

Religious Accommodation Response Guide

A practical process for receiving, evaluating, documenting, and responding to employee requests

PURPOSE OF THIS GUIDE

This member guide helps Christian employers respond consistently and lawfully when an applicant or employee requests a workplace adjustment for a religious belief, practice, or observance. It is designed for owners, executives, human resources leaders, and managers who may receive or evaluate a request.

The central rule is straightforward: covered employers must provide a reasonable religious accommodation unless the accommodation would impose an undue hardship under the standard clarified by the U.S. Supreme Court in *Groff v. DeJoy*. The result depends on the particular facts, the employer's operations, and the alternatives considered.

Table of Contents

1. The legal framework	3	9. Decision and implementation	9
2. The first response	4	10. Documentation and confidentiality	10
3. Understanding the request	4	11. Escalation and counsel review	11
4. Evaluating sincerity	5	12. Manager scripts and practical tools	11
5. Exploring reasonable accommodations	6	13. Sample forms and letters	12
6. Applying the Groff undue hardship standard	7	14. Annual readiness review	14
7. Special issues for Christian employers	8	15. Legal sources and disclaimer	15
8. Common request categories	9		

CORE PRINCIPLES

Recognize the request

An employee need only give enough information for the employer to understand that a work requirement may conflict with a religious belief, practice, or observance.

Confer promptly

Discuss the conflict and possible solutions with the employee. A timely, good-faith exchange is usually essential to finding a workable accommodation and building a reliable record.

Evaluate facts, not theology

Religious beliefs need not be traditional, familiar, logical to the decision-maker, or shared by the organization. Focus on whether the belief is religious in nature, sincerely held, and connected to the workplace conflict.

Use the correct hardship standard

After *Groff*, undue hardship means a burden that is substantial in the overall context of the employer's business — not merely a small cost or inconvenience.

1 The Legal Framework

Title VII coverage

Title VII generally applies to private employers, state and local governments, and educational institutions with 15 or more employees. It prohibits discrimination because of religion and requires reasonable accommodation unless it would impose an undue hardship. State or local law may cover smaller employers or impose different standards.

What may qualify as religion

Title VII protects traditional organized religions and beliefs that are new, uncommon, not part of a formal church, or held by a small number of people. It can also protect moral or ethical beliefs held with the strength of traditional religious views. Purely political, social, economic, or personal preferences are not religious beliefs merely because they are strongly held.

Federal combined damages caps by employer size

EMPLOYEES	FEDERAL COMBINED CAP*
15–100	\$50,000
101–200	\$100,000
201–500	\$200,000
More than 500	\$300,000

*Caps do not limit back pay or front pay and do not necessarily limit remedies under other laws. Punitive damages are not available against government entities under Title VII.

The Groff standard

In *Groff v. DeJoy*, the Supreme Court rejected the shorthand that any cost greater than de minimis establishes undue hardship. An employer must show that the burden of granting the accommodation would result in substantial increased costs in relation to the conduct of its particular business. The analysis is context-specific and accounts for the nature, size, operating costs, and practical effect of the proposed accommodation.

2 The First Response

DO NOW	AVOID
Thank the employee for raising the issue and confirm it will be reviewed.	Do not debate the belief, promise an outcome, or reject the request immediately.
Record the date, the request, the work conflict, and who received it.	Do not insist that the employee use a form before beginning review.

DO NOW

Route the matter to HR or the designated decision-maker.

Consider a temporary arrangement if a decision cannot be made before the conflict occurs.

Limit information to those who need it to evaluate or implement the request.

AVOID

Do not let multiple managers give separate answers.

Do not discipline for the conflict while the request is unresolved without counsel review.

Do not share the employee's religious information with coworkers unnecessarily.

MANAGER ACKNOWLEDGMENT SCRIPT

"Thank you for letting me know. We take requests related to religious beliefs and practices seriously. I will share this with the person who handles accommodation requests so we can understand the conflict and discuss possible options. We may need some additional information, but you do not need to resolve everything with me today."

3 Understanding the Request

A request can be oral or written. The employee does not need to say "Title VII," "religious accommodation," or any other special phrase. The employer must have enough notice to understand that a religious belief or practice conflicts with a work requirement.

