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## Religious Accommodations for Sabbatarian Observance among Library Staff

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# Religious Accommodations for Sabbatarian Observance among Library Staff



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## **ABSTRACT**

Over the last twenty-five years, litigation related to religious discrimination in the workplace has been on the rise. One of the tension points has been the religious practice of Sabbath keeping, leading to employment scheduling conflicts. Title VII and its subsequent amendments require that employers seek “reasonable accommodations” for Sabbatarian observance. Such adjustments should not cause “undue hardship” to the employer, who is required to make a “good faith effort” at accommodation. This article discusses creative alternatives that managers of public libraries and nonsectarian academic libraries may implement when accommodating Seventh-Day Adventist and similar Sabbatarian staff members.

## **ACKNOWLEDGEMENT**

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## **Introduction**

In 2008, the Equal Employment Opportunity Commission (EEOC) published section 12 of its new *Compliance Manual*, covering the topic of religious discrimination. The EEOC issued the materials “in response to an increase in charges of religious discrimination, increased religious diversity in the United States, and requests for guidance from stakeholders and agency personnel investigating and litigating claims of religious discrimination” (Petty, 2011, p. 48). One of the examples in the EEOC *Compliance Manual* concerns a public library staff member who was prohibited from wearing a cross necklace pendant. The EEOC determined that her First Amendment free speech and free exercise of religion rights had been violated, and that her attire was not contrary to the First Amendment “establishment clause,” even in a public library (Equal Employment Opportunity Commission [EEOC], 2008, pp. 5, 72, 80).

Over the last decade, religious discrimination claims have risen more rapidly than most other protected categories of the Civil Rights Act of 1964 (Ghumman, Ryan, Barclay, & Markel, 2013, p. 439). The rise in incidents relates to many factors,

including increased religious diversity in the workforce, disparate worldviews, immigration issues, legal ambiguities, and the unique nature of religion compared to other protected categories (Ghumman et al., 2013, p. 447–451). For instance, courts have upheld the religious rights of workers who have moved from a more nominal status to a more devout status within the same faith tradition (Levy, 2000, p. 38; McDonald, 2003, p. 92).

Matters of religiously motivated dress and grooming are a common area of conflict emerging in the courts (Petty, 2011, p. 48). But providing alternative scheduling for religious observance is “the most requested religious accommodation” (Digh, 1998). For example, the EEOC reached a \$70,000 settlement on behalf of a practicing Muslim who was denied the use of accrued vacation time for an extended pilgrimage to Mecca (Petty, 2011, p. 48). One common point of contention concerns the accommodation of a weekly Sabbath observance. With the advent of seven-day workweeks, such tensions between work and faith are on the rise (Trottman, 2013, p. B1).

## Sabbatarianism

Devout followers of Judaism are known for keeping the Sabbath as a day dedicated to rest and religious observance, as enshrined in the Ten Commandments of the Hebrew Scriptures (Exodus 20:8–11). The Jewish Sabbath begins at sundown on Friday evening and continues until sundown Saturday. Among Christian denominations and sects, responses to the Sabbath Commandment remain diverse (Hartog, 2014, pp. 105–114, 121–124; Robinson, 2015). For instance, reformed theology has historically advocated keeping Sunday as the new Christian Sabbath (to various degrees). The *Westminster Confession of Faith* prohibits work and leisure activities on the “Lord’s Day,” which is to be set aside for worship and rest with acts of necessity and mercy alone exempted (XXI.7–8). By contrast, confessional Lutheranism maintains that the Sabbath Commandment has been abrogated along with all Mosaic ceremonial injunctions. The *Augsburg Confession of Faith* declares that “the keeping neither of the Sabbath nor of any other day is necessary,” from the standpoint of Christian liberty (XXVIII.57–61). Dispensationalists have also insisted that the Sabbath-keeping requirement is no longer in force today, as it is the only commandment of the Decalogue that is not repeated in the New Testament (Chafer & Walvoord, 1974, pp. 288–295).

