

A church is not exempt from disability accommodation. The good news: the process is simple, mostly free, and is really just hospitality with a paper trail. Here's the whole thing on one page.

THE PROCESS — SIX STEPS

1	Recognize the request	No magic words. A request is anything that puts you on notice an employee needs a change at work because of a medical condition — verbal, casual, or from a family member.
2	Begin the interactive process	Talk it through. List the essential functions of the job and the limitation the employee is experiencing. This is the conversation step — solutions come later.
3	Request information (if needed)	Only if the need isn't obvious. Send a narrow medical inquiry — functional limitations, not full records. Quarantine any genetic / family-history info (GINA).
4	Explore & choose	Brainstorm options; invite the employee's ideas. Pick one that is effective and not an undue hardship. Their preference matters but doesn't bind you. Log every option you weighed.
5	Implement	Turn it into action items with owners and dates. Tell only those who need to know — share work restrictions, never the diagnosis, unless the employee consents.
6	Monitor	Set a follow-up date and keep it. Re-check effectiveness as duties, equipment, or the condition change. If it stops working, loop back to Step 4. Document each check-in.

REMEMBER

- **Move fast.** Acknowledge promptly — EEOC guidance points to ~5 business days; don't let it drift past 30.
- **Document.** If it isn't written down, it didn't happen. Note the request, the talk, options weighed, and the decision.
- **Protect it.** Keep medical info confidential and filed separately from the personnel file.
- **Relax on cost.** Roughly half of accommodations cost nothing; most of the rest are low-cost.

JUST FOR CHURCHES

- **It still applies.** The religious exemption is narrow — it covers ministers and religious accommodation, not disability accommodation for ordinary staff.
- **Volunteers.** The duty attaches to employees, but today's volunteer is often tomorrow's hire. Be consistent.
- **One door.** Send requests to one trained point person so every staffer is handled the same way.
- **Mission + ADA.** You can hold staff to faith expectations and still accommodate a disability. They coexist.

Free help: Job Accommodation Network (JAN) — askjan.org · free, confidential A-to-Z accommodation ideas by disability and job function.

Questions? OutrightHR · Brian Huston, JD, SHRM-SCP · BHuston@outrightHR.com

*General information for training purposes, not legal advice for a specific situation.