Supporting Employees with Traumatic Brain Injuries (TBIs)

# Course Objectives and Content

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* Basics on Traumatic Brain Injury (TBI)
* Limitations as a result of TBI

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* Disclosure for job applicants and existing employees
* Workplace strategies

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* What is a reasonable accommodation?
* Accommodation examples for individuals with a TBI
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# Section 1: Introduction

## What does this section include?

* Basics on Traumatic Brain Injury (TBI)
* Signs and symptoms
* Limitations as a result of TBI

## [Next Slide--Video]

Interview with Nicholas Mehrnoosh, Program Specialist, Eastern Washington University:

“First off, TBI stands for traumatic brain injury, and when I talk about a traumatic brain injury, what I'm referring to is an external force striking the skull and causing brain damage.”

Interview with Gloria Kraegel, Executive Director, Brain Energy Support Team:

“Traumatic brain injury is a trauma to the brain. It can either be external trauma due to blunt force trauma, car accident, something like that. It could be internal. Some sort of aneurysm, anoxia from surgery.”

Nicholas Mehrnoosh: “Somebody tripping and falling and hitting the side of a table. Somebody getting clonked on the head from a fallen tree branch. The thing about traumatic brain injury is that it can happen in almost any scenario, in any instance. Whether you're at work, school, at home, by yourself in the middle of the woods, a traumatic brain injury can occur. All that has to happen is your head being jostled and your brain getting slightly damaged. 20 to 25% of individuals across the United States have very likely experienced traumatic brain injury at least once in their lifetime.

Gloria Kraegel: “Every 21 seconds somebody sustains a traumatic brain injury.”

## Traumatic Brain Injury (TBI)

The Centers for Disease Control and Prevention (CDC) define a traumatic brain injury (TBI) as:

“A disruption in the normal function of the brain that can be caused by a bump, blow, or jolt to the head, or penetrating head injury.”[[1]](#footnote-1)

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Many individuals (in particular, transitioning veterans) suffer from the effects of Traumatic Brain Injury (TBI).

Based on 2013 estimates, about 2.8 million brain injuries occur each year.

This means 9 in 1,000 people experience a brain injury every year.[[2]](#footnote-2)

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The top three causes of TBI include car accidents, firearms, and falls.

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Many individuals with a TBI will recover within a few weeks or months and return to their usual life.

Some will experience challenges for many years or the rest of their lives.

Employers can play a vital role in these individuals’ recovery by recognizing the challenges associated with TBI and making adjustments and/or reasonable accommodations to help ensure workplace success.

## [Next Slide--Video]

Interview with Robin Spicuzza, Administrative Assistant, Brain Energy Support Team:

“Most people kind of think of traumatic brain injury as somebody that shows symptoms of not being able to function or having issues talking or coming up with thoughts, so that it's real visible. And really, brain injury is invisible and people that have it on the milder spectrum tend to kind of, try to mask it, and so TBI is truly an invisible injury, and there's all different spectrums.”

## Understanding TBI

Some signs or symptoms of a TBI may appear immediately after the traumatic event, while others may appear days or weeks later.

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The symptoms of a mild TBI may include:

* Loss of consciousness for thirty minutes or less;
* Headache;
* A state of being dazed and confused;
* Mood changes;
* Memory or concentration problems.

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Even with a mild TBI, the consequences to a person’s life can be dramatic.

An individual who is suddenly experiencing job-threatening headaches, concentration problems, and moodiness may not associate these changes with a recent fender-bender or bump to the head.

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The symptoms of moderate to severe TBI may include:

* Profound confusion;
* Slurred speech;
* Sensory difficulties;
* Perceptual issues;
* Chronic pain;
* Lack of coordination.

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Incorporating principles of good cognitive health can assist in recovery from TBI. These include:

* Physical activity;
* Challenging the mind by learning something new;
* Maintaining plenty of interaction with other people;
* Managing stress and finding positive ways of coping;
* Being mindful of diet and sleep habits.[[3]](#footnote-3)

## [Next Slide]

Recovery from a TBI may take weeks, months, or years.

It is important for individuals with TBIs to return to former roles and activities. This provides motivation and stimulates the rehabilitation process.