Many employers do not realize that some Christian denominations and sects require a Friday-sundown to Saturday-sundown Sabbath observance similar to the Jewish practice. For example, the Seventh-Day Baptist General Conference, the Church of God (Seventh Day), and some Messianic Jewish-Christian movements keep the seventh-day Sabbath. (In addition, some non-Trinitarian religious movements, such

as the United Church of God [and similar offshoots of the Worldwide Church of God, originally founded by Herbert W. Armstrong] are also seventh-day Sabbatarian.) The largest Sabbatarian Christian sect, however, is Seventh-Day Adventism. Founded in 1863, there are now more than one million Seventh-Day Adventists in nearly 5,000 U.S. churches. Global membership stands at about seventeen million members in over two hundred countries (Mead, Hill, & Atwood, 2010). Over the last century and a half, many Seventh-Day Adventists have faced workplace discrimination: “Church officials estimate that every day, on average, two or three Adventists in the U. S. lose their jobs or are denied jobs because employers will not accommodate Saturday Sabbath observance” (Hayes, 2011).

The wide range of denominational views regarding a “Christian Sabbath” (or lack thereof) has historically affected discussions of Sunday library hours in Western cultures (Badams, 2002). As one example, social tensions arose regarding Sunday openings in British public libraries in the nineteenth century (Hedges, 2002). In 2002, a two-part essay by J. R. Doerksen in *The Christian Librarian* analyzed principles of Sunday “Sabbath” rest as applied to academic libraries in Christian contexts. He argued that librarians at Christian colleges and universities should advocate policies enforcing Sunday closures (Doerksen, 2002a, 2002b).

Religious organizations are generally exempt from the legal constraints of EEOC religious stipulations. For instance, religiously-affiliated institutions may ask employees to sign a statement of faith, and they may inquire into the religious beliefs and practices of possible hires, in accordance with institutional mission and position statements (Ghumman et al., 2013, p. 443; Megerman & Schander, 2013, p. 17). Therefore, this article will focus upon religious accommodations for Seventh-Day Adventists and similar Sabbatarians employed in libraries without religious oversight, such as public libraries and nonsectarian academic libraries.

## Legal Background

Title VII of the Civil Rights Acts of 1964 prohibits employment discrimination on the basis of race, color, sex, religion, and national origin. In relation to these protected categories, unlawful practices include employer attempts “to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment” (EEOC, 2009). Prohibited practice also includes employer attempts “to limit, segregate, or classify his employees or applicants for employment in any way which would deprive or tend to deprive any individual of employment opportunities or otherwise adversely affect his status as an employee” (EEOC, 2009). Educational institutions and local and state governments were added to the Title VII coverage in 1972.

Title VII applies to employers with fifteen or more regular employees (Bernstein, 2012), but state and local laws may apply to smaller companies (Prekert & Magid, 2006). The federal Religious Freedom Restoration Act (RFRA) of 1993 was held unconstitutional as applied to states, although it continues to be applied to the federal government. A federal Workplace Religious Freedom Act (WRFA) has been introduced into Congress multiple times since 1994, but has yet to pass. As of the 2015 legislative session, twenty states had passed RFRA's. State law may be more stringent than federal law in some jurisdictions: "In New York, for example, the recent enactment of the NYC Workplace Religious Freedom Act in 2011 makes it much more difficult for an employer to demonstrate undue hardship resulting from requests for religious accommodations" (Gray, 2012).

Employers may not discriminate against workers based upon their "bona fide" or sincerely-held religious beliefs (Ghumman et al, 2013, p. 439). According to EEOC guidelines, "a belief is religious not because a religious group professes that belief, but because the individual sincerely holds that belief with the strength of traditional religious views" (Huang & Kleiner, 2001, p. 132). Courts do not evaluate the merits of an employee's belief, only the sincerity of the belief (Bernstein, 2012). Religious freedom also includes religious practices and observances, as well as the freedom *not* to believe religious tenets (U.S Department of Labor, 2011).

To have a legal case, employees must be able to establish that they were subjected to adverse action (such as discipline or dismissal) after having notified their employer of personal religious beliefs causing employment conflict. Such notification should be done orally and/or in writing to one's immediate supervisor (U.S. Department of Labor, 2011). For their part, employers must establish that they offered "reasonable accommodations" and that a "good faith effort" was expended to find an alternative that does not cause undue hardship (Bernstein, 2012). A religious accommodation is "any adjustment to the work environment that will allow an employee or applicant to practice his or her religion" (U.S. Department of Labor, 2011).

