ACCOMMODATIONS POLICY

Office of Equal Opportunity

**Purpose:** To establish uniform guidelines in order to promote a work and educational environment at Tufts University free of discrimination and harassment for people with disabilities and to ensure university compliance with federal and state laws pertaining to qualified individuals with disabilities.

**Revised:** September 2022

**Applicability:** This policy applies to faculty, staff, students, applicants for employment and admissions, patients, visitors to campus, and community members.
**POLICY STATEMENT**

Tufts University is committed to providing reasonable accommodations for qualified individuals with disabilities in a fair and equitable manner and in accordance with applicable federal and state laws. We seek to promote a diverse and inclusive University community and the Tufts Office of Equal Opportunity (OEO) urges everyone in the Tufts community to take part in fulfilling this commitment. This is the main Accommodation policy designed to support people with disabilities in our environment. There is a different policy, the Religious Accommodation Policy which focuses on religious requests for accommodation.

**DEFINITIONS**

**ADA:** Americans with Disabilities Act

**Disability:** According to the Americans with Disabilities Act (ADA), a disability is defined as a physical or mental impairment that substantially limits one or more major life activities (for example, walking, standing, or breathing). The term "disability" may include learning, sensory, psychological, physical, medical and even certain temporary disabilities. The University provides people with disabilities individualized and reasonable accommodations to gain equal access to campus programs, work environments, information technology and other resources. Most undergraduate classroom and academic requests for accommodation are referred to the Student Accessibility and Academic Resource Center (StARR Center) and are not handled in OEO.

**Qualified Persons with Disabilities:** An employee or applicant with a disability who satisfies the skill, experience, education, and other job-related requirements for the position and who can perform the essential functions of the job in question with or without reasonable accommodations. This includes part-time, full-time, probationary, non-career status, and temporary employees. Similarly for students, a qualified person with a disability is a student who satisfies all the skill, experience, and educational requirements for their chosen educational program with or without reasonable accommodations.

**Essential Functions:** Job duties typically, but not exclusively, found on a job description, considered so fundamental that the individual cannot do the job without performing them. Similarly, for students, essential functions are defined as basic activities and responsibilities that a student must be able to perform to complete their academic program and/or be considered for program admission, retention, and graduation. Essential functions for both students and staff must be met either without an accommodation or with appropriate accommodation(s) after meeting the qualifications for a disability.

**Interactive Process:** The interactive process is the procedure through which an employer and an individual with a documented disability work together to identify what barriers exist to the individual's performance and/or essential functions of a particular job with the intention of finding a reasonable accommodation. The interactive process often includes a review of the individual's abilities and limitations along with an analysis of which factors or job tasks may pose a difficulty and how the person may be accommodated. Similarly with students, the interactive
process is when the OEO or a school administrator (usually the school student services dean or members of the StAAR Center) works with the student to identify existing barriers preventing the student from the equal access of a student’s basic activities and responsibilities in their academic program with the intention of finding an accommodation that is reasonable.

For a visual flowchart of the Accommodation processes, please see flowcharts below. The Interactive Process is also described in greater detail in Section VI.

**Reasonable Accommodation:** The Americans with Disabilities Act (ADA) and Section 504 of the Rehabilitation Act, require Tufts University to provide appropriate and reasonable academic and employment accommodations to employees and students with disabilities unless doing so would create an undue hardship, compromise the health and safety of members of the University community, or fundamentally alter the nature of the University’s employment or academic mission. The University engages in an interactive process with the student or employee to determine disability status and accommodation needs.

**Undue Hardship:** An action requiring significant difficulty, expense, and disruption (financial and/or administrative burden) or an action that would fundamentally alter policy and procedures, the nature of the job function, and/or the fundamental nature of the academic program at Tufts University.

**Accommodations Team:** The OEO Accommodations team is responsible for the interactive process for University employees and are a designee for certain student issues involving accessibility and other ADA process issues for the University. The Accommodations Team also works closely with managers, supervisors, faculty affairs offices, Human Resources and Leave Administration personnel to arrive at reasonable accommodations for qualified people with disabilities at Tufts. The Accommodations Team includes Katherine Vosker, Accommodations Manager and 504 Officer, and Amin Fahimi Moghadam, Accommodations Specialist.

