager training. Inform all job candidates and employees that accommodation measures are available.

Recommendation 5.23 Establish centralized coordination, governance, and continuous improvement for accommodation

Convergence: Moderate **Quality:** Full confidence (100%) **Sources:** 5 independent organizations

Establish centralized coordination for accommodation. Designate a unit or individual responsible for overseeing accommodation requests, ensuring consistency across the organization, and tracking outcomes. Use disability-appropriate metrics such as retention rates, satisfaction, psychological safety, and accommodation availability and timelines. Establish internal mechanisms for continuous improvement through ongoing monitoring and evaluation. Consider a centralized accessibility supports fund to address needs efficiently and remove financial disincentives from hiring and promotion decisions.

Recommendation 5.24 Provide medical information to health care providers to support accurate functional assessments

Convergence: Moderate **Quality:** Full confidence (100%) **Sources:** 4 independent organizations

When engaging health care providers in the accommodation process, provide them with a description of the employee's job functions and responsibilities, the work schedule, whether the position is safety-sensitive, and any other relevant workplace demands. This information helps clinicians provide accurate functional assessments and targeted recommendations. Communicate with health care providers with the worker's consent.

Recommendation 5.25 Use the GC Workplace Accessibility Passport or similar portability tools

Convergence: Moderate **Quality:** Full confidence (75%) **Sources:** 4 independent organizations

Use the Government of Canada Workplace Accessibility Passport or a similar tool to document barriers an employee faces and the agreed-upon solutions. The passport allows employees to carry their accommodation information with them when they change positions, supervisors, or locations, preventing the need to renegotiate supports each time. A completed passport should be sufficient documentation in most situations to support workplace accommodation requests. This approach streamlines the process and reduces the burden on employees who would otherwise need to restart the accommodation process with each organizational change.

Recommendation 5.26 Provide wraparound supports and external resources beyond workplace accommodations

Convergence: Moderate **Quality:** Quality flag (25%) **Sources:** 4 independent organizations

Look beyond workplace-only accommodations. Employees facing barriers may also need access to wraparound supports such as transportation assistance, child care, and mental health services. Designate a contact person who can be reached immediately when issues arise.

Provide post-hire supports and ongoing access to expertise on disability-related issues. Connect with government and community programmes that fund or supplement workplace accommodations. Recognize that sustainable employment often depends on supports outside the workplace.

Recommendation 5.27 Inform and involve coworkers appropriately while maintaining privacy

Convergence: Moderate **Quality:** Full confidence (100%) **Sources:** 4 independent organizations

Share information about an employee's accommodation with coworkers only when necessary and only with the employee's consent. Decide together what colleagues need to know. Follow the employee's lead about whether they want to share information themselves or have their manager do it. Ensure all employees understand their responsibility to respect the accommodation requirements and privacy of others. When accommodation affects workflows or team arrangements, communicate the changes clearly without revealing personal medical information.

Recommendation 5.28 Ensure physical accessibility of workplace facilities and workstations

Convergence: Moderate **Quality:** Moderate confidence (50%) **Sources:** 4 independent organizations

Ensure your physical workspace is accessible. Provide workstations at accessible heights with adequate space for manoeuvring. Ensure accessible routes to all work-related areas including meeting rooms, break rooms, and washrooms. Provide accessible off-street parking that is wider, closer to the entrance, and clearly marked. Maintain accessible pathways free of obstacles. Provide ergonomic workstations adjustable to individual needs. Ensure adequate lighting and reduce glare. Minimize background noise and distractions where possible.

Recommendation 5.29 Consider informal accommodations before initiating a formal process

Convergence: Low **Quality:** Full confidence (100%) **Sources:** 3 independent organizations

Consider informal accommodations before launching a formal process. A temporary change in hours, an alternate work location, or a minor workspace adjustment can often address the need without paperwork. This preserves the employee's dignity and avoids unnecessary bureaucracy. Maintain the principle that work-related needs should be addressed as simply and respectfully as possible. If the informal solution proves insufficient, transition to the formal process.

Recommendation 5.30 Use independent medical examinations only as a last resort in specific circumstances

Convergence: Low **Quality:** Moderate confidence (67%) **Sources:** 3 independent organizations

Use independent medical examinations (IMEs) only as a last resort, when all other means of obtaining sufficient medical information have been exhausted. An IME cannot generally be a condition of employment or a first step in the accommodation process. An employee's obligation is to cooperate with reasonable requests, including responding to an IME when there is a

reasonable basis for it, such as when available medical information is insufficient, conflicting, or unclear. The employer must cover the cost.

For the full evidence base

Each recommendation in this fact sheet is drawn from Chapter 7 of *An Employer Guide to Disability Employment Practices in Canada*.

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