According to the Anti-Defamation League (ADL), a "reasonable accommodation" is an adjustment "that eliminates the employee's conflict between his religious practices and work requirements and that does not cause an undue hardship for the employer" (ADL, 2012). Judging whether an accommodation should be required and whether it will cause undue hardship is "heavily fact-specific" (Bernstein, 2012). The "reasonableness" of an accommodation cannot be determined in a vacuum, and "reasonable" remains somewhat relative, without "a hard and fast meaning" (Aspen Publishers, 2006, p. 3). Furthermore, an employer is not bound to implement a worker's suggested accommodation but can seek a "reasonable" alternative (Levy, 2000, p. 38).

Employers must also take steps to prevent the religious harassment and degradation of their employees, and they may be held liable for failing to implement prompt and appropriate action to correct a religiously abusive environment. A religiously hostile environment involves severe or pervasive conduct, such as frequent discrimination, threatening or humiliating behavior, and interference with an employee's work performance (ADL, 2012). While simple teasing is not normally considered harassment, employees have the legal right to request that co-workers cease unwelcome and intimidating proselytization (U.S. Department of Labor, 2011). Employers may not treat employees more or less favorably because of their religion, may not require compulsory religious participation, may not prohibit religious activity as a condition of employment, and may not retaliate against workers who have asserted their religious rights (Ghumman et al., 2013, pp. 440-447; Walsh, 2015). Employers are also prohibited from discriminating against workers based upon their religious associations, such as connection with a religious organization or marriage to a religious adherent (U.S. Department of Labor, 2011). When discrimination occurs, the EEOC may seek reinstatement (in cases of dismissal), back pay, compensatory damages, punitive damages, and injunctive relief (EEOC, 2011).

## Recent Litigation

Employees are becoming more aware of their workplace rights, resulting in more litigation and more settlements (Atkinson, 2000, p. 14). The number of religious discrimination suits filed with the EEOC rose from under 1,400 in 1992 to over 1,800 in 1999 (Atkinson, 2000, p. 14). Moreover, between 1990 and 1999, the number of cases that resulted in an award settlement increased 48% (Huang & Kleiner, 2001, pp. 128-129). In 2001, Huang and Kleiner predicted that "requests for religious accommodation in the workplace may well explode over the next decade" (2001, p. 128). In fact, religious discrimination complaints doubled between 2000 and 2010, from around 1,900 to about 3,800 cases (Haynes, 2011; Ghumman et al., 2013, p. 440). Yet many experts believe that religious discrimination still remains underreported (Trottman, 2013, p. B1).

Sometimes public libraries tangle with religious convictions. In 2007, the Supreme Court refused to hear an appeal regarding the Faith Center Church Evangelistic Ministries of Orinda California (Kniffel, 2007, p. 18). The Contra Costa County Public Library did not allow the ministry to use its meeting rooms for religious services, based upon its understanding of the separation of church and state (Evans & Alire, 2013, p. 69). In 2012, the American Civil Liberties Union (ACLU) sued the public library in Salem, Missouri, on behalf of a patron who claimed that the library unconstitutionally blocked internet access to Wiccan websites (Associated Press, 2012). A few legal cases have directly involved library employment issues. In 2008, the ACLU filed suit against the City of Poplar Bluff, Missouri. The public library had disciplined a part-time employee who had objected to participating

in the promotion of a *Harry Potter* book. The Southern Baptist worker had cited her religious objections, believing that the *Harry Potter* books encouraged children toward witchcraft and the occult (ACLU, 2008).

Outside of libraries, Sabbatarian employment cases abound. In 2010, the Loving Construction Company was fined \$47,500 for firing three Seventh-Day Adventist laborers who refused to work on Saturdays (Murawski, 2010). In addition, the company had to purge the workers' records and provide them with reference letters. In 2012, Altec paid \$25,000 to settle an EEOC religious discrimination suit for refusing to accommodate a worker after discovering his Seventh-Day Adventist persuasion (EEOC, 2012). In 2013, an ownership group which operated a Comfort Inn paid \$45,000 to settle a lawsuit involving a Seventh-Day Adventist who was refused Saturday work accommodations and was eventually fired (EEOC, 2013). In 2015, a Dunkin' Donuts franchisee was fined \$22,000 for revoking a job offer given to a Seventh-Day Adventist worker after he informed them of his Sabbatarian convictions (EEOC, 2015). All four of these cases also resulted in mandatory anti-discrimination training for supervisors (and sometimes others), as well as required report-updates to the EEOC and/or the required posting of employees' religious rights. A Minnesota case involving a Seventh-Day Adventist nurse who requested Saturdays off is still pending. Her lawsuit seeks back pay, remuneration for job-search expenses, and compensation for "emotional pain, suffering, inconvenience, loss of enjoyment of life, and humiliation" (Walsh, 2015).

