



DEPARTMENT OF DEFENSE EDUCATION ACTIVITY  
HEADQUARTERS  
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ALEXANDRIA, VA 22350-1400

January 19, 2018

MEMORANDUM FOR DODEA ALL

FROM: DIRECTOR, DEPARTMENT OF DEFENSE EDUCATION ACTIVITY

SUBJECT: Directive-Type Memorandum (DTM) 18-DMEO-003 - Annual Policy Statement on Personal Assistance Services

References: Code of Federal Regulations, Title 29  
Department of Defense Education Activity Pamphlet 12-EEO-01, "Procedures to Facilitate the Provision of Reasonable Accommodation," March 1, 2013  
Office of Personnel Management Standard Form 256, "Self Identification of Disability," revised October 2016

**Purpose.** This DTM is to articulate the Department of Defense Education Activity's (DoDEA) commitment to ensuring equal employment opportunity (EEO) and access in employment for qualified individuals with severe targeted disabilities.

This DTM is effective January 18, 2018 and will expire twelve (12) months from the date of signature.

**Applicability.** This DTM applies to the Office of the Director, DoDEA; the Principal Deputy Director and Associate Director for Academics, DoDEA; the Associate Director for Financial and Business Operations, DoDEA; the Chief of Staff, DoDEA; the Director for Student Excellence, DoDEA Americas/Associate Director for Performance and Accountability (formerly the Director, Domestic Dependent Elementary and Secondary Schools, and Department of Defense Dependents Schools, Cuba (DDESS/DoDDS-Cuba)); the Director for Student Excellence, DoDEA Europe (formerly the Director, Department of Defense Dependents Schools, Europe (DoDDS-E)); the Director for Student Excellence, DoDEA Pacific (formerly the Director, Department of Defense Dependents Schools, Pacific, and Domestic Dependent Elementary and Secondary Schools, Guam (DoDDS-P/DDESS-Guam)); (referred to collectively in this Issuance as "DoDEA Region Directors for Student Excellence"); and all DoDEA region, district, community, and school leaders and support staff.

**Definitions.** See Glossary.

**Policy.** In accordance with Part 1614.203 of Title 29, Code of Federal Regulations, DoDEA is mandated to provide Personal Assistance Services (PAS), defined as assistance in performing personal daily living activities provided for an employee who would typically perform such activities on their own if they did not have a severe form of targeted disability and which services would not otherwise be provided as a work-related Reasonable Accommodation (RA). PAS includes assistance with activities of physical, sensory, mental, or cognitive tasks,

such as personal care (i.e., toileting or eating and drinking), assisting with physical tasks (i.e., accessing out-of-reach supplies or with on-the-job travel) or cognitive tasks (i.e., clarifying communications distorted by verbal impairments). PAS does not include providing medical care.

**Responsibilities.** An employee must inform their supervisor, orally or in writing, if they have a targeted disability that prevents them from being able to manage their personal activities at work or participate in work-related travel on their own. All supervisors are required to respond promptly to any requests for PAS in accordance with this Issuance.

**Procedures.** PAS requests are administered through the RA process. To request or process a request for PAS, employees and supervisors should follow the procedures found in DoDEA Pamphlet 12-EEO-01, *Procedures to Facilitate the Provision of Reasonable Accommodation*, located on the DoDEA Diversity Management and Equal Opportunity (DMEO) webpage at [www.dodea.edu/Offices/DMEO](http://www.dodea.edu/Offices/DMEO).

To be eligible for PAS, an employee must have a severe targeted disability and otherwise be able to safely perform the essential functions of their job once PAS and any required companion RA have been provided. PAS shall be provided only when the employee is working and during any work-related travel. PAS is not available to assist with an employee's commute to their regular work site, but is available during telework. Any request for PAS may be denied if it would impose undue hardship on the Activity.

