

Policy: Religious Accommodation	Policy No:
Policy Owner(s): Human Resources	Original Date: 10/5/2022
Last Review Date: 10/5/2022	Last Revised Date:

- I. **POLICY:** John Carroll University (“the University”) does not tolerate religious discrimination against employees and is committed to diversity and inclusion in relation to fostering non-discrimination based on religion and providing [religious accommodations](#) as appropriate. Consistent with the mission, vision and values of the University and federal and state law, the University will attempt to make, upon request, reasonable accommodations to resolve conflicts between employees’ sincerely held religious beliefs and practices and work-related requirements, unless doing so imposes an [undue hardship](#) on the University.

- II. **PURPOSE:** The purpose of this policy is to create a process for reviewing requests for reasonable religious accommodations. Employees or job applicants can use this process to request accommodations to address conflicts between their religious practices and work-related requirements or policies of the University.

- III. **SCOPE:** All employees and job applicants of John Carroll University

- IV. **DEFINITIONS:**

Religious Accommodation Official (or Accommodation Official): A member of the Human Resources Department is the Religious Accommodation Official who engages in an interactive process with an individual seeking an accommodation, in consultation with the Office of Diversity, Equity, Inclusion & Belonging (DEIB) as appropriate.

Religious Accommodation: Any change or adjustment to a job or work environment that adequately addresses a conflict between an employee’s [sincerely held religious belief](#) and practice and a University work-related requirement or University policy. For an accommodation to be reasonable, it must not constitute an undue hardship to the University. Examples of accommodations may include:

 - Providing an employee with a time and place to pray
 - Permitting flexible scheduling

- Permitting employees to wear certain religious garb, beards, or hairstyles that would otherwise be contrary to uniform or personal appearance guidelines.
- Granting reasonable leave/vacation requests for religious observances
- Modification of a University policy to accommodate a religious practice, when reasonable to do so

Sincerely Held Religious Belief: Sincerely held religious beliefs include theistic beliefs as well as non-theistic moral or ethical beliefs as to what is right and wrong which are sincerely held with the strength of traditional religious views. Sincerely held religious beliefs can originate not only from traditional, organized religions such as Christianity, Judaism, Islam, Hinduism, and Buddhism, but also religions that are new, uncommon, not formally organized, or followed by a small number of people. An employee's belief or practice can be "religious" even if the employee is affiliated with a religious group that does not espouse or recognize that individual's belief or practice.

Undue Hardship: A request for accommodation that would cause John Carroll University a substantial burden in the overall context of the University's operations. This requires that the burden of granting an accommodation would result in substantial increased costs in relation to the conduct of the University's operations and business. Considerations include relevant factors in light of the facts, including the particular accommodations at issue and their practical impact in light of the nature, size, operations, and cost to the University.

V. PROCEDURES:

A. Requesting a Reasonable Accommodation:

1. An employee may request a [Religious Accommodation](#) by completing the Religious Accommodation Request Form (see Attachments to this policy) and submitting it to the [Religious Accommodation Official](#). While not required, the employee may choose to provide any supporting documentation of a [sincerely held religious belief](#) and/or any additional information that they believe may be of assistance as the [Accommodation Official](#) reviews the request. The [Accommodation Official](#) may reach out for additional documentation or information about the employee's accommodation request.
2. [Religious Accommodation](#) requests may be made verbally to the individual's supervisor. If a request is made verbally, the supervisor will refer the employee to the [Accommodation Official](#). The [Accommodation](#)

[Official](#) will request that the individual then complete the Religious Accommodation Request Form.

3. An applicant seeking a [Religious Accommodation](#) to participate in the application process may contact Human Resources for assistance. The University will not discriminate against or disqualify an applicant based on a request for religious accommodations.

B. Interactive Process: Once a Reasonable Accommodation request is made, the individual requesting the accommodation and the [Accommodation Official](#) will engage in a collaborative, interactive process in order to identify the individual's workplace accommodation needs. The [Accommodation Official](#) will:

1. Discuss the needs with the individual who made the request, including any preferences the individual has as to what type of [Religious Accommodation](#) they receive.

2. Contact the individual's supervisor or academic leader, when necessary, for questions regarding the job duties and any requested or proposed Religious Accommodations and any impact on departmental operations; and

3. Determine an appropriate [Religious Accommodation based on a fact-specific inquiry](#), and communicate that determination to the individual and to the supervisor or academic leader, in consultation with the DEIB Office, as appropriate. While employee or applicant requests as to accommodations will be considered, the [religious accommodation](#) granted will be determined by the University, and may be an alternative accommodation from the one requested.

4. Each request for a [religious accommodation](#) is evaluated on a case-by-case basis to determine if the accommodation is reasonable or would create an [undue hardship](#) on the University.

Examples of an [undue hardship](#) may include but are not limited to:

- Having the University permanently pay additional pay or overtime to another employee or hire another full time employee, or having the University deny other employees their scheduled shifts and positions of employment, if the accommodation has a substantial financial effect on the operations in the context of University business.
- An accommodation that causes a substantial burden on the University in the overall context of the University operations, and in particular resulting in substantial financial costs to operations.
- Having the University violate state or federal law
- Having the University endanger the health or safety of other employees

- Having the University compromise the image or reputation of the University or require action that would be inconsistent with its mission or denigrate the University's Jesuit Catholic identity.

C. Resources for Issues or Concerns: Issues or concerns about religious accommodations can be directed to the Human Resources Department.

D. Appeal: The determination as to a religious accommodation may be appealed within five (5) calendar days of receipt of the determination via the appeal process outlined in the Non-Discrimination, Non-Harassment and Bias-Related Incident Policy. Faculty members may appeal the resolution provided for in the outcome letter consistent with relevant policies and procedures governing the conduct of faculty members, including the Faculty Handbook (i.e. policies related to faculty standards of conduct or the Faculty Handbook Discrimination Grievance Procedures, if applicable).

VI. CROSS REFERENCES

Non-Discrimination, Non-Harassment, and Bias-related Incident Policy

VII. ATTACHMENTS:

Religious Accommodation Form-

https://docs.google.com/forms/d/e/1FAIpQLSeR03eg0-wQyh66cv7L-KKST5ewX5mRBEcBUI73C4KrnBZ0WA/viewform?usp=sf_link