

DISABILITY-RELATED REASONABLE ACCOMMODATION 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.

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

Policy Owner: Katherine Vosker, Accommodation Manager, OEO

Revised: September 2024

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. Tufts also has Pregnancy Policies for [Employees](#) and [Students](#). Please refer to the [Non-Discrimination Policy](#) if you have broader questions about discrimination, harassment, sexual misconduct and related retaliation.

DEFINITIONS

ADA: Americans with Disabilities Act.

Disability: According to the 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. Tufts provides people with disabilities individualized and reasonable accommodations to gain equal access to campus programs, work environments, information technology and other resources.

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 a designated school student services officer for the professional schools or members of the StAAR Center for undergraduate and graduate students on the Medford and SMFA campus) 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.

Visual flowcharts of the Accommodation processes for employees and students can be found on our website at: <https://o eo.tufts.edu/resources/printable-resources/>

The Interactive Process is also described in greater detail in Section VI.

Reasonable Accommodation: The 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 Tufts community, or fundamentally alter the nature of the University's employment or academic mission. Tufts will engage in an interactive process with the student or employee to determine disability status and accommodation needs. Please note that accommodations cannot be done retroactively.

Undue Hardship: An action requiring significant difficulty, expense, and disruption (financial and/or administrative burden) and 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.

Accommodations Team: The OEO Accommodations Team is responsible for the interactive process for Tufts employees and is a designee for certain student matters involving accessibility and other ADA process issues for the University. The Accommodations Team works closely with managers, supervisors, faculty affairs offices, Human Resources and Leave Administration personnel and designated student services administrators to arrive at reasonable accommodations for qualified people with disabilities at Tufts. The Accommodations Team includes Katherine Vosker, Accommodations Manager and 504 Officer, Amin Fahimi Moghadam, Accommodations Specialist, and Johny Lainé, Senior Accommodations and Leave Specialist. The Accommodations Team email is Accommodations.OEO@tufts.edu.

PROCESSES AND PROCEDURES

Student Academic Accommodations

Medford and SMFA Campuses

Undergraduate and graduate students enrolled in the School of Arts, Sciences & Engineering, the Fletcher School, or the SMFA, who need an academic accommodation should work with

the Student Accessibility and Academic Resources (StAAR) Center,
<https://students.tufts.edu/staar-center> or 617.627.4539 or staarcenter@tufts.edu.

Note: If you are a Medford or SMFA faculty member who has received an accommodation request from a student, you should refer the student to the StAAR Center at the contact number listed above or contact StAAR to notify them of the student referral.

Boston & Grafton Campuses

For academic and/or clinical accommodations on the Boston and Grafton campuses, graduate and professional students should contact the appropriate school administrator in the table below or the OEO Accommodations Team.

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 OEO Accommodations Team members listed in the contact table.
- Contact the school administrator or the OEO's Accommodation Team about the student referral.

SCHOOL	CONTACT	TITLE	CONTACT INFORMATION
Cummings School of Veterinary Medicine	Angela Jasper McManus	Accommodations Administrator	Angela.Jasper_McManus@tufts.edu
Friedman School of Nutrition Science and Policy	Matthew Hast	Assistant Dean of Student Affairs	617.636.6719 Matthew.Hast@tufts.edu
Graduate School of Biomedical Sciences	Michael Chin	Dean ad interim	617.636.2143 Michael.Chin614279@tufts.edu
Public Health and Professional Degree Programs and Physical Therapy Programs	Office of Graduate Student Services		tusmgpstudentservices@tufts.edu
School of Dental Medicine	Maggie McMorrow	Associate Director of Student Affairs and Career Services	617.636.6543 maggie.mcmorrow@tufts.edu
School of Medicine	John Matias	Associate Dean of Admissions and Enrollment	617.636.6568 John.Matias@tufts.edu
University-wide	Katherine Vosker	Accommodations Manager and 504 Officer	617.627.0657 Katherine.Vosker@tufts.edu
University-wide	Amin Fahimi Moghadam	Accommodations Specialist	617.627.6363 Amin.Fahimi_Moghadam@tufts.edu

University-wide	Johny Lainé	Senior Accommodations and Leave Specialist	617-627-0649 Johny.Laine@tufts.edu
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Non-Academic Student Accommodations

Medford Campus

Housing and Transportation – For all requests related to accessible housing or transportation please contact the StAAR Center at 617.627.4539 or staarcenter@tufts.edu.

Student Food Allergies – For all requests regarding food allergies or intolerances, please contact Dining Services at 617.627.3566 or visit: <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 Life at 617.627.3158 or visit: <http://uss.tufts.edu/studentaffairs/healthandsafety/healthaccommodations.asp>.

Accommodations for Employees (Faculty and Staff) or Visitors to Campus

When seeking a reasonable accommodation, employees are encouraged to inform their manager/department chair or OEO of the need for a reasonable accommodation. Upon receiving an accommodation request, managers/department chairs must refer the request to the 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 reasonable accommodation(s) decision(s) is/are made, OEO will work with the managers/department chairs and employees 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 reasonable accommodation request

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 may need to take a medical leave. For information about medical leaves, please contact Leave Administration at leaves@tufts.edu. An employee who believes they may require an accommodation upon return to work, must contact their supervisor or the OEO Accommodations Team at **least three weeks** before their expected return to work so there is time for the interactive process and assessment.