## **Rights and Responsibilities**

Employers may not enquire about religious beliefs, practices, or observances during a job interview (Moran, Stueart, & Morner, 2013, p. 208). Nor may they list religious requirements in job postings or advertisements. Employers are allowed to describe the regular days, hours, or shifts of a job's duties (ADL, 2012). They may even ask about working on Saturday or Sunday, but must do so of each applicant and may not frame the question in terms of religious observance (Moran et al., 2013, p. 209). As a rule, the interviewer may not address the subject of religious observance as relates to scheduling unless the interviewee broaches the topic first (Megerman & Schander, 2013, p. 17).

Management must make a "good-faith effort" to accommodate religious tenets and convictions, with reasonable accommodations short of "undue hardship" (Digh, 1998). For example, if wearing specific items of religious attire (such as a hijab) causes a safety risk, the clothing may be banned from the workplace (Petty, 2011, p. 48; Bernstein, 2012). According to the EEOC, a claim of "undue hardship" is permissible if the proposed accommodation "requires more than ordinary administrative costs, diminishes efficiency in other jobs, infringes on other employees' job rights or benefits, impairs workplace safety, causes coworkers to

carry the accommodated employee's share of potentially hazardous or burdensome work, or if the proposed accommodation conflicts with another law or regulation" (EEOC, 2008b). Accommodations may also be deemed "unreasonable" if they impair critical business functions or alter a company's core business model (Bernstein, 2012; Donahue, 2013).

The Supreme Court has defined undue hardship as "any act that would require an employer to bear greater than a '*de minimis* cost' in accommodating an employee's religious beliefs" (Aspen Publishers, 2006, p. 2). A "*de minimis* cost" is identified as making "minimal impact upon the agency's business" (U.S. Department of Labor, 2011). Therefore, undue hardship must involve more than ordinary administrative expenses (Huang & Kleiner, 2001, p. 132). According to the EEOC, "isolated or infrequent costs," such as the occasional paying of over-time wages for one employee to cover another's absence for religious observance, are generally considered a "*de minimis* expense" (Prekert & Magid, 2006, p. 483). When a collective bargaining agreement or seniority system is affected, matters can become more complex (Ghumman et al., 2013, p. 445), and these complications may affect undue hardship considerations (Muhl, 1998, p. 34; Bernstein, 2012). The undue hardship test can be "highly facts-specific" and "is best analyzed on a case-by-case basis" (Bernstein, 2012). Employers should not penalize employees who elect not to work during a religious holiday, but they are not required to pay workers for their absence due to religious observance (Digh, 1998).

For their part, employees may propose a possible compromise. Sufficient notice and the willingness to assist fellow workers when a similar need arises can go a long way (Megerman & Schander, 2013, p. 18). In some jurisdictions, employees must provide at least a one-week notice when requesting time off for a religious holiday (Digh, 1998). Moreover, an employee must act in a consistent manner regarding his or her religious tenets, and workers who claim religious exemptions must be able to support their cases (Atkinson, 2000, p. 16). Workers who claim a bona fide religious exemption but then go fishing or golfing on that same shift undermine their legal foundation (Haynes, 2011). In a few cases, courts have upheld workers' claims that their religious convictions not only preclude working on the Sabbath but also "causing others to sin" by asking them to work on the shift in question (McDonald, 2003, pp. 91-92).

### **Creative Alternatives**

According to a 1997 survey of 750 human resource professionals conducted by the Society for Human Resource Management, 68% offered flexible schedules for religious observance. Employers can provide alternative scheduling (including options to replace five eight-hour days), encourage voluntary swaps and substitutions, assign



floating “personal days,” allow lunch times to be exchanged for early departures, and offer job reassignments and lateral transfers (Huang & Kleiner, 2001, p. 135; Prenkert & Magid, 2006, p. 484).

