

# Second Circuit Adopts Broad Reading of ADA Protections in Recent Workplace Accommodations Case

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In a decision issued on March 25, 2025, the Second Circuit Court of Appeals clarified the scope of protections under the Americans with Disabilities Act (ADA) regarding workplace accommodations.

The court's ruling in [\*Tudor v. Whitehall Central School District\*](#) establishes that employees with disabilities may be entitled to reasonable accommodations, even if they can perform the essential functions of their jobs without them.

## Quick Hits

- In a decision on March 25, 2025, the Second Circuit Court of Appeals ruled that employees with disabilities may be entitled to reasonable accommodations under the ADA even if they can perform their jobs' essential functions without them.
- The case involved a high school teacher with PTSD who was denied brief afternoon breaks, leading the Second Circuit to emphasize the ADA's broader support for employee well-being and inclusion.
- The Second Circuit's ruling clarifies that under the ADA, a "qualified individual" may be entitled to reasonable accommodations to enhance his or her workplace experience, aligning with similar decisions from other circuits and addressing previous uncertainties about the necessity of accommodations for job performance.

The case involved Angel Tudor, a New York high school teacher diagnosed with post-traumatic stress disorder (PTSD), who requested the accommodation of brief afternoon breaks to manage her condition. Tudor had a history of requesting accommodations at work in the years preceding her lawsuit. The school district denied her request during the 2019–2020 school year, prompting her to file a lawsuit alleging a failure to accommodate under the ADA. The lower court dismissed her claim, concluding that during discovery, Tudor acknowledged that she could perform her job's essential functions without the requested breaks, albeit "under great duress and harm." However, the Second Circuit overturned this decision, emphasizing that the ADA requires reasonable accommodations to

support employees' well-being and workplace inclusion, not just those necessary for job performance.

The Second Circuit emphasized the fact that, under the ADA, a “qualified individual” is “an individual who, *with or without reasonable accommodation*, can perform the essential functions of the employment position that such individual holds or desires.” (Emphasis in original.) In other words, whether an employee *can* perform her job responsibilities without a reasonable accommodation does not mean that she *must*. An employee may be a “qualified individual” entitled to reasonable accommodation under the ADA even if she can perform the essential functions of her job without one.

This ruling aligns with similar decisions from other circuits, underscoring that employers must consider reasonable accommodations even when an employee can technically fulfill his or her job duties without them. The *Tudor* decision addresses previous uncertainties about whether an accommodation must be essential for job performance, affirming that the ADA’s protections extend to accommodations that enhance an employee’s overall workplace experience.

In light of the opinion, and similar opinions from at least six other circuit courts of appeal, employers may want to reassess their accommodation policies to ensure they comply with the ADA’s broad protections.

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National Law Review, Volume XV, Number 95

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