



EMPLOYER REVIEW FORM | JURISDICTION: FEDERAL | VERSION 2026.1

Religious Accommodation Review Form

Review religious accommodation requests under the post-Groff standard: sincere belief, work conflict, options, and real hardship analysis.

WHAT THIS HELPS YOU DO

Use this form to review requests for religious accommodation — schedule, dress, grooming, practice — under the current 'substantially increased costs' hardship standard, with consistency across requests.

WHEN TO USE THIS DOCUMENT

- When an employee requests schedule changes for worship or observance
- When dress code or grooming policy conflicts with religious practice
- When an employee objects to a task, training, or event on religious grounds
- Before denying any religious accommodation request
- When accommodation requests conflict with other employees' schedules

WHAT THIS DOCUMENT HELPS PREVENT

- Title VII religious discrimination claims from reflexive denials
- Hardship denials based on the outdated 'de minimis' standard
- Sincerity interrogations that become their own claims
- Inconsistent handling — one faith accommodated, another refused
- Dress and grooming policies enforced into litigation

Faulkner HR Solutions focuses on the system behind the people problem. This tool is designed to help employers slow down the decision, identify the risk, and create proof before the issue becomes a claim, complaint, turnover event, or credibility problem.

BEFORE YOU START: READINESS CHECKLIST

Gather the following before working through this document. Incomplete inputs are one of the most common reasons employer decisions fail under later scrutiny.

Have it	Input	Notes / location
☐	Employee name and role	
☐	Date of incident, request, or separation	



Have it	Input	Notes / location
☐	Supervisor involved	
☐	Policy or handbook section that applies	
☐	Prior documentation on file	
☐	Pay records, if applicable	
☐	Relevant emails, texts, notes, or complaints	
☐	Decision-maker name	
☐	Deadline, if applicable	



RELIGIOUS ACCOMMODATION REVIEW

Since *Groff v. DeJoy*, denying a religious accommodation requires showing substantially increased costs to the business — a much higher bar than the old 'more than trivial' standard. Review accordingly.

Part 1 — Request Record

Employee name and position	
Date of request and to whom it was made	
Religious belief, practice, or observance described (employee's words)	
Work rule, schedule, or duty it conflicts with	
Accommodation requested	

Part 2 — Sincerity (handle with care)

Sincerity is presumed. Question it only with objective reason — and never based on how mainstream, familiar, or consistent-looking the belief is.

Confirmed	Sincerity guardrail	Notes
☐	Belief accepted at face value absent objective contrary evidence	
☐	No demands for clergy letters or doctrinal proof as a default	
☐	Newly adopted or non-traditional beliefs treated the same as established ones	
☐	Any sincerity question routed to HR — never debated by the supervisor	

Part 3 — Conflict Analysis

Exact work requirement in conflict (policy section, schedule, duty)	
Frequency of the conflict (weekly, seasonal, one-time)	
Business purpose of the conflicting requirement	
Is the requirement actually enforced consistently today?	

**Part 4 — Accommodation Options**

Option	Resolves the conflict?	Cost / operational impact (specific)	Feasible?
Voluntary shift swaps (employer-facilitated)			
Schedule or shift modification			
Dress/grooming policy exception			
Task reassignment or job modification			
Lateral transfer			
Break or space accommodation for prayer/observance			

Part 5 — Undue Hardship Analysis (post-Groff standard)

Complete only if denial is contemplated. 'Coworkers might grumble' and administrative inconvenience do not meet the standard.

Specific accommodation being denied	
Substantially increased costs, shown with numbers or concrete operational facts	
Effect on safety, legal compliance, or other employees' rights (not preferences)	
Alternatives offered instead of outright denial	
Reviewed by (HR / counsel) before denial	

Part 6 — Consistency Check

Checked	Consistency question	Findings
☐	How have similar requests (religious or secular — medical, parental) been handled?	
☐	Are exceptions to this rule already made for non-religious reasons?	
☐	Would this denial look even-handed next to those exceptions?	



Part 7 — Decision Record

Decision and effective date	
Communicated to employee (date, by whom, in writing)	
Implementation notes for supervisor	
Review date if circumstances may change	

Role	Name / signature	Date
Reviewed by (HR)		
Decision authority		

STOP AND REVIEW BEFORE ACTING

If any statement below is true, pause. Get the decision reviewed by HR, counsel, or Faulkner HR Solutions before you act.

- ☐ The proposed denial rests on coworker complaints or customer preference.
- ☐ The supervisor has been debating theology with the employee.
- ☐ The same rule is already waived for medical or personal reasons.
- ☐ The hardship analysis contains adjectives but no numbers.
- ☐ The employee has been disciplined for the conflict while the request was pending.
- ☐ The belief was dismissed because it seemed unfamiliar or newly adopted.

MINIMUM DOCUMENTATION STANDARD

Before this file is closed, the employer should be able to answer every question below and point to where the proof lives.

Question	Your answer / where the proof is stored
What happened?	
When did it happen?	
Who observed or reported it?	
What policy, standard, deadline, or expectation applies?	



Question	Your answer / where the proof is stored
What decision was made?	
Who had authority to make the decision?	
What alternatives were considered?	
What risk was reviewed?	
What follow-up is required?	
Where is the proof stored?	

COMMON MISTAKES

1. Applying the dead 'de minimis' standard — Groff raised the bar to substantially increased costs.
2. Interrogating sincerity as the first move.
3. Denying schedule accommodations without even attempting voluntary swaps.
4. Enforcing grooming policies rigidly against religious practice while granting style exceptions elsewhere.
5. Treating coworker irritation as undue hardship.
6. Deciding inconsistently across faiths — the comparison will be made for you later.

WHAT TO DO NEXT

Implement the accommodation and brief the supervisor on exactly what was agreed. If denial is contemplated at any point, complete the hardship analysis with specific facts and get it reviewed before communicating — religious accommodation denials are among the easiest claims for an employee to file and among the hardest for employers to defend after Groff.

Before you terminate, deduct, discipline, classify, or respond, get the decision reviewed.

Call 210.446.8730 or email thomas@faulknerhrsolutions.info.



Before you process payroll, terminate, classify, deduct, or respond to a claim, get the decision reviewed.

Need help applying this to a real workplace decision?

Faulkner HR Solutions helps Texas employers, nonprofits, municipalities, and growing businesses fix the people systems behind recurring workplace problems.

If this document raised a risk flag, do not guess your way through the next step.

Call: 210.446.8730

Email: thomas@faulknerhrsolutions.info

Website: faulknerhrsolutions.info

DISCLAIMER

This resource is provided for general employer education and planning purposes. It is not legal advice and does not create an attorney-client relationship. Employment laws, agency guidance, and local requirements may change. Employers should review the facts of each situation before acting and consult appropriate HR or legal counsel when needed.