QUESTIONS THAT HELP CLARIFY

- What work requirement, schedule, duty, policy, or event creates the conflict?
- What religious belief, practice, or observance is involved?
- What change is the employee requesting, and for how long?
- Are particular dates, times, items, activities, or job duties involved?
- Would another arrangement resolve the conflict?
- Is the need recurring, intermittent, temporary, or permanent?
- Is a decision needed by a particular date?

QUESTIONS TO AVOID

- "Is that a real religion?"
- "Where does your scripture require that?"
- "Why did you not follow this practice before?" (asked as an accusation)
- Questions about unrelated religious beliefs or practices.
- Clergy verification as an automatic condition of review.

4 Evaluating Sincerity

Sincerity is ordinarily presumed. A belief can be sincere even if it is newly adopted, inconsistently observed, not mandated by a faith community, or different from the beliefs of family members or coworkers. Beliefs and practices can change over time.

Facts that may justify limited follow-up

- The employee has behaved in a manner markedly inconsistent with the professed belief (though inconsistency alone may have an explanation).
- The timing or surrounding facts suggest a secular benefit rather than a religious conflict.
- The employee seeks an unusually desirable benefit and offers little explanation of the religious connection.
- The employee provides a reason to doubt the credibility of the explanation.

A careful review

1. Identify the objective fact that created the question.
2. Ask neutral, focused questions and allow the employee to explain.
3. Consider the complete record rather than one isolated fact.
4. Do not evaluate whether the belief is correct, reasonable, orthodox, or consistent with the employer's theology.
5. Consult counsel before denying a request based on lack of sincerity.

5

Exploring Reasonable Accommodations

The goal is an effective adjustment that eliminates the conflict between the religious practice and the work requirement, unless doing so would create undue hardship. The employer should confer fully and promptly with the employee and consider more than one option when the initial request presents difficulty.

CATEGORY	POSSIBLE OPTIONS
Scheduling	Flexible arrival or departure; voluntary shift swaps; schedule exchanges; floating holidays; available paid or unpaid leave; modified break times; alternative meeting or training time.
Dress and grooming	Exception to uniform, hair, head-covering, jewelry, facial-hair, or appearance rules; alternative protective equipment where safe and effective.
Religious observance	Time and appropriate space for prayer; schedule adjustments for Sabbath or holy days; voluntary substitutes.
Job duties or events	Task reassignment; excusal from a discrete activity; alternative assignment; transfer to a vacant position; modified participation where essential work is still performed.
Religious expression	Reasonable personal expression consistent with rules against harassment, disruption, coercion, and interference with operations.

CATEGORY	POSSIBLE OPTIONS
Training or pledges	Alternative timing, format, wording, or method of acknowledging receipt where the alternative satisfies the legitimate business purpose.

THE EMPLOYEE'S PREFERRED OPTION

An employer is not always required to provide the employee's preferred accommodation if another reasonable option effectively resolves the conflict. Before selecting an alternative, confirm that it will actually permit the employee to observe the belief or practice. Document why the option was chosen.

TEMPORARY MEASURES

When review will take time, consider a temporary arrangement that preserves operations and avoids forcing the employee to violate the asserted belief before a decision is reached. A temporary measure is not necessarily a final determination and should be documented as such.

6 Applying the Groff Undue Hardship Standard

Undue hardship requires more than a minor cost, administrative inconvenience, or generalized coworker dissatisfaction. The employer should identify the actual burden, evaluate it in the context of the particular business, and consider whether another accommodation would avoid or reduce that burden.

STEP-BY-STEP ANALYSIS

- 1 Define the exact accommodation being evaluated.
- 2 Identify the operational effect: added cost, lost productivity, staffing change, safety risk, effect on other employees' established rights, legal conflict, or other concrete burden.
- 3 Measure the burden where possible using schedules, payroll data, overtime projections, production requirements, safety records, contracts, or other reliable evidence.
- 4 Evaluate the burden in the overall context of the organization's size, resources, operations, and the duration and frequency of the accommodation.
- 5 Consider alternatives that could resolve the religious conflict with less burden.