**PROCESSES AND PROCEDURES**

**Student Academic Accommodations**

**Medford Campus**
Undergraduate and graduate students enrolled in the School of Arts, Sciences & Engineering, The Fletcher School, SMFA, or the Boston School of Occupational Therapy, who need an academic accommodation, should work with the Student Accessibility and Academic Resources (StAAR) Center, [http://students.tufts.edu/student-accessibility-services](http://students.tufts.edu/student-accessibility-services) or contact Kirsten Behling, the Associate Dean of Student Accessibility and Academic Resources Services at 617.627.4539 or accessibility@tufts.edu

**Note:** If you are a faculty member who has received an accommodation request from a student, you should refer the student to the Student Accessibility and Academic Resources (StAAR) Center at the contact number listed above and contact StAAR to notify them of the student referral.
**Boston & Grafton Campuses**

Graduate and Professional students at any Tufts school located on these campuses who need an academic accommodation should contact the appropriate school administrator listed on the following page.

**Note:** If you are a faculty member who has received an accommodation request from a professional student, you are obligated to:

- Refer the student to the appropriate school administrator or to the Office of Equal Opportunity’s (OEO) Accommodations Team listed in the contacts table
- Contact the school administrator or OEO’s Accommodation team about the student referral.

**Non-Academic Student Accommodations**

**Medford Campus**

**Housing** – For all requests related to accessible housing, please contact the Office of Residential Life at 617.627.3248 or visit: [http://ase.tufts.edu/reslife/policies/medical.asp](http://ase.tufts.edu/reslife/policies/medical.asp).

**Transportation** – For information regarding accessible parking and/or Tufts accessible shuttle service on the Medford Campus, please contact the Department of Public Safety Parking and Administrative Services at 617.627.3692 or visit: [http://publicsafety.tufts.edu/adminsvc/](http://publicsafety.tufts.edu/adminsvc/).

**Student Food Allergies** – For all requests regarding food allergies, please contact Dining Services at 617.627.3566 or visit: [http://dining.tufts.edu/](http://dining.tufts.edu/).

**Student Health Accommodations (including medical leaves)** – For information regarding classroom, academic, medical leaves or other accommodations, please contact the Office of Student Affairs at 617.627.3158 or visit: [http://uss.tufts.edu/studentaffairs/healthandsafety/healthaccommodations.asp](http://uss.tufts.edu/studentaffairs/healthandsafety/healthaccommodations.asp).

**Boston & Grafton Campus**

For all accommodations on the Tufts University Boston and Grafton campuses, please contact the appropriate school administrator in the table listed below or the Office of Equal Opportunity Accommodations Team.

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<tr>
<th>SCHOOL</th>
<th>CONTACT</th>
<th>TITLE</th>
<th>CONTACT INFORMATION</th>
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</thead>
<tbody>
<tr>
<td>Cummings School of Veterinary Medicine</td>
<td>Chad Argotsinger</td>
<td>Assistant Dean of Student Affairs</td>
<td><a href="mailto:Chad.Argotsinger@tufts.edu">Chad.Argotsinger@tufts.edu</a></td>
</tr>
<tr>
<td>Friedman School of Nutrition Science and Policy</td>
<td>Matthew Hast</td>
<td>Assistant Dean of Student Affairs</td>
<td>617.636.6719 <a href="mailto:Matthew.Hast@tufts.edu">Matthew.Hast@tufts.edu</a></td>
</tr>
<tr>
<td>Graduate School of Biomedical Sciences</td>
<td>Daniel Volchok</td>
<td>Associate Dean</td>
<td>617. 636.2975 <a href="mailto:Daniel.Volchok@tufts.edu">Daniel.Volchok@tufts.edu</a></td>
</tr>
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Accommodations for Employees (Faculty and Staff)

When seeking a reasonable accommodation, employees are encouraged to inform their manager/department chair of the need for an accommodation. Upon receiving an accommodation request, managers/department chairs should refer the request to OEO. OEO will engage the employee in an interactive dialogue to clarify the type of accommodation(s) and the reasonableness of the accommodation(s) being sought.

Before any accommodation(s) is/are made, managers/department chairs should contact OEO for their assistance in determining:

- whether the employee qualifies as an individual with a disability;
- what the essential functions of the employee’s job are (OEO may request the job description to assess essential job functions);
- the reasonableness of the accommodation being sought in conjunction with a manager or department chair and/or alternative accommodation(s).

As part of the interactive process, OEO may ask the employee to provide timely medical and/or other documentation from the appropriate provider to support their request for the reasonable accommodation. All medical documents will be handled confidentially at OEO.

