

# **Department of Energy**

Washington, DC 20585

July 17, 2024

#### MEMORANDUM FOR HEADS OF DEPARTMENTAL ELEMENTS

FROM: ERIN MOORE

CHIEF HUMAN CAPITAL OFFICER

SUBJECT: Policy Memorandum #134, Religious Accommodation

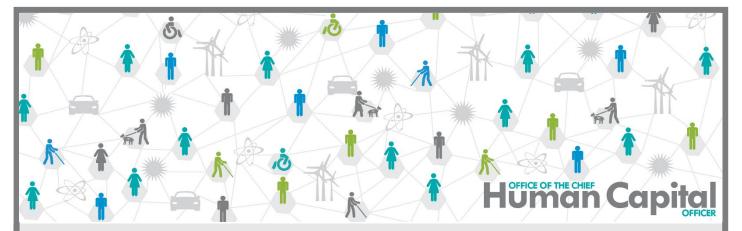
This policy memorandum (PM) establishes the Department of Energy's (DOE) procedures for responding to requests for Religious Accommodation (RA) based on Title VII of the Civil Rights Act of 1964.

PM #100C, Reasonable Accommodation and Personnel Assistance Services, dated July 17, 2024, was established as a separate PM for requesting Reasonable Accommodation for people with a disability. The issuance of this PM and PM #100C rescinds PM #100B, Reasonable Accommodation, dated February 14, 2022, which included both types of RA requests.

An electronic version, capable of being downloaded for printing, is available on <u>energy.gov</u> and <u>HCnet</u>. For additional accessible formats including all attachments, please contact <u>ReasonableAccommodationOPLER@hq.doe.gov</u>.

Questions concerning this PM should be directed to LesleyAnne Ezelle Reasonable Accommodation Program Manager, Office of Policy, Labor and Employee Relations (OPLER), at (202) 527-3703 or ReasonableAccommodationOPLER@hq.doe.gov.

Copy to: Directors of Servicing Human Resources Offices and Shared Service Centers



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# POLICY MEMORANDUM #134

RELIGIOUS ACCOMMODATION



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### **PURPOSE**

This policy memorandum (PM) establishes the Department of Energy's (DOE) procedures for processing requests for <u>religious accommodations</u> (RA) based on a sincerely held <u>religious belief</u>, as defined by Title VII of the Civil Rights Act of 1964.

PM #100C, Reasonable Accommodation and Personnel Assistance Services, dated July 15, 2024, was established as a separate PM for requesting Reasonable Accommodation for people with a disability.

### **CANCELLATIONS**

This PM replaces the following:

1) PM #100B, Reasonable Accommodation, dated February 14, 2022.

### **APPLICABILITY**

- 1) With the exception of the Exemptions/Equivalencies listed below, this PM applies to all DOE employees and applicants for employment with DOE. Contract workers should contact their employing company to initiate an RA request.
- 2) The Administrator of the National Nuclear Security Administration (NNSA) must ensure that NNSA employees comply with their responsibilities under this policy memorandum. Nothing in this policy memorandum will be construed to interfere with the NNSA Administrator's authority under section 3212(d) of Public Law (P.L.) 106 65 to establish Administration specific policies, unless disapproved by the Secretary.

# **EQUIVALENCIES/EXEMPTIONS**

1) Equivalency: In accordance with the responsibilities and authorities assigned by <u>Executive Order</u> (EO) 12344, codified at 50 U.S.C. § 2406 and 50 U.S.C. § 2511, and to ensure consistency through the joint Navy/DOE Nuclear Propulsion Program, the Deputy Administrator for Naval Reactors (Director) will implement and oversee requirements and practices pertaining to this PM for activities under the Director's cognizance, as deemed appropriate.

# **LABOR RELATIONS OBLIGATIONS**

- 1) Departmental Elements (DE) with employees covered by a collective bargaining agreement (CBA) must meet their labor obligations under the Federal Service Labor-Management Relations Statute if implementation of the policy impacts the conditions of employment of bargaining unit employees.
- 2) Nothing in this PM shall change any CBA in effect on the date of this PM unless the change is necessary to implement new Federal statute. In the event any provisions of this PM conflict with the terms of any CBA in effect on the date of this PM, the terms of the CBA shall prevail.
- 3) Consult with your Servicing Labor Relations Office to determine if collective bargaining obligations are required to be met prior to implementation.

### **BACKGROUND**

It is DOE's policy to provide a working environment that is respectful of the religious beliefs of its employees. DOE is committed to providing qualified employees and applicants with sincerely held religious beliefs, practices, or observances that conflict with work requirements an opportunity to access accommodations unless it would create an <u>undue hardship</u> in accordance with Title VII of the Civil Rights Act of 1964.

### **REQUIREMENTS**

# A. GENERAL REQUIREMENTS

- 1) DOE is required to provide an RA to an applicant or employee whose sincerely held religious beliefs, practices, or observances conflict with work requirements, unless the accommodation would create an undue hardship.
- Each employee or applicant requesting an RA receives an individual analysis and determination by the <u>Designated Management Official</u> (DMO), who is provided with advice and assistance by the assigned <u>Local Reasonable Accommodation Coordinator</u> (LRAC).
- 3) Generally, the DMO is normally the first-level Supervisor, and the second-level Supervisor is normally the Reconsideration DMO. However, there may be circumstances that require the appointment of DMOs or Reconsideration DMOs who are not the first-level or second-level supervisor or outside the Requestor's chain of command. The decision to appoint a DMO or Reconsideration DMO is at the discretion of the LRAC, in consultation with the Office of General Counsel (GC).
- 4) The applicable GC should be consulted throughout the RA process when necessary; in certain circumstances, GC consultation is mandatory as outlined in this PM.
- 5) The timeline for approving or denying an RA starts as soon as the RA is first requested. Absent any extenuating circumstances, all requests for RA will be processed within 30 days, or as expeditiously as the specific circumstances of the individual RA allows. Failure to process the request in the most expeditious manner possible may result in a violation of the Title VII of the Civil Rights Act 1964.