- 6 Document the facts, assumptions, alternatives, and conclusion.
- 7 Obtain counsel review before communicating a denial or taking adverse action.

EVIDENCE BY CATEGORY

ISSUE	STRONGER EVIDENCE	WEAK OR INSUFFICIENT BY ITSELF
Cost	Projected overtime, substitute labor, lost contracts, or recurring expense supported by records.	"It will cost too much" without calculations or context.
Operations	Specific coverage gap, production delay, service failure, or inability to perform essential work.	General concern that scheduling may become difficult.
Safety or security	Documented hazard analysis, legal requirement, incident history, or qualified safety assessment.	An untested assumption or stereotype.
Coworker impact	Violation of a seniority right, forced recurring burdens, or material effect on working conditions.	Hostility to religion, customer prejudice, or ordinary coworker complaints.
Legal or third-party	A concrete conflict with law, binding rights, or a valid contractual obligation.	A vague fear that someone might object.

7 Special Issues for Christian Employers

Accommodation duties protect beliefs the employer may not share

A Christian employer may receive a request based on another religion or a conviction that differs from the organization's doctrine. Covered employers should use the same neutral process for every request. Do not make theological agreement a condition of review.

Religious organization hiring rights

Title VII includes an exemption permitting qualifying religious organizations to employ individuals of a particular religion for work connected with the organization's activities. Whether an employer qualifies and how the exemption applies are fact-specific. The exemption does not provide a general license to discriminate on other protected grounds.

Ministerial exception

The First Amendment's ministerial exception may bar certain employment claims involving employees who perform important religious functions. Job title alone does not decide whether the exception applies. Use a separate ministerial role-classification review and consult counsel before relying on the exception.

Mission or doctrine conflict

If a requested accommodation may require the organization to affirm, facilitate, or materially compromise its religious doctrine or mission, do not treat the issue as a routine HR denial. Document the precise conflict, preserve the employee's request, avoid retaliatory action, and seek advice from counsel experienced in both employment and religious-liberty law.

8 Common Request Categories

REQUEST	KEY QUESTIONS
Sabbath or holy-day scheduling	Can shifts be exchanged voluntarily? Is leave available? Can start or end times change? What is the measurable staffing or service effect?
Prayer or observance during work	Can timing or location be adjusted? Does the practice affect safety, essential coverage, or operations?
Dress or grooming	Is the rule job-related? Is there a documented safety or sanitation reason? Can alternative equipment or uniform options address it?
Religious expression	Is the expression personal and noncoercive? Does it create harassment, disruption, or confusion about official organizational speech?
Objection to a task or event	Is the task essential? Can it be reassigned without substantial burden? Would excusal affect others' rights or impose recurring operational costs?
Training, statement, or acknowledgment	Can the legitimate objective be met through alternate wording, an acknowledgment of receipt, or another format?
Vaccination or medical requirement	What is the religious basis and workplace conflict? Are remote work, testing, masking, reassignment, or other measures available? Are separate federal, state, local, or contractual rules involved?
Conflict involving another employee	Can both employees' rights be respected? Would the proposed option create harassment, coercion, or a material burden on another employee's job rights?

9 Decision and Implementation

IF GRANTING

- Describe the accommodation clearly, including start date, duration, and responsibilities.
- State any legitimate conditions for implementation.
- Explain how to report a problem or changed circumstance.
- Set a review date when temporary or dependent on conditions.

IF OFFERING ALTERNATIVE

- Explain the option and confirm how it resolves the religious conflict.
- Invite prompt feedback and document the employee's response.
- If the employee says the alternative is ineffective, ask why and evaluate the explanation before closing.

IF DENYING

- Identify the accommodation evaluated and the substantial burden it would create.
- Describe the evidence and list alternatives considered.
- Have counsel review the analysis and letter before delivery.
- Do not combine denial with discipline without counsel review.