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About 85% of people with TBIs develop symptoms that eventually resolve; 15% have lasting difficulties.[[4]](#footnote-4)

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Although everyone is different, people with TBIs may experience some of the limitations listed below:

* Cognitive changes: Difficulty remembering or difficulty in decision making
* Perceptual problems: Difficulty with spatial relations or seeing only a portion of visual field
* Behavior changes: Reduced awareness of deficits or limitations
* Emotional changes: Feelings of sadness, frustration or loss
* Changes in communication: Speech difficulties, initiating a conversation or following a conversation

## [Next Slide—Video]

Interview with Nicholas Mehrnoosh, Program Specialist, Eastern Washington University:

“If you have an employee, for example, that has a traumatic brain injury, one of the things that you need to understand is that each injury is different and each person is different. One person over here may have, you know, light sensitivity issues, while another person has noise sensitivity issues. And so you have to think about it in a very person-centric attitude, in the sense that you have to not only understand that they need reasonable accommodations, true, but those reasonable accommodations aren't gonna fit inside a box. You're not gonna necessarily be able to list them out on a sheet of paper and apply that to just everybody.”

## End of Section Quiz

Question 1/3

Multiple Choice (Select One): Based on 2013 estimates, how many brain injuries occur in the U.S. each year?

* 2,800
* 280,000
* 2.8 million

Answer: 2.8 million. Based on 2013 estimates, about 2.8 million brain injuries occur each year.

## [Next Slide]

Question 2/3

True or False: Symptoms of TBI may not be present or noticed at the time of injury.

Answer: True. The symptoms of a TBI may be delayed days or weeks after an injury and are often subtle.

## [Next Slide]

Question 3/3

True or False: All people who have a TBI have the same limitations.

Answer: False. TBI is a complex injury with a broad range of symptoms.

## Section Wrap Up

Nine in every 1,000 people experience a brain injury every year.

Every injury is unique. The severity and the duration of the effects of a TBI will vary, depending on the individual.

Employers can play a vital role in these individuals’ recovery by recognizing the challenges associated with TBI and making adjustments and/or reasonable accommodations to help ensure workplace success.

# Section 2: Disclosure

## What does this section include?

* What is disclosure?
* Disclosure for job applicants and existing employees
* Workplace strategies for employees with a TBI

## What is Disclosure?

## Disclosure is divulging or giving out personal information about a disability.

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While individuals with obvious physical disabilities don't have the option of not disclosing their disability status, people with TBIs may be able to get through the interviewing and hiring process without anyone knowing that they have a disability.

## [Next Slide]

Disability disclosure can occur during any stage of the employment process, including pre-employment, post-offer, and while employed – whether it be within days, months, or years of initially being hired.

## TBI and the Americans with Disabilities Act

The Americans with Disabilities Act (ADA) has a general definition of disability, but does not include a list of medical conditions.

Under the ADA, a person has a disability if he/she has a physical or mental impairment that substantially limits one or more major life activities, a record of such an impairment, or is regarded as having an impairment.

Therefore, some individuals with a TBI will have a disability under the ADA and some will not.[[5]](#footnote-5)

## What is Disclosure?

It is up to the individual with the disability to determine the right time to disclose, given his or her particular circumstances and comfort level.

Ideally, employees will disclose a disability and request accommodations as soon as they need them, or at least before performance problems become too serious.

## [Next Slide]

Disclosure also allows a worker to involve an employment service provider, a job coach, or other third party to assist in learning skills and developing accommodations.

This type of employment support is generally arranged and paid for by state Vocational Rehabilitation agencies.

## Did you know?

## Section 503 of the Rehabilitation Act requires covered federal contractors and sub-contractors to invite applicants to self-identify as an individual with a disability during the pre-offer and post-offer phases of the application process, and to invite employees to self-identify every five years.[[6]](#footnote-6)

## [Next Slide]

The self-identification of disability form is a voluntary form, so each individual may choose to disclose his or her disability status, or not.

Obviously, covered employers have a vested interest in encouraging employees to disclose so that their employment can help the employer meet their 503 requirements.[[7]](#footnote-7)

## [Next Slide]

Disclosure also allows a worker to involve an employment service provider, a job coach, or other third party to assist in learning skills and developing accommodations.

This type of employment support is generally arranged and paid for by state Vocational Rehabilitation or mental health services.

## Did you know?

Section 503 of the Rehabilitation Act requires covered federal contractors and sub-contractors to invite applicants to self-identify as an individual with a disability during the pre-offer and post-offer phases of the application process, and to invite employees to self-identify every five years.[[8]](#footnote-8)

## [Next Slide]

The self-identification of disability form is a voluntary form, so each individual may choose to disclose his or her disability status, or not.