The process for requesting PAS and determining whether such services should be provided are the same as for RA, as is DoDEA's right to deny requests when provision of the services would impose an undue hardship. DoDEA has the discretion to use Federal employees, independent contractors, or a combination of employees and contractors for providing PAS. Where DoDEA is hiring a PAS provider who will be assigned to a single individual and that individual prefers a particular provider, DoDEA must give primary consideration to the employee's choice to the extent permitted by law.

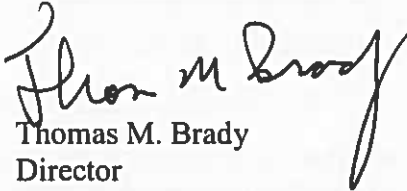
Additional information regarding PAS or RA can be found at the DoDEA DMEO webpage located at [www.dodea.edu/Offices/DMEO/accommodations.cfm](http://www.dodea.edu/Offices/DMEO/accommodations.cfm) or by contacting the Chief, Diversity and Inclusion Branch, by phone at (571) 372-0970 or by email at [Disability@hq.dodea.edu](mailto:Disability@hq.dodea.edu).

Requesting PAS is a protected activity under Part 1614.103 of Title 29, Code of Federal Regulations. Any employee who believes they have been discriminated against, or made subject to retaliation, related to their request for PAS may initiate a complaint by contacting a DMEO EEO representative within forty-five (45) calendar days of the occurrence. More information and points of contact can be found at the DoDEA DMEO web page located at [www.dodea.edu/Offices/DMEO/compliance.cfm](http://www.dodea.edu/Offices/DMEO/compliance.cfm) or by contacting the Chief, Resolution & Compliance, by phone at (571) 372-0966 or by email at [EEO.Complaints@hq.dodea.edu](mailto:EEO.Complaints@hq.dodea.edu).

In accordance with Part 1614 of Title 29, Code of Federal Regulations, this policy is official and is posted on the DoDEA Issuances Website.

Information Collection Requirements. This DTM may result in the collection of information due to its policy and procedures. Any collection of information must follow all applicable Federal, DoD, and DoDEA regulations, policies, and guidance.

Releasability. Cleared for public release. Available on the DoDEA Policy Website.

  
Thomas M. Brady  
Director

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GLOSSARY

PART I: ABBREVIATIONS AND ACRONYMS

|      |  |
|------|--|
| DMEO | Diversity Management and Equal Opportunity |
| DTM  | Directive-Type Memorandum                  |
| EEO  | Equal Employment Opportunity               |
| PAS  | Personal Assistance Services               |
| RA   | Reasonable Accommodation                   |

PART II. DEFINITIONS

Unless otherwise noted, these terms and their definitions are for the purpose of this Issuance.

disability. A person with a disability is one who has a physical or mental impairment that substantially limits one or more major life activities, or has a record of such an impairment that substantially limits one or more major life activities.

Personal Assistance Services. PAS is assistance with performing activities of daily living that an individual would typically perform if they did not have a severe targeted disability and which services would not otherwise be required as RA. Examples of PAS include removing and putting on clothing, eating, and using the restroom. PAS does not include providing medical care.

Reasonable Accommodation. RA is a modification or adjustment in the manner in which work is customarily done in the performance of a job, an employment practice, or the work environment that makes it possible for a qualified individual with a disability to enjoy equal employment opportunity. Examples of accommodations may include acquiring or modifying equipment or devices; modifying training materials; making facilities readily accessible; and modifying work schedules.

severe targeted disability. The term "severe targeted disability" refers to a targeted disability so debilitating it renders an individual unable to perform personal daily activities on their own.

targeted disability. A "targeted disability" is a disability listed under the category of "Targeted Disability" listed on the Office of Personnel Management (OPM) Standard Form 256 "Self Identification of Disability," located on the OPM Website at <https://www.opm.gov>.

undue hardship. Undue hardship refers to a significant difficulty or expense incurred or anticipated by DoDEA in providing a specific RA or PAS. It refers not only to financial difficulty, but to accommodations that are unduly extensive, substantial, or disruptive, or that would fundamentally alter the nature of operations or otherwise undermine the Activity's ability to serve its mission.