10 Documentation and Confidentiality

MAINTAIN ONE COMPLETE FILE

- Initial request and date received
- Acknowledgment and interim measures
- Notes of discussions with the employee
- Options considered and employee responses
- Cost, scheduling, safety, or operational data used
- Comparators or prior decisions reviewed for consistency
- Final decision, implementation terms, and follow-up

WRITE FACTS, NOT CONCLUSIONS

PREFER	AVOID
"Coverage requires one certified technician 6–10 p.m.; no qualified volunteer was available."	"We cannot make exceptions."
"Projected overtime is 24 hours per month at \$____ estimated cost."	"This would be too expensive."
"We evaluated shift exchange, modified start time, leave, and transfer to open role."	"No alternatives exist."

Limit religious information and accommodation records to personnel who need them for evaluation, legal review, or implementation. Managers and coworkers ordinarily need to know the operational instruction — not the employee's diagnosis, theology, supporting materials, or private explanation. Before deciding, compare similar requests and record the material facts that justify any different result.

11 Escalation and Counsel Review

Seek qualified counsel promptly when any of the following is present:

Possible denial or disputed sincerity

Discipline, discharge, reduced hours, reassignment, or other adverse action

A mission, doctrine, religious hiring, or ministerial-exception issue

Speech, pronouns, facilities, dress, grooming, healthcare, vaccination, or other legally contested issue

Safety, security, licensing, government-contract, or patient-care requirements

Competing accommodation requests or another employee's rights

Overlap with disability, pregnancy, leave, wage-and-hour, union, or state-law obligations

An EEOC charge, agency inquiry, demand letter, attorney contact, or threat of litigation

12

Manager Scripts and Practical Tools

RECEIVING A VERBAL REQUEST

"I understand that a religious belief or practice may conflict with a work requirement. Thank you for telling me. I am going to document the request and connect you with [HR/contact]. We will review possible options and follow up by [date]."

REQUESTING CLARIFICATION

"To evaluate the request, we need to understand the work requirement that conflicts with your religious belief or practice, the nature of the conflict, and the adjustment you are requesting. Please provide only the information needed to explain those points."

DISCUSSING ALTERNATIVES

"The option you requested may create difficulty because [specific reason]. We have not made a final decision. We would like to discuss whether [alternative] would resolve the religious conflict and whether you see another workable option."

IMPLEMENTING AN APPROVED ACCOMMODATION

"Your request has been approved as described in the attached terms, beginning [date]. Please tell [contact] promptly if the accommodation does not resolve the conflict or if circumstances change."

RESPONDING TO COWORKER QUESTIONS

"The organization reviews workplace adjustments individually and does not discuss another employee's private information. Please follow the schedule and assignment communicated to you. Bring any operational concern to [manager/HR]."

DECISION CHECKLIST

☐ Request and deadline identified	☐ Coverage under federal, state, and local law reviewed
☐ Religious nature and sincerity accepted or questions documented	☐ Employee consulted promptly
☐ Preferred accommodation evaluated	☐ Other effective options considered
☐ Actual costs and operational effects measured	☐ Safety or third-party concerns supported by facts
☐ Comparable decisions reviewed	☐ Retaliation risk assessed
☐ Counsel review completed where indicated	☐ Written decision and follow-up date prepared

13 Sample Forms and Letters

RELIGIOUS ACCOMMODATION INTAKE FORM

Employee or applicant	Job title or position sought
Date received	Received by
Work requirement, policy, schedule, duty, or event creating the conflict	
Religious belief, practice, or observance involved and how it conflicts	
Accommodation requested	
Date accommodation is needed	Duration or frequency
Other options the employee believes would resolve the conflict	
Interim arrangement, if any	
Next meeting or response date	

A request may be made orally, and use of this form is not a condition for beginning the review process.

ACCOMMODATION REVIEW WORKSHEET

STEP	RECORD
1 Request	What adjustment is requested? What religious conflict would it resolve?
2 Essential requirements	Which job duties, rules, schedules, safety requirements, or business needs are involved?
3 Information reviewed	What did the employee explain? Was additional information reasonably necessary?
4 Options considered	List the preferred option and each meaningful alternative.
5 Employee input	What did the employee say about each option?

STEP	RECORD
6 Cost and operations	Record calculations, schedules, staffing data, productivity effects, and duration.
7 Safety and rights	Identify evidence of safety, legal, contractual, or other employees' job-right concerns.
8 Groff analysis	Would the burden be substantial in the overall context of this business? Explain.
9 Consistency	What comparable requests or exceptions were reviewed?
10 Decision	Grant, alternative, temporary approval, or denial. State reasons and review date.
11 Review	Decision-maker and counsel review, if required.