Obviously, covered employers have a vested interest in encouraging employees to disclose so that their employment can help the employer meet their 503 requirements.[[9]](#footnote-9)

## Disclosure for Job Applicants

Applicants with disabilities such as TBI are not required to disclose their disability to an employer.

 Applicants never have to disclose their disability on a job application, or in the job interview, unless they need an accommodation to assist them in the application or interview process.

## [Next Slide]

Applicants with a TBI (or any other disabling condition) do not have to submit to a medical exam, or answer any medical questions until after they have been offered a job.

## Disclosure for Existing Employees

An employee with a TBI need only disclose their disability if/when they need an accommodation to perform the essential functions of the job.

## [Next Slide]

An employer can ask an employee with a TBI for a medical examination if it is job-related or consistent with business necessity.

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A medical examination may be “job-related and consistent with business necessity” if the employee’s ability to perform essential job functions might be impaired or if the employee might pose a direct threat due to a TBI (for example, a heavy equipment operator who has a TBI that affects motor coordination).

## Workplace Strategies

A brain injury is a life-altering event that may affect many areas of an employee’s life.

Cognitive, behavioral, and emotional changes and changes in communication style may occur following a TBI.

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Compensatory strategies can assist individuals with brain injuries in coping with cognitive, behavioral, and/or emotional changes by:

* Building on strengths;
* Working around deficits or problems that result from brain injuries.

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For example, when completing tasks, the individual might do better to focus on one task at a time and complete it in its entirety before moving on to the next task.

## [Next Slide]

Remember: Each individual is unique, so a technique that works well for one person may not work for another.

## [Next Slide—Video]

Interview with Robin Spicuzza, Administrative Assistant, Brain Energy Support Team:

“My previous employer, I was with for five years and then I had the brain injury. I think what they expected was that the TBI to go away and to be totally healed, and that's not what happens. I was let go because I couldn't perform my duties.”

Interview with Gloria Kraegel, Executive Director, Brain Energy Support Team:

“My name's Gloria Kraegel, I'm the Executive Director for the Brain Energy Support Team. I am Robin's supervisor.

I've been working with Robin for about three years. So there are some standard things that we try and do for all of our volunteers and our staff, and that is to create an environment that is neuro-friendly.”

Robin Spicuzza: “It was really refreshing to have somebody that would be willing to work to try to find out what my skill level was, what I still have, and then try to find a direction that I could be successful.”

Gloria Kraegel: “Things that, in terms of Robin specifically, that we've done is identify the fact that her short term memory, that she has challenges with that. So we've put in place, using things like steps cards, which takes a task that she'll be doing repeatedly, and identifying each step.

Robin Spicuzza: “So the different tasks are all put down on the computer in these easy step-by-step instructions, so if my memory doesn't work, so then I can refer to the steps cards.

We did a lot of check-in. ‘So, how is this working for you? Is there anything we can do to accommodate you? What do you feel, what's your comfort level on this?’”

Gloria Kraegel: “Little things like that, that we've put in place for Robin, and then constantly evaluating. Is she feeling successful with the work that she's doing? What changes should we make that better support her ability to be successful? Does she have the tools that she needs to be successful? If she's not successful, we're not successful.”

Robin Spicuzza: “Take the person at face value. If they're willing to disclose, that takes a lot of courage for the person. And so I choose to disclose, and I just think that that's a better way to go about it because the employer knows what they're getting into, the employee can ask for accommodations, feel comfortable about that, and if the employer does hire them, then you know that they're willing to work with you, and it's just a more level playing field to me.”

## [Next Slide]

While developing workplace strategies, an employer may want to consider the following:

* What limitation is the employee with a TBI experiencing and how do these limitations affect the employee’s job performance?
* What specific job tasks are problematic because of these limitations?
* What accommodations are available to reduce or eliminate these problems?
* Has the employee with a TBI been consulted regarding possible accommodations?
* Do supervisors or other employees need training regarding TBI?

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Employers and employees should work together to develop and plan effective strategies to improve their work performance.

* Step 1: Prepare a plan of action
* Step 2: Keep it simple
* Step 3: Maintain open communication

## [Next Slide]

Step 1: Prepare a plan of action

* Define the employee’s responsibilities;
* Work with the employee to determine the best way to talk with coworkers; about the brain injury if the employee chooses to do so;
* Incorporate tools such as calendars and notebooks in the planning process as appropriate.

## [Next Slide]

Step 2: Keep it simple

* Break tasks into small steps;
* Keep the employee’s work environment as free from distractions as possible.