Visitors to campus who may need a reasonable accommodation to access campus based on a disability or other accommodation (i.e. religion or a pregnancy or related condition) may also contact the OEO to request an accommodation in advance of their need or visit to campus.

Accommodations for Job Applicants

Applicants for employment at Tufts should inform the Human Resources Talent Acquisition Team of the need for any reasonable accommodation(s) in order to participate in the hiring process. Upon receiving an accommodation request, Human Resources must contact the OEO Accommodation Team for assistance. OEO will work with the applicant in an interactive process and request verification of the reasonable accommodation request in order for the applicant to engage equitably in the hiring process.

Once the OEO has the required documentation from the applicant, the OEO will discuss the requested reasonable accommodation(s) with the applicant, and, if necessary, suggest possible alternatives.

After making a final determination on the matter, the OEO will communicate the decision to the applicant and will inform Human Resources of the approved reasonable accommodation. 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) or who feel they have been denied an accommodation may address their concerns with Katherine Vosker, Accommodations Manager and 504 Officer, Katherine.Vosker@tufts.edu, 617.627.0657 or Jill Zellmer, the Executive Director and Title IX Coordinator of OEO at Jill.Zellmer@tufts.edu, 617.627.3298.

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 in a timely way. 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 Accommodations.OEO@tufts.edu

Any agent of the University who fails to refer an accommodation request to OEO in a timely way may be subject to disciplinary action.

Freedom from Retaliation

Any Tufts 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 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 up to and including termination.

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 in OEO and maintained securely and separate from personnel files.

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, elevator issues and non-operable automatic door openers on the Medford, Boston, SMFA or Grafton campuses, please contact the Facilities Department:

Medford Campus: 617.627.3496

(for after-hours emergencies please call the Tufts University Police Department at 617.627.3030)

Boston Campus: 617.636.3535

(for after-hours emergencies please call the Tufts University Police Department at 617.636.6610)

Grafton Campus: 508.887.4949

(for after-hours emergencies please call the Tufts University Police Department at 508.887.4900)

SMFA Campus: 617.363.3535

(for after-hours emergencies please call the Tufts University Police Department at 617.627.6911)

You may also submit an online request at <https://access.tufts.edu/facilities-service-requests>.

Accessible Parking:

Information regarding accessible parking on the Medford, Boston, and Grafton campuses, can be found at <https://access.tufts.edu/parking-transportation>. Individuals can also contact the Parking Offices/Department of Auxiliary Services on the Medford and Grafton Campus or the Parking Office on the Boston Campus:

Medford Campus: 617.627.3692

Boston Campus: 617.636.5580

Grafton Campus: 508.887.4539

Accessible Maps:

Campus accessibility maps can be found on [AccessTufts Accessibility Resources \(https://access.tufts.edu/accessibility-resources-by-campus\)](https://access.tufts.edu/accessibility-resources-by-campus) or OEO's [Campus Maps and Parking \(https://oio.tufts.edu/accommodations/accessibility/campus-maps/\)](https://oio.tufts.edu/accommodations/accessibility/campus-maps/).

Commencement Resources: <http://commencement.tufts.edu/>

AS&E Conference and Events Services: <http://ase.tufts.edu/conferences/>

FREQUENTLY ASKED QUESTIONS

Who are the University's ADA Accommodation Team, 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 OEO Accommodations Team members are Katherine Vosker, Amin Fahimi Moghadam and Johny Lainé.

The 504 Officer is responsible for ensuring the University's compliance with the ADA, Section 504 and its regulations. The 504 Officer is Katherine Vosker, Katherine.Vosker@tufts.edu. Concerned community members can also contact the Executive Director and Title IX Coordinator 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, supervisors or their designated student services administrator 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 Tufts 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 [flowcharts](#) 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:

- an explanation of the impairment and how it may impact the requestor's ability to engage in the work, community and/or the academic environment at Tufts;
- a connection between the nature of the disability and the requested reasonable accommodation;
- a detailed description of how the specific impairment impacts functional limitations (with and without the use of mitigating measures such as treatment, aids, and medication), functional need and/or 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's "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 academic program requirements as they relate to the accommodation being requested. Accommodations cannot be made retroactively.

If you have any questions or concerns about this process, please contact the Accommodation Team at Accommodations.oeo@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 must immediately report any alleged acts of discrimination or harassment or related retaliation based on disability by contacting Katherine Vosker, Amin Fahimi Moghadam, Johny Lainé, Jill Zellmer, or filing a complaint on [Ethicspoint](https://tuftsuniversity.ethicspointvp.com/custom/tuftsuniversity/oeo/form_data.asp) (https://tuftsuniversity.ethicspointvp.com/custom/tuftsuniversity/oeo/form_data.asp), 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 at 617.627.3298 or at Accommodations.oeo@tufts.edu.