

# Religious Accommodation Policy

**Scope:** CITYWIDE

**Policy Contact:**

Human Resources Department

(916) 808-5731

[humanresources@cityofsacramento.org](mailto:humanresources@cityofsacramento.org)

**Table of Contents:**

I. Policy Statement.....	2
II. Definitions .....	2
III. Filing a Request for Religious Accommodation.....	3
IV. Review of Formal Requests for Reasonable Accommodations .....	5
V. Appeal Process .....	6
VI. Discrimination, Harassment, and Retaliation Prohibition and Complaints .....	6
Charter Officer Review and Acknowledgement .....	8
Attachment 1 – Religious Accommodation Request Form	
Attachment 2 – Review of Religious Accommodation Request Form	

**Regulatory References:**

California Code of Regulations, Title 2, §§ [11059-11063](#)

California Government Code, § [12940](#)

Federal Civil Rights Act of 1964, [Title VII](#)

**Supersedes:**

N/A – New Policy

**Reviewed/Effective:**

08/01/2025

## I. Policy Statement

The City of Sacramento (City) is committed to providing an inclusive work environment that is respectful of the religious beliefs, observances, and practices of its employees and job applicants.

It is the City's policy to make a good faith effort to provide accommodations to employees and job applicants to accommodate their religious beliefs, observances, or practices if reasonably possible, without imposing an undue hardship on the City.

The City is committed to a policy of equal employment opportunity and a discrimination-free work environment for all employees and job applicants.

## II. Definitions

- **Interactive Process:** A timely, good-faith communication between the employer and the applicant or employee with a known religious practice or belief that conflicts with a job requirement. Communication may be achieved in person, via email, or via telephone or video conference conversations.
- **Religion:** Includes any traditionally recognized religion as well as theistic or non-theistic beliefs, observances, or practices regarding moral or ethical beliefs about what is right and wrong, which are sincerely held with the strength of traditional religious views. It includes all aspects of religious belief, observance, and practice, including religious dress and grooming practices.
- **Religious Accommodation (RA):** An accommodation that eliminates or mitigates the conflict between the religious belief or practice and the job requirement. Examples of accommodations for religious beliefs, observances, or practices include, but are not limited to:
  - Schedule changes so the employee can attend religious services.
  - Time off to attend a one-time ritual ceremony.
  - A break schedule that will permit daily prayers at prescribed times.
  - A modification to a uniform requirement to allow for religious dress practices.

The City is not required to provide an accommodation that would impose an undue hardship or would present a direct threat to the health or safety of the employee, applicant, or others.

- **Religious Dress:** The wearing or carrying of religious clothing, head or face coverings, jewelry, artifacts, and any other item that is part of an individual observing a religious belief.

- **Religious Grooming:** Includes all forms of head, facial, and body hair that are part of an individual observing a religious creed.
- **Undue Hardship:** An action requiring substantial difficulty or expense when considered in relation to the size, resources, nature, and structure of the department's operations.

### III. Filing a Request for Religious Accommodation

A. Any applicant for employment, current employee, or their representative, may request a religious accommodation. The applicable department or the Department of Human Resources ADA and Leave Administration Office shall provide persons requesting an accommodation a Religious Accommodation Request Form (Attachment 1). It is the responsibility of the requester to complete the form in full and submit the form to their department or the ADA and Leave Administration Office.

1. Formal Religious Accommodation. An employee's accommodation may be considered formal when it requires a change or exemption from an established rule, policy, or procedure. Formal religious accommodation requests must be reviewed and approved through the ADA and Leave Administration Office.

a. A request is considered formal if it meets **any** of the following criteria:

- i. Significant Impact on Operations: The accommodation affects scheduling, workload distribution, or essential job functions.
- ii. Permanent or Long-Term Change: The request is ongoing or requires an indefinite modification to work conditions.
- iii. Potential Conflict with Policies or Regulations: The accommodation may impact safety standards, uniform policies, or legal obligations.
- iv. Requires Alternative Job Duties or Exemptions: The employee requests a change in job responsibilities to avoid religious conflicts.
- v. Involves Additional Resources or Costs: The accommodation requires new equipment, workspace modifications, or special materials.
- vi. Requires Evaluation for Undue Hardship: The request may create a burden on operations, coworkers, or the City's ability to meet service needs.

b. Examples of formal religious accommodation are:

- i. Granting exemptions from grooming standards.
- ii. Providing alternative personal protective equipment (PPE) to accommodate religious attire.

