

## **LACTATION ACCOMMODATION POLICY**

The John A. Hartford Foundation provides accommodations to employees who pump during work hours. This includes the following lactation accommodation policy administered by the Foundation.

In accordance with the New York City Human Rights Law, the John A. Hartford Foundation provides reasonable accommodations for employees' pregnancy, childbirth, or related medical conditions, including accommodations for lactation. Before an employee returns from parental leave, the John A. Hartford Foundation will seek to discuss with the employee whether the employee needs a reasonable accommodation to express breast milk at work.

The John A. Hartford Foundation will not tolerate discrimination or harassment against any employee based on the request for or usage of lactation accommodations. Any discrimination, harassment, or other violations of this policy can be reported to the HR Department/myHR Partner.

### **Use of Lactation Room**

- The John A. Hartford Foundation's dedicated lactation room is located at the powder room next to the kitchen.
- The lactation room: is clean; is free from intrusion and shielded from view of others; contains at least one electrical outlet, a surface to place a pump and other personal items, and a chair; is near running water (i.e., for washing hands and/or cleaning breast pump parts); is near refrigeration, and can be locked from the inside.
- When more than one employee needs to use the designated lactation room, the John A. Hartford Foundation will discuss various options with all employees who use the lactation room to determine what arrangement addresses each employee's needs such that each employee has access to the lactation room amenities. Options may include: finding an alternative clean space free from intrusion; sharing the space among multiple users; or creating a schedule for use. Any accommodation will ensure each employee is afforded a reasonable amount of time to pump.
- Even if the lactation room is available, an employee who wishes to pump at their usual workspace will be permitted to do this so long as it does not create an undue hardship for the John A. Hartford Foundation.
- A refrigerator in the kitchen is available for employees to store breast milk.

### **Reasonable Time to Express Breast Milk**

- The John A. Hartford Foundation will provide a reasonable amount of time for an employee to express breast milk and will not unreasonably limit the amount of time or the frequency that an employee expresses breast milk.
- The John A. Hartford Foundation does not require the employee to work while pumping.

## Lactation Accommodation Request Process

- Before an employee returns from parental leave, the John A. Hartford Foundation will send this policy to the employee in writing (electronically) and request information from the employee regarding the need for a reasonable accommodation to express breast milk at work.
- Employees may also independently request a lactation accommodation by contacting their direct supervisor. A request may be made orally or in writing to their direct supervisor and should indicate that the employee will need accommodations for expressing breast milk at work.
- Their direct supervisor will respond to a request for a lactation accommodation as quickly as possible, and no later than five (5) business days from the date of the request.
- The John A. Hartford Foundation recognizes that employees' lactation accommodation needs may change over time. Employees may request changes to their existing lactation accommodation at any point.

## Undue Hardship

- If the John A. Hartford Foundation believes that the lactation accommodation requested poses an undue hardship on the John A. Hartford Foundation, the John A. Hartford Foundation will discuss reasonable alternatives with the employee to accommodate the employee's needs, initiating a cooperative dialogue as quickly as possible, but absolutely no later than five (5) business days from the date of the request. The conversation between the John A. Hartford Foundation and the employee will be in good faith, may occur orally or in writing, and will conclude with a final written determination of the accommodation granted or denied. This process gives the employee an opportunity to have an open discussion with the John A. Hartford Foundation about their needs, and the John A. Hartford Foundation has an opportunity to hear its employee and work with them to come up with an appropriate accommodation for the employee.
- During the time it takes to respond to a request and/or engage in a cooperative dialogue to determine the accommodation, the John A. Hartford Foundation will provide a temporary accommodation to the employee so that the employee can pump in a manner that meets the employee's immediate needs unless doing so poses an undue hardship.