## [Next Slide]

Step 3: Maintain open communication

* Discuss performance and job expectations;
* Evaluate performance and provide thoughtful, realistic comments about behavior;
* Identify successes and address areas of concern directly and immediately.

## End of Section Quiz

Question 1/3

True or False: An individual with a TBI is automatically covered under the ADA.

Answer: False. The medical diagnosis of a TBI does not necessarily qualify as a disability under the ADA.

## [Next Slide]

Question 2/3

True or False: Applicants with disabilities such as TBI are not required to disclose their disability to an employer.

Answer: True. Applicants with disabilities such as TBI are not required to disclose their disability to an employer.

## [Next Slide]

Question 3/3

Multiple Choice (Select One): The following changes may occur following a TBI:

* Cognitive
* Behavioral
* Emotional
* All of the above

Answer: All of the above. Cognitive, behavioral, and emotional changes and changes in communication style may occur following a TBI.

## Section Wrap Up

Some individuals with a TBI will have a disability as defined by the ADA and some will not.

Employees with TBIs need only disclose their disability if/when they need an accommodation to perform the essential functions of the job.

Employers and employees should work together to develop and plan effective strategies to improve their work performance.

# Section 3: Reasonable Accommodations

## What does this section include?

* What is a reasonable accommodation?
* Accommodation examples for individuals with a TBI
* Supportive networks

## What is a Reasonable Accommodation?

A reasonable accommodation is a modification or adjustment to a job, the work environment, or the way things usually are done that enables a qualified individual with a disability to enjoy an equal employment opportunity.

## [Next Slide]

The ADA requires reasonable accommodations in three aspects of employment:

* To ensure equal opportunity in the application process;
* To enable a qualified individual with a disability to perform the essential functions of a job; and
* To enable an employee with a disability to enjoy equal benefits and privileges of employment.[[10]](#footnote-10)

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Accommodations are based on the individual’s specific impairment. It is important for an employee with particular needs related to brain injury to discuss accommodations options with the employer.

## [Next Slide]

Many accommodations are simple and inexpensive. For example, providing a notebook in which the employee can write information to compensate for memory difficulties or cue cards to help an employee remember the steps for a particular process.

## Accommodation Examples for Individuals with a TBI

For Physical Limitations

* Install ramps, handrails, and provide accessible parking spaces;
* Install lever or loop style door handles or automatic door opener;
* Clear pathways of travel of any unnecessary equipment and furniture;
* Provide clear and identifiable signage for way-finding.

## [Next Slide]

For Visual Problems

* Provide written information in large print;
* Change fluorescent lights to high intensity, white lights;
* Increase natural lighting and avoid flicking, flashing, or strobing light effects;
* Provide a glare-resistant screen for computer monitors.

## [Next Slide—Video]

Animation of case study for visual problems:

“Following his TBI, Javier, a tax attorney, experienced difficulties, such as blurred vision and frequent headaches, while reading at work. Following a consultation provided by an Assistive Technology Specialist from a Vocational Rehabilitation agency for people who are blind or have low vision, his employer purchased a video magnifier for Javier to use at his desk. The video magnifier (also known as a Closed Circuit Television System, or CCTV) reduces the strain on Javier's eyes so that he can read legal documents for longer periods of time.”

## [Next Slide]

For Difficulty Maintaining Stamina During the Day

* Permit flexible scheduling, allow longer or more frequent work breaks;
* Provide additional time to learn new responsibilities;
* Increase natural lighting;
* Provide backup coverage for when the employee needs to take breaks;
* Provide for job sharing opportunities;
* Avoid scheduling more challenging tasks at the end of the work shift when fatigue is more likely to be a factor.

## [Next Slide—Video]

Animation of case study for difficulty maintaining stamina during the day:

“Pete, a warehouse worker, experienced a TBI while playing football over the weekend with friends. Several weeks after his injury, Pete's co-workers noticed that he seemed to lose significant amounts of energy toward the end of each day at work. After discussing the issue with Pete, his supervisor suggested that he take more breaks during the day to increase his exposure to natural light. Pete and his supervisor also met with Pete's team to support more flexibility in his scheduling. Brief walks outside now help Pete maintain his stamina. His slumps in energy toward the end of each day are less pronounced.”

## [Next Slide]

For Difficulty Maintaining Concentration

* Reduce distractions in the work area;
* Allow for use of white noise or environmental sound machines;
* Encourage the employee to focus on one task at a time;
* Divide large assignments into smaller tasks and steps;
* Restructure job to include only essential functions.