After timely submission of all required documentation, OEO will confer with the employee and the employee’s manager/department chair and may also confer with Human Resources Business Partners (HRBP) to discuss the requested accommodation(s) and, if necessary, possible alternatives. After making a final determination on the accommodation matter based on facts gathered and received, OEO will communicate its decision to the employee, the employee’s manager/department chair, and appropriate HR personnel.

Sometimes an employee needs to take a medical leave. For additional information about medical leaves, please contact leave administration at leaves@tufts.edu. An employee who believes they

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<tr>
<th><strong>Public Health and Professional Degree Programs and Physical Therapy Programs</strong></th>
<th><strong>Olivia Zimra-Turley</strong></th>
<th><strong>Associate Director of Student Affairs</strong></th>
<th><strong><a href="mailto:Olivia.Zimra_Turley@tufts.edu">Olivia.Zimra_Turley@tufts.edu</a></strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>School of Dental Medicine</strong></td>
<td>Maggie McMorrow</td>
<td>Associate Director of Student Affairs and Career Services</td>
<td>617.636.6543 <a href="mailto:maggie.mcmorrow@tufts.edu">maggie.mcmorrow@tufts.edu</a></td>
</tr>
<tr>
<td><strong>School of Medicine</strong></td>
<td>John Matias</td>
<td>Associate Dean of Admissions and Enrollment</td>
<td>617.636.6568 <a href="mailto:John.Matias@tufts.edu">John.Matias@tufts.edu</a></td>
</tr>
<tr>
<td><strong>University-wide</strong></td>
<td>Katherine Vosker</td>
<td>Accommodations Manager and 504 Officer</td>
<td>617.627.0657 <a href="mailto:Katherine.Vosker@tufts.edu">Katherine.Vosker@tufts.edu</a></td>
</tr>
<tr>
<td><strong>University-wide</strong></td>
<td>Amin Fahimi Moghadam</td>
<td>Accommodations Specialist</td>
<td>617.627.6363 <a href="mailto:Amin.Fahimi_Moghadam@tufts.edu">Amin.Fahimi_Moghadam@tufts.edu</a></td>
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may require an accommodation upon return to work, must contact their supervisor of the OEO Accommodations Team at least three weeks before your expected return to work so there is time for the interactive process.

**Accommodations for Job Applicants**

Applicants for employment at Tufts should inform the hiring manager or the department of the need for any reasonable accommodation(s). Upon receiving an accommodation request, hiring managers and/or Human Resources designees should do one of the following:

- engage the job applicant in an interactive process to determine whether the individual qualifies as an individual with a disability and, if so, determine what reasonable accommodation(s) can be offered;
- engage the job applicant in an interactive process to determine if the individual qualifies as an individual with a disability who can perform the essential functions of the job with or without a reasonable accommodation(s); or
- contact the OEO Accommodation Manager for assistance.

As part of the interactive process, the OEO or the involved HR representative may ask the applicant to provide medical and other forms of documentation to support his/her request. All medical documents will be handled confidentially at OEO/HR.

Once the required documentation has been submitted, the OEO and/or HR will discuss the requested accommodation(s) with the applicant, and, if necessary, suggest possible alternatives.

After making a final determination on the matter, the OEO and/or HR will communicate the decision to the applicant. The Human Resources department is responsible for implementing all approved accommodations during the interview process. Similarly, each School’s Admissions Offices are responsible for implementing all approved accommodations during the admissions’ processes.

**Appeals Process**

Students, employees, and applicants who disagree with the outcome of their request for an accommodation(s) may address their concerns with Katherine Vosker, 504 Officer at Katherine.vosker@tufts.edu, or Jill Zellmer, the Executive Director of OEO at jill.zellmer@tufts.edu.

**Rights and Responsibilities of Tufts Employees**

**Duty to Cooperate**

Managers, supervisors, faculty and other agents of the University have a duty to refer accommodation requests from students, employees, applicants, and community members to OEO for the initiation of the interactive process. If you have any questions regarding where or
how to refer a reasonable accommodation request, please contact the OEO Accommodations team at 617.627.3298 or at oeo.tufts.edu.

Any agent of the University who fails to refer an accommodation request may be subject to disciplinary action.

**Freedom from Retaliation**
Any University community member who believes they are a person with a disability has the right to request a reasonable accommodation(s) without fear of retaliation. It is a violation of the University policy to retaliate against an individual for requesting an accommodation. Any person who retaliates against an individual who self-identifies as a person with a disability at Tufts University is subject to disciplinary action.