Replacement work hours may be scheduled before or after the religious observance (U. S. Office of Personnel Management, 2016). Alternatively, an employee may opt for using paid leave (like vacation time or paid time-off), if available, for religious holidays (Guerin, 2016). If an employee has exhausted all paid time-off benefits, he or she may still be accommodated with unpaid leave (Levy, 2000, p. 39). “Specifically, pursuant to the Fair Labor Standards Act, an employer is not required to pay non-exempt (hourly) employees for time off on a holiday. . . . On the other hand, exempt employees (salaried employees who do not receive overtime), who are given the day off, must be paid their full weekly salary if they work any hours during the week in which the holiday falls” (Gray, 2012). Furthermore, the Supreme Court has ruled that “unpaid leave is not a reasonable accommodation when paid leave is provided for all purposes except religious ones” (U. S. Supreme Court, 1986).

Employers may discuss with their workers what is considered optional, preferential, and required by their religious beliefs. Supervisors should always document such conversations, the nature of the tension points, and any attempts at resolution (Digh, 1998). If a disturbance arises (such as a loud disagreement or a stormy exit from a meeting), the particulars should be documented as well (Digh, 1998). Moreover, employers should develop uniform metrics and should carefully calculate the costs of alternative accommodations (Ghumman et al., 2013, p. 442). On their side, employees are also encouraged to document any factors related to religious discrimination claims (Huang & Kleiner, 2001, p. 134).

Trial periods can be another valid strategy, in order to study increased expenses or possible hardships related to proposed accommodations (Atkinson, 2000, p. 17). Trial periods can provide both “an accurate assessment of the costs involved” and “further evidence of a good-faith effort at accommodation” (Levy, 2000, p. 40). In the late 1990s, the State of California was held liable for failing to accommodate a Seventh-Day Adventist who had offered to swap undesirable shifts for Saturdays. “At the very least, the court reasoned, the state should have allowed these types of accommodations on a temporary basis so that it could determine what actual hardships (such as low morale or a trend of similar requests from other employees) would result” (Levy, 2000, p. 39). Regarding scheduling conflicts tied to conferences and work training sessions (which often fall on weekends), employees may seek available substitutes, such as alternative sessions, recordings, or webinars (Megerman & Schander, 2013, p. 18).

## Conclusion

The Church State Council provides a “Sabbath Accommodation” sample letter that Seventh-Day Adventist pastors can fill out on behalf of church members in good standing (Church State Council, 2016). The letter specifically lists five of the creative alternatives discussed in this essay. If library managers and staff members are willing to work together, reasonable accommodations for employees can usually be found quite readily, without undue hardship for the employer. In a proactive manner, managers can train supervisors on handling religious accommodation requests, and they can inform employees of the rights and processes of religious accommodation (Petty, 2011, p. 48; Ghumman et al., 2013, p. 442). Managers should formulate objective and consistent employment criteria and policies, including clear anti-harassment guidelines that address religious discrimination (Ghumman et al., 2013, p. 442). These proactive steps will not eliminate all work-faith conflicts, but they will significantly reduce legal exposure.

Religious diversity is on the rise in the United States, creating new challenges and new demands for employers. As a result, managers should enhance their understanding of both religious practices and employment law. Unfortunately, many employers remain unfamiliar with “the growing variety of religions and cultures” in our increasingly diverse society (Huang & Kleiner, 2001, p. 128). Library managers (like other supervisors) must become students of diverse beliefs and observances (Ghumman et al., 2013, p. 452).<sup>1</sup>

Library managers may naturally fear litigation and monetary damages. Yet they should also consider the negative effects of a tainted reputation, strained community relationships, weakened morale and retention, and a tarnished ability to recruit top talent (Huang & Kleiner, 2001, p. 129). More fundamentally, librarians should value religious liberty and respect the freedom of religious expression, even as they serve in increasingly diverse and pluralistic contexts. †

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1 A newer resource that comprehensively covers the observance of religious holidays is J. G. Melton’s *Religious Celebrations: An Encyclopedia of Holidays, Festivals, Solemn Observances, and Spiritual Commemorations* (2011). The University of Missouri has e-published a helpful summary chart of religious holidays and suggested accommodations (2016).

