

SUPREME COURT OF THE UNITED STATES

Groff v. DeJoy, Postmaster General

35 F. 4th 162 (3d Cir. 2022) (2023) · No. No. 22-174 · Decided June 29, 2023

SUMMARY

The Supreme Court interpreted Title VII’s requirement that employers reasonably accommodate employees’ religious practices unless doing so would impose an undue hardship. The Court rejected the view that any cost more than de minimis establishes undue hardship and held that an employer must show that granting an accommodation would result in substantial increased costs in relation to the conduct of its particular business. The Court vacated the Third Circuit’s judgment and remanded for application of the clarified standard.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Alito; Chief Justice Roberts; Justice Thomas; Justice Sotomayor; Justice Kagan; Justice Gorsuch; Justice Kavanaugh; Justice Barrett; Justice Jackson
JURISDICTION	Federal
DECIDED	June 29, 2023
DOCKET	No. 22-174
DISPOSITION	vacated
PROCEDURAL POSTURE	Petition for certiorari from the Third Circuit’s affirmance of summary judgment for the United States Postal Service in a Title VII religious-accommodation action.
STANDARD OF REVIEW	The Supreme Court reviewed the legal standard governing Title VII’s undue-hardship defense and vacated the judgment below; the context-specific application of that standard was left to the lower courts in the first instance.
PRECEDENTIAL VALUE	Binding precedent of the Supreme Court of the United States
PARTIES	Gerald E. Groff v. Louis DeJoy, Postmaster General

TOPICS

- religious discrimination
- title vii
- statutory interpretation
- federal employment law
- employment law

PRACTICE AREAS

employment law

employment discrimination

civil rights

federal employment law

QUESTIONS PRESENTED

1. What standard governs whether an employer has demonstrated an undue hardship under Title VII when denying a religious accommodation?
2. Whether the undue-hardship inquiry may consider impacts on coworkers and, if so, whether those impacts must affect the conduct of the employer's business.
3. Whether an employer must consider other reasonable accommodations rather than merely determine that one proposed accommodation would impose an undue hardship.

HOLDINGS

1. An employer denying a religious accommodation must show that the burden of granting the accommodation would result in substantial increased costs in relation to the conduct of the employer's particular business. A burden that is merely more than de minimis is insufficient.
2. Courts must consider all relevant factors in the particular case, including the accommodation requested and its practical impact in light of the nature, size, and operating cost of the employer.
3. Impacts on coworkers are relevant only to the extent they affect the conduct of the employer's business. Employee animosity toward a religion, religious practice, or accommodation cannot constitute undue hardship.
4. Title VII requires an employer to reasonably accommodate an employee's religious practice, not merely assess the reasonableness of one proposed accommodation. The employer must consider other options when appropriate.
5. The Third Circuit's judgment could not stand because it applied the erroneous more-than-de-minimis standard; the clarified standard must be applied by the lower courts in the first instance.

KEY QUOTATIONS

"We think it is enough to say that an employer must show that the burden of granting an accommodation would result in substantial increased costs in relation to the conduct of its particular business." (600 U.S. ___, 18 (2023))

"What is most important is that "undue hardship" in Title VII means what it says, and courts should resolve whether a hardship would be substantial in the context of an employer's business in the commonsense manner that it would use in applying any such test." (600 U.S. ___, 19 (2023))

"If bias or hostility to a religious practice or a religious accommodation provided a defense to a reasonable accommodation claim, Title VII would be at war with itself." (600 U.S. ___, 20 (2023))

FACTUAL BACKGROUND

Gerald Groff, an Evangelical Christian, believed that Sunday should be devoted to worship and rest. After the Postal Service began facilitating Sunday deliveries, Groff transferred to a rural station that initially did not make Sunday deliveries, but Sunday deliveries later began there as well. Groff declined to work Sundays, causing the Postal Service to redistribute his assignments to other employees and impose progressive discipline, after which he resigned and sued under Title VII.

PROCEDURAL HISTORY

The District Court for the Eastern District of Pennsylvania granted summary judgment to the Postal Service. The Third Circuit affirmed, applying a rule that an undue hardship existed when an accommodation required an employer to bear more than a de minimis cost. The Supreme Court granted certiorari, vacated the Third Circuit's judgment, and remanded for application of the clarified standard and consideration of whether further factual development was necessary.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The lower courts must apply the substantial-increased-cost standard in relation to the conduct of USPS's particular business, consider all relevant factors and possible accommodations, and determine whether further factual development is necessary.

CASES CITED

- Trans World Airlines, Inc. v. Hardison, 432 U.S. 63 (1977)
- Dewey v. Reynolds Metals Co., 429 F.2d 324, 334 (6th Cir. 1970), aff'd by an equally divided Court, 402 U.S. 689 (1971)
- Lemon v. Kurtzman, 403 U.S. 602, 612-613 (1971)
- Hardison v. Trans World Airlines, Inc., 527 F.2d 33, 42-44 (8th Cir. 1975)
- Teamsters v. United States, 431 U.S. 324, 352 (1977)
- EEOC v. Abercrombie & Fitch Stores, Inc., 575 U.S. 768, 775 (2015)
- Adeyeye v. Heartland Sweeteners, LLC, 721 F.3d 444, 455-456 (7th Cir. 2013)
- National Assn. of Mfrs. v. Department of Defense, 583 U.S. 109 (2018)
- Bartenwerfer v. Buckley, 598 U.S. 69, 74 (2023)
- Intel Corp. Investment Policy Comm. v. Sulyma, 589 U.S. ____ (2020)
- George v. McDonough, 596 U.S. ____ (2022)
- EEOC v. Walmart Stores East, L.P., 992 F.3d 656, 659-660 (7th Cir. 2021)
- Small v. Memphis Light, Gas & Water, 593 U.S. ____ (2021)
- Patterson v. Walgreen Co., 589 U.S. ____ (2020)
- Kimble v. Marvel Entertainment, LLC, 576 U.S. 446, 456-457 (2015)

- Wards Cove Packing Co. v. Atonio, 490 U.S. 642 (1989)
- Ledbetter v. Goodyear Tire & Rubber Co., 550 U.S. 618 (2007)
- EEOC v. Sambo's of Georgia, Inc., 530 F. Supp. 86, 89 (N.D. Ga. 1981)

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