

January - March 2026 | Vol. 18, Issue 1

@work™

Official Publication of DMEC

**Your path to people-first
accommodation and leave
management**

Employer Compliance



Supervisors: The Greatest Opportunity or Risk in Your ADA Interactive Process

By Rachel Shaw, President, Rachel Shaw Inc.

When an employee requests a workplace accommodation under the Americans with Disabilities Act (ADA), the first and most influential touchpoint is often the supervisor, not human resources (HR), not a disability compliance coordinator (DCC), and not legal. Supervisors sit at the center of the disability interactive process. They are individuals who understand the work and the workflow, and also understand what is truly essential for the people they manage.

DCCs and HR professionals guide the process and anchor it in legal and procedural integrity. But the quality of the information you gather, the feasibility of potential accommodations, and the success or failure of disability compliance programs depend heavily on supervisor involvement. This makes the supervisor your organization's greatest asset or its greatest risk. Training the supervisor is not optional. It is strategic risk management.

Why Supervisors Matter

The ADA's emphasis on essential job functions places supervisors in a pivotal role. They possess valuable knowledge about day-to-day responsibilities, frequency of tasks, workflow patterns, and environmental realities. They know which job functions are consistent, which fluctuate seasonally, and which may appear essential but are marginal in practice.

Supervisors also understand the practical constraints of the worksite and can identify which accommodations are likely to work. Job descriptions and essential function documents cannot fully capture this level of detail, which is why supervisors' practical insight is indispensable.

While this knowledge is valuable, supervisors' close proximity to their employees introduces risk. Supervisors, like all humans, carry conscious and unconscious biases. If they perceive an employee as difficult or underperforming, those beliefs may influence their willingness to explore reasonable accommodations and their participation in the interactive process. Conversely, supervisors may push for accommodations that go beyond what is legally required simply because they want to support employees they favor.

And once an accommodation is approved, its success still hinges on supervisors, who implement the accommodation, monitor it, adjust it as needed, and ensure it is effective. Their engagement directly shapes employee experience, team functioning, and organizational compliance.

The Importance of Training

Given the influence supervisors have, it is costly for organizations to leave them unprepared for ADA-related events. Effective ADA supervisor training is not just a best practice — it is a compliance safeguard. Training should include the following:

- Foundational overview of the ADA and the organization's obligation to provide reasonable accommodations. Supervisors do not need to be experts, but they must understand that organizations are required to offer reasonable accommodations and the reasons behind these requirements.
- Clear explanation of the interactive process and what employees can expect. Demystify the steps of the process for



supervisors. Transparency increases consistency and confidence.

- Detailed outline of supervisors' role and the role of others in the organization so there is a clear delineation of when to refer an employee, what not to discuss, and so on. Supervisors should provide accurate job function data, participate meaningfully in interactive discussions, and help implement accommodations. HR (and legal, when appropriate) should guide decisions. Supervisors should not make medical judgments or determine accommodations independently.

The Bottom Line

Supervisors are essential partners in creating equitable, consistent, and legally compliant disability accommodation practices. Their accuracy, engagement, and mindset can advance the process—or derail it.

Organizations should invest in training early for new supervisors and offer annual refreshers for experienced leaders. When supervisors understand their role, the interactive process becomes more consistent, defensible, and human. Your supervisors are already at the center of the process. You determine whether they become your strongest advantage or your greatest risk.