## [Next Slide]

For Difficulty Staying Organized and Meeting Deadlines

* Encourage the employee to use daily “to-do” lists and check items off as they are completed;
* Provide a special calendar to mark meetings and deadlines;
* Remind employee of important deadlines;
* Divide large assignments into smaller tasks and steps;
* Schedule weekly meetings with supervisor to determine if goals are being met;
* Recognize that emotionality and irritability can be common following some TBIs.

## [Next Slide—Video]

Animation of case study for difficulty staying organized and meeting deadlines:

“Mei-Ling works as an administrative assistant in state government. As a result of a TBI, she has had trouble staying organized in her daily activities. She and her supervisor contacted a Vocational Rehabilitation counselor. The counselor suggested the purchase of a calendar that allows Mei-Ling to plan and organize her daily duties, step by step. A brain rehabilitation therapist also helped Mei-Ling develop cue cards to remind herself of specific actions she can take when she is feeling overwhelmed. These cue cards include things like ‘stop and think,’ ‘take notes with a timeline and completion date,’ ‘ask my supervisor if I need help or have questions,’ ‘double-check my work,’ and ‘slow down.’”

## [Next Slide]

For Memory Deficits

* Allow the employee to record meetings;
* Provide written minutes of each meeting;
* Provide written as well as verbal instructions;
* Limit verbal instructions to shorter, manageable chunks of information;
* Allow additional training time;
* Provide written checklists and use color-coding to help identify items;
* Post instructions close to frequently used equipment.

## [Next Slide]

For Difficulty Handling Stress and Emotions

* Provide praise and positive reinforcement;
* Refer to counseling and employee assistance programs;
* Provide sensitivity training to co-workers;
* Allow frequent breaks as a part of a stress management plan.

## [Next Slide—Video]

Animation of case study for difficulty handling stress and emotions:

“Jonas, an insurance officer manager, experienced difficulty controlling his emotions at work. He had frequent mood swings that range from sad to angry. His extreme changes in mood could sometimes be alarming to his coworkers. While remaining focused on Jonas' successes and hard work, his supervisor encouraged Jonas to talk to his physician or a counselor about his difficulty handling stress and emotions. His employer also designated a quiet area where Jonas can rest when he is feeling stressed or upset at work.”

## Addressing Questions from Coworkers

There is no requirement to inform coworkers about a disability or need for accommodation. While coworkers may be aware that an employee is receiving accommodations, they are not entitled to know why.

Informing ALL employees about the ADA and the right to request accommodations, and encouraging a workplace culture that is inclusive of workers with disabilities, are ways to ward off unnecessary questions related to coworker accommodations.[[11]](#footnote-11)

## Maintaining Confidentiality

The ADA requires employers to keep all disability-related information confidential and in a file separate from the employee’s personnel file.

Employee medical information should only be shared with those who are considered need-to-know.[[12]](#footnote-12)

## Supportive Networks

Unfortunately, the most common reason why individuals with a TBI lose their jobs is that a change in the job occurs that interferes with their performance and upsets them emotionally.

Such changes can range from a new supervisor to a different schedule to relatively minor adjustments in job duties.

## [Next Slide]

In some cases, changes may not seem that large to employers or co-workers who consequently do not understand why the worker with a TBI is suddenly not performing well or is regularly upset at work.

## [Next Slide]

The services of a Vocational Rehabilitation Counselor (VRC) can help identify issues and make recommendations to accommodate the needs of the employer and employee.

## [Next Slide]

In general, VRCs can assist employees with a traumatic brain injury by helping to identify the employee's specific needs and strengths, as well as by providing recommended accommodations and compensation techniques.

 You can reach local VR services through a directory of State Vocational Rehabilitation agencies on this website: <https://www.csavr.org/stateagencydirectory>.

## [Next Slide]

Remember: You don’t have to do this alone.

Recruit and involve a team of support including the individual throughout the planning and accommodation process.

## [Next Slide--Video]

Interview with Gloria Kraegel, Executive Director, Brain Energy Support Team:

“My advice to any employer would be to really listen to what the needs are, and then look at ways to support that individual. I think that when you create, and I know this for ourselves, when we've created an environment that supports an individual's success, and recognizes that the challenges exist, but don't judge them for those challenges, then you get superior performance, you get loyalty, and that employee is going to stay, and not only are they going to stay, but they're going to edify the organization out in public, and what more could any employer want than their employees saying good things about them to the rest of the world?”