**Confidentiality**
In accordance with the ADA, Tufts will protect and maintain the privacy and confidentiality of any medical information of its applicants, employees, students, and community members obtained in connection with the reasonable accommodation process. All medical information will be kept as confidential as possible and maintained securely and separate from personnel files in OEO.

**REPORTING RESOURCES**

**Helpful Resources for Tufts Community Members and Visitors**

**Reporting Access Issues:**
To report an issue concerning access to Tufts' buildings and grounds, including access issues involving snow removal, curb cuts, and non-operable automatic door openers on the Medford, Boston, or Grafton campuses, please contact the Facilities Department:

Medford Campus: 617.627.3692
Boston Campus: 617.636.0392
Grafton Campus: 508.887.4392

**Accessible Parking:**
For information regarding accessible parking on the Medford, Boston, and Grafton campuses, please contact the Department of Public Safety:

Medford Campus: 617.627.3030
Boston Campus: 617.636.6610
Grafton Campus: 508.839.5303

**Accessible Maps:**
The accessibility maps can be found on the [website](#).
Commencement Resources: http://commencement.tufts.edu/
AS&E Conference Bureau: http://ase.tufts.edu/conferences/
FREQUENTLY ASKED QUESTIONS

Who are the University’s ADA Accommodation Team and who is the Section 504 Officer and what role do they play at Tufts?
Section 504 protects all qualified individuals with impairments who are involved in programs and activities that receive federal funding assistance from the US Department of Education. The Accommodations team, Katherine Vosker and Amin Fahimi Moghadam, are in charge of the Accommodations processes at Tufts.

The 504 Officer is responsible for ensuring University compliance with ADA, Section 504 and its regulations. The 504 Officer is Katherine Vosker. Concerned community members can also contact the Executive Director of OEO, Jill Zellmer, at 617.627.3298 or Jill.Zellmer@tufts.edu.

How is the interactive process facilitated at Tufts?
The interactive process is initiated when an employee, student, and/or Tufts community member requests a reasonable accommodation (see guidelines below for specific details regarding how requests should be submitted). The individual with a documented disability will work together with OEO, HR, or their academic leader to identify what accommodations may be reasonably implemented to eliminate barriers to equal access of employment for applicants and staff or to educational programs for students and community members. The interactive process analysis often includes a review of the individual’s abilities, limitations, and which academic requirements or job tasks pose difficulty for the person with the disability. Fundamental to the process is ensuring that the individual provides timely and sufficient medical documentation to enable the University to determine if the disability substantially limits a major life activity, and if so, what accommodation(s) may be reasonable and still permit the individual to meet the essential functions of the position or academic program. Please see the interactive process flowchart in this document for a visual interpretation of this process.

How are reasonable accommodations made?
Accommodations are provided through an interactive process among the applicant/employee/student/community member and Tufts representatives. The individual requesting the accommodation may be asked to obtain documentation from their appropriate health care provider. Supporting documentation from an appropriate treatment provider may include:

- a diagnosis of the impairment and any accompanying test results;
- a connection between the nature of the disability and the requested accommodation;
- a detailed description of the specific impairment, functional limitations (with and without the use of mitigating measures such as treatment, aids, and medication), functional need, and the medical justification for such need; and
- a recommendation for the type and duration of the accommodation needed, as well as the rationale underlying the request “reasonableness.”
Upon receiving and reviewing the appropriate documentation, a determination will be made by OEO (in the case of an employment request) or by the StARR Center or professional or graduate school designee (in the case of a student classroom or clinical accommodation) regarding the individual's disability. In addition, a determination will be made by appropriate school administrators about the disabled person's essential job functions and/or academic program requirements as they relate to the accommodation being requested. If you have any questions or concerns about this process, please contact the Accommodation Manager, Katherine Vosker, at 617.627.0657 or Katherine.Vosker@tufts.edu, or Accommodations Specialist, Amin Fahimi Moghadam, at 617.627.6363 or Amin.Fahimi_Moghadam@tufts.edu.

What should I do if I feel I have been discriminated against or harassed because of my identified disability?
Students, staff, faculty and community members may report any alleged acts of discrimination or harassment based on disability by contacting Katherine Vosker, Amin Fahimi Moghadam, Jill Zellmer, or filing a complaint on Ethicspoint, OEO's anonymous reporting portal. For further information on reporting incidents or filing an OEO complaint, visit www.oeo.tufts.edu.

Where do I go if I have questions about this policy?
The Tufts University OEO is responsible for enforcing the University’s ADA policy. Please contact OEO if you have any questions about the policy.