- iii. Excusing an employee from work on specific religious holidays when scheduling flexibility is limited.
2. Informal Religious Accommodation. In certain circumstances, employees may seek informal religious accommodation through their supervisory chain of command. Informal religious accommodation does not require a change or exemption from an established rule, policy, or procedure.

When a department grants an informal religious accommodation, they are required to keep a record of the accommodation granted and provide the record to the ADA and Leave Administration Office for records retention.

Employees whose request(s) for an informal religious accommodation is/are denied by their department may resubmit their request as a formal request for religious accommodation by submitting it in writing to the ADA and Leave Administration Office using the Religious Accommodation Request Form.

- a. A request is considered informal if all of the following conditions are met:
  - i. Minor Impact on Operations: The accommodation does not disrupt workflow, staffing levels, or essential duties.
  - ii. Temporary or One-Time Request: The accommodation is for a short duration (e.g., swapping a shift for a religious holiday).
  - iii. No Significant Policy Conflict: The accommodation does not conflict with established workplace policies, safety protocols, or legal requirements.
  - iv. No Additional Cost or Resources are Required: The accommodation does not require extra funding, equipment, or procedural changes.
  - v. Mutual Agreement Between Employee and Supervisor: The request is informally approved through a simple discussion.
- b. Examples of informal religious accommodations are:
  - i. Allowing an employee to leave work early or adjust their schedule to observe a religious holiday (e.g., attending Eid prayers or Passover Seder).
  - ii. Permitting an employee to wear religious head coverings (e.g., a yarmulke or hijab) when it does not conflict with uniform or safety policies.
  - iii. Allowing an employee a private space or flexible break schedule for daily prayers.

- iv. Allowing an employee to swap shifts with a coworker to avoid working on their Sabbath.
    - v. Allowing minor modifications to uniform appearance, such as wearing a small religious pin or necklace.
  - 3. Although the responsibility for requesting the religious accommodation rests primarily with the applicant or employee, the ADA and Leave Administration Office and the City's Labor Relations Manager are available as resources in the preparation, explanation, and dissemination of religious accommodation information or technical assistance.
- B. A completed Religious Accommodation Request Form must include the following:
- 1. Name, address, and telephone number of the person requesting the religious accommodation.
  - 2. A written statement from the requestor describing the specific conflict between the essential functions of the position and the applicant or employee's religious belief, observance, or practice.
  - 3. The accommodation being requested and an explanation of how the accommodation will not impede or interfere with the performance of the essential functions of the position.
  - 4. Verification of the applicant or employee's religious beliefs may be required.

#### **IV. Review of Formal Requests for Reasonable Accommodations**

- A. The City will review all requests for religious accommodation and engage in a timely, good-faith interactive process with qualified individuals. Every reasonable effort will be made to ensure confidentiality during this process.

The determination of whether to provide a religious accommodation is made on a case-by-case basis. This is an individual interactive process through which the department, the ADA and Leave Administration Office, and the qualified individual discuss religious accommodation solutions in good faith. The City will consider the preferences of the individual requesting accommodation when determining which accommodation option(s) to implement; however, the City has the ultimate discretion to choose between effective accommodation solutions.

- B. When a request for a formal accommodation is received by a department, the department will notify the ADA and Leave Administration Office of the request, and the ADA and Leave Administration Office will facilitate the interactive process between the department and the requestor. The following factors must be considered when reviewing a request for accommodation:

1. Analyze the job or activity to determine the essential functions.
  2. Identify the applicant or employee's religious belief, observance, or practice, and how their religious belief impacts their performance of the essential functions.
  3. Identify accommodation options that best mitigate impacts of the religious belief and determine the effectiveness and feasibility of the proposed reasonable accommodation options.
  4. Consider the requester's preference, and the City will select the religious accommodation most appropriate for the requester and the department.
- C. If the request is approved, the City will notify the requester and make the necessary implementation arrangements. If the request is denied, the requester may appeal to the Labor Relations Manager within thirty (30) calendar days (refer to Section V, Appeal Process).

The City is required to provide timely religious accommodations to all qualified individuals in accordance with this policy. If a department reviews and approves the request for accommodation, it shall provide the accommodation without undue delay, and shall provide documentation of the approved accommodation request to the ADA and Leave Administration Office.