## End of Section Quiz

Question 1/3

Multiple Choice (Select One): The ADA requires reasonable accommodations in several aspects of employment…

* To ensure equal opportunity in the application process
* To enable a qualified individual with a disability to perform the essential functions of a job
* To enable an employee with a disability to enjoy equal benefits and privileges of employment
* All of the above

Answer: All of the above. The ADA ensures equal opportunity in 1) the application process, 2) performing the essential duties of a job, and 3) enjoying the benefits and privileges of employment.

## [Next Slide]

Question 2/3

True or False: Accommodations are based on the individual’s specific impairment. It is important for an employee with particular needs related to brain injury to discuss accommodations options with the employer.

Answer: True. Accommodations are based on the individual’s specific impairment.

## [Next Slide]

Question 3/3

Multiple Choice (Select One): What is a common accommodation for an employee that has memory difficulties?

* Adjust work schedule to accommodate fatigue/stamina levels
* Allow the employee to record meetings
* Do not mandate social function attendance

Answer: Allowing an employee to record meetings can assist with memory difficulties as a result of a TBI.

## Section Wrap Up

Accommodations are based on the individual’s specific impairment. It is important for an employee with particular needs related to brain injury to discuss accommodations options with the employer.

The best way to know if an individual with a TBI can do a job is to try it.

The services of a Vocational Rehabilitation Counselor (VRC) can help identify the issues and make recommendations to accommodate the needs of the employer and employee.

# Additional Resources and Sources

## Additional Resources for Supporting Employees with Traumatic Brain Injuries (TBIs)

ADA National Network
<https://adata.org/>

Brain Injury Association of America<https://www.biausa.org/>

Brainline<https://www.brainline.org/>

Craig Hospital Traumatic Brain Injury (TBI) Resources<https://craighospital.org/resources/topics/traumatic-brain-injury>

Job Accommodation Network
<https://askjan.org/>

National Resource Center for Traumatic Brain Injury (NRCTBI)<http://www.tbinrc.com/>

Traumatic Brain Injury.com<http://www.traumaticbraininjury.com/>

Vocational Rehabilitation Agencies<https://www.csavr.org/stateagencydirectory>
<http://www.ncsab.org/List/StateDirectors>

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Taylor, C.A., Bell, J.M., Breiding, M.J., Xu, L. Traumatic Brain Injury-Related Emergency Department Visits, Hospitalizations, and Deaths – United States, 2007 and 2013. MMWR Surveillance Summaries 2017; 66 (9):1–16. Retrieved 8/27/2018 from: <https://www.cdc.gov/mmwr/volumes/66/ss/ss6609a1.htm>

## Thank you for completing this course on Supporting Employees with Traumatic Brain Injuries (TBIs).

The JD-VRTAC is a national center housed at the Institute for Community Inclusion (ICI) at the University of Massachusetts Boston. The center and its materials are funded by the Rehabilitation Services Administration (RSA) within the US Department of Education under grant #H264A140002.

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1. https://www.cdc.gov/traumaticbraininjury/index.html [↑](#footnote-ref-1)
2. https://www.cdc.gov/mmwr/volumes/66/ss/ss6609a1.htm [↑](#footnote-ref-2)
3. https://www.brainline.org/article/your-brain-work-recovering-brain-injury [↑](#footnote-ref-3)
4. https://www.brainline.org/article/traumatic-brain-injury-basics [↑](#footnote-ref-4)
5. EEOC Regulations 2011 [↑](#footnote-ref-5)
6. https://www.dol.gov/ofccp/regs/compliance/faqs/503\_faq.htm#Q10 [↑](#footnote-ref-6)
7. ttps://www.dol.gov/ofccp/regs/compliance/faqs/503\_faq.htm#Q10 [↑](#footnote-ref-7)
8. https://www.dol.gov/ofccp/regs/compliance/faqs/503\_faq.htm#Q10 [↑](#footnote-ref-8)
9. https://www.dol.gov/ofccp/regs/compliance/faqs/503\_faq.htm#Q10 [↑](#footnote-ref-9)
10. https://www.eeoc.gov/facts/ada17.html [↑](#footnote-ref-10)
11. Effective Accommodation Practices (EAP) Series: Disability Disclosure and Employment. Job Accommodation Network, Morgantown WV [↑](#footnote-ref-11)
12. Effective Accommodation Practices (EAP) Series: Disability Disclosure and Employment. Job Accommodation Network, Morgantown WV [↑](#footnote-ref-12)