## REFERENCES

- American Civil Liberties Union of Missouri. (May 27, 2008). *Suit filed on behalf of librarian over Harry Potter*. Retrieved from <http://www.aclu-mo.org/newsviews/2008/05/27/suit-filed-on-behalf-librarian-over-harry-potter>
- Anti-Defamation League. (2012). *Religious accommodation in the workplace: Your rights and obligations*. Retrieved from <http://www.adl.org/assets/pdf/civil-rights/religiousfreedom/religfreeres/ReligAccommodWPlace-docx.pdf>
- Aspen Publishers. (2006, September). Duty to accommodate religion in the workplace. *Fair Employment Practice Guidelines*, 616, 1-3.
- Associated Press (2012, January 4). Library patron sues after filter blocks religious sites. Retrieved from <http://www.firstamendmentcenter.org/library-patron-sues-after-filter-blocks-religious-sites>
- Atkinson, W. (2000). Divine accommodations: Religion in the workplace. *Risk Management*, 47(10), 12-17.
- Badams, R. (2002) Keeping Sunday Special in the Cotemporary Workplace Cutlutre. In G. A. Smith (Ed.), *Christian librarianship: Essays on the Integration of faith and profession* (pp. 172-180). Jefferson, NC: McFarland.
- Bernstein, R. H. (2012, April). Religious accommodation in the workplace: What employers and lawyers need to know. *ACC Focus on the New Jersey Chapter*. Retrieved from <http://news.acca.com/accnj/issues/2012-04-06/1.html>
- Chafer, L. S., & Walvoord, J. (1974). The Sabbath and the Lord's Day. In *Major Bible themes: 52 vital doctrines of the Scriptures simplified and explained* (Rev. ed., pp. 288-295). Grand Rapids, MI: Zondervan, 1974.
- Church State Council. (2016). *Sabbath accommodation – Pastor letter*. Retrieved from <http://www.churchstate.org/index.php?id=181>
- Digh, P. (1998, December). Religion in the workplace: Make a good-faith effort to accommodate. *HRMagazine*, 43(13), 84-91.
- Doerksen, J. R. (2002a). Never on a Sunday: The Sabbath and the Christian academic library, part 1. *The Christian Librarian*, 45(2), 58-61.
- Doerksen, J. R. (2002b). Never on a Sunday: The Sabbath and the Christian academic library, part 2. *The Christian Librarian*, 45(3), 106-109.
- Donahue, B. (2013, January 22). Rent-A-Center beats EEOC's religious bias suit. *Law 360*. Retrieved from <http://www.law360.com/articles/408726/rent-a-center-beats-eoc-s-religious-bias-suit>
- Equal Employment Opportunity Commission. (2008). *Compliance manual, section 12*. Retrieved from <http://www.eeoc.gov/policy/docs/religion.pdf>
- Equal Employment Opportunity Commission. (2011, June 27). Rent-A-Center sued by EEOC for religious discrimination: Rental company fired employee over Sabbath issue, federal agency charged. *Equal Employment Opportunity Commission Documents and Publications*. Retrieved from <http://www.eeoc.gov/eeoc/newsroom/release/6-27-11.cfm>
- Equal Employment Opportunity Commission. (2012, December 21). Altec to pay \$25,000 to settle EEOC religious discrimination lawsuit. *Equal Employment Opportunity Commission Documents and Publications*. Retrieved from <http://www.eeoc.gov/eeoc/newsroom/release/12-21-12a.cfm>
- Equal Employment Opportunity Commission. (2013, July 23). Nags Head Hotel to pay \$45,000 to settle EEOC religious discrimination lawsuit. *Equal Employment Opportunity Commission Documents and Publications*. Retrieved from <http://www.eeoc.gov/eeoc/newsroom/release/7-23-13.cfm>
- Equal Employment Opportunity Commission. (2015, July 15). Dunkin' Donuts franchisee will pay \$22,000 to settle EEOC religious discrimination lawsuit." *Equal Employment Opportunity Commission Documents and Publications*. Retrieved from <http://www.eeoc.gov/eeoc/newsroom/release/7-15-15b.cfm>
- Evans, G. E., & Alire, C. A. (2013). *Management basics for information professionals*. (3<sup>rd</sup> ed.) Chicago: Neal-Schuman.
- Ghumann, S., Ryan, A. M., Barclay, L. A., & Markel, K. S. (2013). Religious discrimination in the workplace: A review and examination of current and future trends. *Journal of Business Psychology*, 28, 439-454.