SAMPLE LETTERS

SAMPLE APPROVAL LETTER

Dear [Employee]: We have completed our review of your request for a religious accommodation. Beginning [date], the organization will provide the following accommodation: [describe the adjustment, schedule, duration, and implementation terms]. Please contact [name/title] promptly if this accommodation does not resolve the identified religious conflict, if your needs change, or if an implementation issue arises. [If applicable: We will review the arrangement on [date].] The organization prohibits retaliation for requesting or receiving a religious accommodation.

SAMPLE ALTERNATIVE ACCOMMODATION LETTER

Dear [Employee]: Thank you for discussing your request with us. We understand the religious conflict to be [brief neutral description]. After reviewing your requested option and the alternatives discussed, the organization is offering the following accommodation: [describe]. We believe this option resolves the identified conflict because [explain]. Please tell [contact] by [date] whether the accommodation will permit you to observe the belief or practice. If it will not, please explain the remaining conflict so we can evaluate the issue further.

SAMPLE DENIAL LETTER FRAMEWORK (USE ONLY AFTER INDIVIDUALIZED REVIEW AND COUNSEL CONSULTATION)

Dear [Employee]: We reviewed your request for [accommodation] and met with you on [dates]. We considered [requested option and alternatives]. The organization is unable to provide the requested accommodation because the evidence shows it would impose the following substantial burden in the overall context of our business: [specific facts, measured cost or operational effect, duration, and business context]. We also considered [alternatives]. [Explain why each would not resolve the conflict or would create a substantial burden.] Please contact [name/title] by [date] if you have additional information or another option to consider. The organization prohibits retaliation for requesting an accommodation.

☐ Name the person responsible for religious accommodation requests and a backup contact.

☐ Train supervisors to recognize oral and informal requests and route them promptly.

☐ Review the handbook and request procedure for the post-Groff undue hardship standard.

☐ Confirm that forms do not require clergy verification or a written request in every case.

☐ Review schedule, dress, grooming, attendance, training, expression, and conduct policies for rigid no-exception language.

☐ Create a secure location for accommodation records.

☐ Review prior decisions for consistency and recurring operational issues.

☐ Confirm a process for temporary measures while a request is pending.

☐ Identify counsel experienced in employment and religious-liberty matters.

☐ Review state and local requirements for every jurisdiction in which employees work.

TOPIC	AUTHORITY
Title VII religious accommodation requirement	42 U.S.C. §§ 2000e(j), 2000e-2; eeoc.gov/statutes/title-vii-civil-rights-act-1964
Supreme Court undue hardship standard	<i>Groff v. DeJoy</i> , 600 U.S. 447 (2023)
EEOC religious accommodation guidance	eeoc.gov/laws/guidance/section-12-religious-discrimination
Federal remedies and damages caps	eeoc.gov/employers/remedies-employment-discrimination
Religious organization exemption	42 U.S.C. § 2000e-1(a)
Ministerial exception	<i>Hosanna-Tabor</i> , 565 U.S. 171 (2012); <i>Our Lady of Guadalupe</i> , 591 U.S. 732 (2020)

Legal Disclaimer

This guide provides general educational information and is not legal advice. It does not create an attorney-client relationship with Christian Employers Alliance, its staff, or any attorney. Employment laws vary by jurisdiction and circumstances, and legal standards and agency guidance may change.

Before acting on a specific workplace matter — especially a denial, discipline, discharge, disputed-sincerity determination, or mission-related conflict — consult qualified legal counsel. Employers should also review applicable state and local law and any contractual or industry-specific obligations.

MEMBER NOTE

CEA members may use this guide to strengthen internal procedures, train appropriate leaders, and prepare for counsel review. Keep the completed forms and employee-specific records confidential and do not upload personally identifiable employee information to a shared portal or unsecured system.

Access CEA Member Resources

CEA members have access to pre-vetted employment counsel and additional HR guidance. Log in to the Member Portal or visit joinceanow.org.