



PWFA Accommodation Request Packet

Handle pregnancy-related accommodation requests under the Pregnant Workers Fairness Act — quickly, interactively, and in writing.

WHAT THIS HELPS YOU DO

Use this packet when any pregnancy-related limitation surfaces, to run a compliant PWFA interactive process: capture the request, identify options, avoid the forbidden responses, and document a timely decision.

WHEN TO USE THIS DOCUMENT

- When a pregnant employee requests any change — seating, water, lifting, schedule, leave
- When a supervisor learns of pregnancy-related work limitations, however casually
- Before requiring any medical documentation for a pregnancy accommodation
- Before placing a pregnant employee on leave 'for her own good'
- When postpartum, lactation, or related medical needs arise

WHAT THIS DOCUMENT HELPS PREVENT

- PWFA violations from slow, informal, or undocumented responses
- Forced leave when a reasonable on-the-job accommodation exists
- Unnecessary medical documentation demands for obvious needs
- Essential-function fights that ignore the PWFA's temporary-suspension rule
- Retaliation exposure when accommodation and discipline collide

Faulkner HR Solutions focuses on the system behind the people problem. This tool is designed to help employers slow down the decision, identify the risk, and create proof before the issue becomes a claim, complaint, turnover event, or credibility problem.

BEFORE YOU START: READINESS CHECKLIST

Gather the following before working through this document. Incomplete inputs are one of the most common reasons employer decisions fail under later scrutiny.

Have it	Input	Notes / location
<input type="checkbox"/>	Employee name and role	
<input type="checkbox"/>	Date of incident, request, or separation	



Have it	Input	Notes / location
<input type="checkbox"/>	Supervisor involved	
<input type="checkbox"/>	Policy or handbook section that applies	
<input type="checkbox"/>	Prior documentation on file	
<input type="checkbox"/>	Pay records, if applicable	
<input type="checkbox"/>	Relevant emails, texts, notes, or complaints	
<input type="checkbox"/>	Decision-maker name	
<input type="checkbox"/>	Deadline, if applicable	



PWFA REQUEST PACKET

The PWFA covers known limitations related to pregnancy, childbirth, or related medical conditions — even minor ones, even without a disability. Speed and interaction are the compliance standard.

Part 1 — Request Intake

Employee name and position	
Date the limitation became known, and to whom	
How it surfaced (request, medical note, supervisor observation)	
Limitation described (employee's words)	
Accommodation requested, if any specific one	

Part 2 — Common Accommodation Options

The EEOC treats several accommodations as almost always reasonable — grant these without medical documentation.

Fits?	Option	Notes
<input type="checkbox"/>	Carrying or keeping water nearby	
<input type="checkbox"/>	Additional restroom, food, or rest breaks	
<input type="checkbox"/>	Sitting/standing modifications	
<input type="checkbox"/>	Lifting limits or help with physical tasks	
<input type="checkbox"/>	Schedule changes, later start times, or telework	
<input type="checkbox"/>	Temporary transfer or light duty	
<input type="checkbox"/>	Time off for prenatal, postpartum, or related appointments	
<input type="checkbox"/>	Lactation space and break accommodations	

Part 3 — Essential Functions Review

Under the PWFA, an employee can be qualified even if unable to perform an essential function — when the inability is temporary and the function can be suspended, with the essential function reasonably expected to return within roughly 40 weeks.

Essential function(s) affected	
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Expected duration of the limitation	
Can the function be temporarily suspended or redistributed? How?	
What work remains available during the suspension?	

Part 4 — Interactive Dialogue Record

Date	Participants	What was discussed / offered / agreed

Part 5 — Forbidden Responses Check

The PWFA explicitly prohibits each of the following. Confirm none is happening here.

Avoided	Prohibited response	Notes
<input type="checkbox"/>	Requiring leave when another reasonable accommodation would work	
<input type="checkbox"/>	Requiring the employee to accept an accommodation not arrived at interactively	
<input type="checkbox"/>	Denying employment opportunities based on the need for accommodation	
<input type="checkbox"/>	Retaliating against the employee for requesting or using an accommodation	
<input type="checkbox"/>	Demanding medical documentation for obvious or self-evident needs	

Part 6 — Undue Hardship Review (only if denying)

Accommodation considered and cost/impact analysis	
Why it imposes significant difficulty or expense (specific facts)	
Alternatives offered instead	
Reviewed by (HR / counsel) before denial communicated	



Part 7 — Decision and Follow-Up

Accommodation granted (describe precisely)	
Start date and expected duration	
Supervisor briefed on implementation (date)	
Follow-up / reassessment dates	
Written confirmation provided to employee (date)	

Role	Name / signature	Date
HR reviewer		
Employee acknowledgment		
Decision authority		

STOP AND REVIEW BEFORE ACTING

If any statement below is true, pause. Get the decision reviewed by HR, counsel, or Faulkner HR Solutions before you act.

- Anyone has suggested the employee 'just go on leave' before on-the-job options were explored.
- Medical documentation is being demanded for a need that is obvious.
- The response has taken more than a few days for a simple request.
- Discipline for attendance or productivity is running in parallel with the accommodation request.
- The accommodation conversation happened but nothing was written down.
- The employee is being steered out of promotion, training, or assignments 'because of her condition.'

MINIMUM DOCUMENTATION STANDARD

Before this file is closed, the employer should be able to answer every question below and point to where the proof lives.

Question	Your answer / where the proof is stored
What happened?	
When did it happen?	



Question	Your answer / where the proof is stored
Who observed or reported it?	
What policy, standard, deadline, or expectation applies?	
What decision was made?	
Who had authority to make the decision?	
What alternatives were considered?	
What risk was reviewed?	
What follow-up is required?	
Where is the proof stored?	

COMMON MISTAKES

1. Treating the PWFA like the ADA and demanding a 'disability' — pregnancy limitations need not be disabilities.
2. Making leave the first offer instead of the last resort.
3. Papering the employee with medical documentation requests for a water bottle or a stool.
4. Assuming inability to perform one essential function ends the analysis — the PWFA's temporary suspension rule says otherwise.
5. Leaving the 'interactive process' as one hallway chat with no record.
6. Forgetting state and local pregnancy accommodation laws that may go further.

WHAT TO DO NEXT

Implement the accommodation, confirm it in writing, calendar the reassessment date, and store medical information in the confidential medical file. If a denial is on the table for any reason, get the file reviewed before the denial is communicated — PWFA denials are enforcement priorities.

Before you terminate, deduct, discipline, classify, or respond, get the decision reviewed.

Call 210.446.8730 or email thomas@faulknerhrsolutions.info.



Before you process payroll, terminate, classify, deduct, or respond to a claim, get the decision reviewed.

Need help applying this to a real workplace decision?

Faulkner HR Solutions helps Texas employers, nonprofits, municipalities, and growing businesses fix the people systems behind recurring workplace problems.

If this document raised a risk flag, do not guess your way through the next step.

Call: 210.446.8730

Email: thomas@faulknerhrsolutions.info

Website: faulknerhrsolutions.info

DISCLAIMER

This resource is provided for general employer education and planning purposes. It is not legal advice and does not create an attorney-client relationship. Employment laws, agency guidance, and local requirements may change. Employers should review the facts of each situation before acting and consult appropriate HR or legal counsel when needed.