## **V. Appeal Process**

- A. Denied requests for religious accommodation may be appealed to the Labor Relations Manager. The appeal must be submitted within thirty (30) calendar days from the date of notification by the City. The Labor Relations Manager shall review the matter and inform all parties of their decision. The department will provide all necessary information to facilitate this review.
- B. The decision of the Labor Relations Manager may be appealed to the City Manager. All appeals must be in writing and submitted within five (5) calendar days of notification of decision by the Labor Relations Manager. Upon notification of an appealed decision, the Labor Relations Manager shall forward all related documents to the City Manager. The decision of the City Manager is the final appeal.

## **VI. Discrimination, Harassment, and Retaliation Prohibition and Complaints**

Discrimination or harassment against an individual because of their actual or perceived protected characteristic, including religion, is strictly prohibited and will not be tolerated by the City. Additionally, retaliation against an individual for exercising their right to request a religious accommodation is strictly prohibited and will not be tolerated by the City.

These prohibitions apply to all employees, managers, supervisors, volunteers, board members, and other individuals covered by the City's [Equal Employment Opportunity Policy](#).

An employee may file a complaint through the City's discrimination and harassment complaint process, in the event they believe they are experiencing discrimination, retaliation, or harassment because of their protected characteristic, because they requested a religious accommodation, or because they have been denied access to the interactive process. Please refer to the [Equal Employment Opportunity Policy](#) for the processes and procedures for filing a discrimination complaint.



## Charter Officer Review and Acknowledgement

### RELIGIOUS ACCOMMODATION POLICY

(Signature by all Charter Officers is not a requirement for policy adoption)

A handwritten signature in blue ink, appearing to read "L. Milstein".

Leyne Milstein (Aug 14, 2025 13:57:35 PDT)

City Manager 08/14/2025

A handwritten signature in blue ink, appearing to read "S. Alcala Wood".

Susana Alcala Wood (Sep 10, 2025 17:18:09 PDT)

City Attorney 09/10/2025

A handwritten signature in blue ink, appearing to read "Mindy Cupoy".

City Clerk 09/11/2025

A handwritten signature in blue ink, appearing to read "John P. Gable Jr.". The signature is written in a stylized, cursive font.

City Treasurer 08/14/2025

A handwritten signature in blue ink, appearing to read "Farishta Ahrary".

City Auditor 08/15/2025

## Religious Accommodation Request Form

The City of Sacramento prohibits discrimination against employees and applicants for employment based on religious beliefs, practices, and affiliations. In addition, the City provides reasonable accommodation for an individual's sincerely held religious beliefs and practices unless providing a reasonable accommodation would result in undue hardship to the City.

Completed Religious Accommodation Request Forms must be submitted to the ADA and Leave Administration Office at [ADA@cityofsacramento.org](mailto:ADA@cityofsacramento.org).

EMPLOYEE INFORMATION			
Employee Name:		Job Title:	Employee ID:
Department:		Division:	Work Location:
Telephone #:	Email:	Supervisor Name:	
RELIGIOUS BELIEFS/PRACTICE/OBSERVATION NEEDING ACCOMMODATION			
Please specify the sincerely held religious belief, practice, or observance that is the basis for your request for accommodation.			
CONFLICTING WORK REQUIREMENTS			
Please specify the work requirement that conflicts with the religious belief, practice, or observance described above and explain the nature of the conflict.			
ACCOMMODATION(S) REQUESTED			
What is the accommodation or modification that you are requesting? Please include an explanation of how the requested accommodation(s) will enable you to meet your religious obligations without impacting your ability to perform the essential functions of your job.			
EMPLOYEE CERTIFICATION			
I certify that the above information is complete and accurate to the best of my knowledge, and I understand that my request for accommodation may not be granted if it is unreasonable or would impose an undue hardship.			
Employee Signature:			Date:

## Review of Religious Accommodation Request Form

This form is to be completed in full by the department and a member of the ADA and Leave Administration Office.

EMPLOYEE INFORMATION		
Employee Name:	Job Title:	Employee ID:
Department/Division Request Received By:		Date Request Received:
REQUEST REVIEW		
Describe the accommodation being requested:		
Indicate the essential functions of the job that are impacted:		
What steps were taken to determine the effectiveness and feasibility of the proposed accommodation(s)?		
REASONABLE ACCOMMODATION DETERMINATION		
Request for religious accommodation: <input type="checkbox"/> GRANTED <input type="checkbox"/> DENIED		
If granted, indicate what accommodation will be provided. If denied, explain the rationale for this decision:		
CERTIFICATION		
Accommodation Reviewed by (name):	Job Title:	
Department Head/Division Manager Signature:	Date:	