- Gray, K. A. G. (2012, October 10). Requirements for religious holidays. *Human Resource Executive: Online*. Retrieved from <http://www.hreonline.com/HRE/view/story.jhtml?id=534354455>
- Guerin, L. (2016). Workers may be entitled to time off for holidays. *Lawyers.com*. Retrieved from <http://labor-employment-law.lawyers.com/wage-and-hour-law/workers-may-be-entitled-to-time-off-for-holidays.html>
- Hartog, P. A. (2014). Constantine, Sabbath-keeping, and Sunday observance. In E. L. Smither (Ed.), *Rethinking Constantine: History, theology, and legacy* (pp. 104-129). Eugene, OR: Pickwick.
- Haynes, C. C. (2011). Workers' cruel choice: Your God or your job. *Daily Record*. Retrieved from Proquest at: <http://search.proquest.com>.
- Hedges, G. (2002). Nothing new under the sun? Public libraries and Sunday opening in the nineteenth century. In G. A. Smith (Ed.), *Christian librarianship: Essays on the integration of faith and profession* (pp. 165-171). Jefferson, NC: McFarland.
- Huang, C. C., & Kleiner, B. H. (2001). New developments concerning religious discrimination in the workplace. *International Journal of Sociology and Social Policy*, 21(8-10), 128-136.
- Kniffel, L. (2007, November). Supreme Court won't hear meeting room appeal. *American Libraries*, 38(10), 18.
- Levy, T. I. (2000, February). Religion in the workplace. *Management Review*, 89(2), 38-40.
- McDonald, J. J., Jr. (2003, Winter). What's God got to do with it? *Employee Relations Law Journal*, 29(3), 87-96.
- Mead, F. S., Hill, S. S., & Atwood, C. D. (2010). *Handbook of denominations in the United States*. (13<sup>th</sup> ed.). Nashville, TN: Abingdon.
- Megerman, S., & Schander, D. (2013, November). Religious observance and the workplace: Considerations for employees and employers. *AAL Spectrum*, 18(2), 17-18.
- Melton, J. G. (Ed). (2011). *Religious celebrations: An encyclopedia of holidays, festivals, solemn observances, and spiritual commemorations* (vols. 1-2). Santa Barbara, CA: ABC-Clio.
- Moran, B. B., Stueart, R. D., & Morner, C. J. (2013). *Library and Information Center Management* (8<sup>th</sup> ed.). Santa Barbara, CA: Libraries Unlimited.
- Muhl, C. J. (1998, October). Proper denial of religious accommodation. *Monthly Labor Review*, 121(10), 34.
- Murawski, J. (2010, September 25). Wrongly fired workers to get \$45,500. *McClatchy-Tribune Business News*.
- Petty, R. (2011, September 1). Employers challenged by duty to accommodate religious beliefs. *Employee Benefit News*, 25(11), 48.
- Prekert, J. D., & Magid, J. M. (2006, Fall). A Hobson's choice model for religious accommodation. *American Business Law Journal*, 43(3), 467-514.
- Robinson, T. E. (2015). Sabbath rest: Christian response to the Fourth Commandment. *The Christian Librarian*, 58(2), 112-116.
- Trottman, M. (2013, October 28). Religious-discrimination claims on the rise – Complaints include disputes over dress codes, working on the Sabbath and handling alcohol. *Wall Street Journal, Eastern Edition*, p. B1.
- University of Missouri, Chancellor's Diversity Initiative. (2016). *Major holidays and suggested accommodations*. Retrieved from <https://diversity.missouri.edu/get-involved/religion/holidays.php>.
- U. S. Department of Labor, Civil Rights Center. (2011). *Religious discrimination and accommodation in the federal workplace*. Retrieved from <http://www.dol.gov/oasam/programs/crc/2011-religious-discrimination-and-accommodation.htm>
- U. S. Office of Personnel Management. (2016). *Fact sheet: Adjustment of work schedules for religious observance*. Retrieved from <https://www.opm.gov/policy-data-oversight/pay-leave/work-schedules/fact-sheets/adjustment-of-work-schedules-for-religious-observances>
- Walsh, P. (2015, September 19). Feds: North Memorial punished nurse applicant who wanted Sabbath off. *Star Tribune*. Retrieved from <http://www.startribune.com/feds-north-memorial-punished-nurse-applicant-who-wanted-sabbath-off/328028591>