### B. REQUESTING AN RA

- 1) A DOE employee (herein referred to as "Requestor") may initiate a verbal or written RA request with their supervisor or their assigned LRAC at least 30 days (unless reasonably impractical) in advance of their need for the accommodation.
- 2) Although the initial request does not have to be made in any specific format, once the RA evaluation process commences, the Requestor will be required to use DOE's RA templates to help ensure expediency of processing and may be required to provide other documentation or information supporting the request.
  - a. Requestors do not need to include specific words such as "accommodation," or "religion" in their request; however, they must be able to identify their religious belief, describe, if applicable, the impact it has on performing the <u>essential functions</u> of their position, and specify the requested RA.

3) The RA process allows an applicant access to the application and hiring process; therefore, it is expected the accommodation shall be provided as soon as reasonably possible. An applicant (herein also referred to as "Requestor") may make a written or verbal request to either the Staffing Specialist or Hiring Manager at least 30 days (unless reasonably impractical) in advance of their need for the accommodation. <a href="Attachment 2">Attachment 2</a>, <a href="Religious Accommodation Process for Applicants">Religious Accommodation Process for Applicants</a> will be followed.

- 4) The recipient of the initial RA request, whether provided verbally or in writing, must forward the RA request to the LRAC within **2 business days**, absent unusual circumstances.
- 5) The LRAC will confirm receipt of the RA request in writing to the Requestor, copying the DMO. This is normally within **5 business days** of receipt, absent unusual circumstances thereby initiating or continuing the Interactive Process.
- 6) If a Requestor directly requests an RA from an office providing administrative services (e.g., Office of Management (MA), Office of Chief Information Officer [IM]) rather than through their chain of command, the receiving administrative office must contact the Requestor's Supervisor or LRAC within 2 business days to initiate the RA process.
- 7) If a request is submitted during the pendency of an administrative action (e.g., conduct or performance-based action), management must evaluate the RA request in conjunction with the administrative action on a case-by-case basis in consultation with their servicing Employee Relations (ER) Specialist.
  - a. While not required, a decision to temporarily suspend an administrative action until the RA process is complete is at the discretion of management and evaluated on a case-by-case basis in consultation with their servicing ER Specialist and GC.
  - Submitting a reasonable accommodation does not require management to tolerate or excuse poor performance or misconduct, withhold disciplinary action (including termination or removal) warranted by poor performance or misconduct, or raise a performance rating.

### **C. INTERACTIVE PROCESS**

- 1) DOE has an obligation to provide reasonable accommodations that affords applicants and employees an opportunity to practice their sincerely held religious beliefs or observations unless to do so would create an undue hardship. If more than one equally <a href="effective accommodation">effective accommodation</a> is identified, the DMO will select the accommodation determined to best fit the needs of the employee and the work environment.
- 2) The interactive process requires DOE to fully explore the RA request as well as the impacts, needs, and feasibility of the request.
  - a. The interactive process will be led by the LRAC and will include the Requestor and DMO. The LRAC will engage GC as appropriate or necessary. In certain circumstances, GC consultation is mandatory.
  - b. The interactive process requires participation, open communication, and ongoing dialogue between the Requestor, LRAC, DMO and other appropriate parties.
- 3) If the request includes a modification to the work environment or a work schedule, the LRAC will issue the Essential Functions Worksheet to the DMO, which must be completed and returned to the LRAC within **5 business days** from receipt (please see Template B Essential Functions). The

- first-level Supervisor may be required to provide the essential functions even if they are not serving as the DMO.
- 4) The LRAC may need to ask the Requestor relevant questions, including but not limited to:
  - a. What is the religious nature of the belief, observance, or practice at issue?
  - b. What change or adjustment to the work requirement do you need to be able to observe or practice your religion?
- 5) The DMO and the LRAC will evaluate whether the Requestor can perform the essential functions of the position with the requested accommodation. The LRAC will provide guidance to assist the DMO in deciding on the request, drafting a response for the DMO to issue to the Requestor, and obtaining GC's concurrence on the response, as required.
- 6) If the Requestor does not respond to the LRAC's request to engage in the interactive process, and/or provide administratively acceptable documentation within the timeline specified the RA case will be administratively closed (please see <a href="Template E Administrative Closure of Religious Accommodation">Template E Administrative Closure of Religious Accommodation</a>).

# **D. RESOLVING RA REQUESTS**

- 1) All decisions regarding RA requests (i.e., to either provide the RA request or deny the RA request) will be communicated to the Requestor in writing within 30 calendar days of the initial request (please see <u>Template C Religious Accommodation Determination</u>).
  - a. When extenuating circumstances are present (e.g., events that are not reasonably foreseeable or avoidable, or are beyond the Requestor's or DOE's ability to control), the time for processing the request and providing the accommodation will be extended by the LRAC as reasonably necessary.
  - b. The LRAC must notify the Requestor in writing of the reason for any delay in processing the request or providing RA, as well as the conditions needed to move forward and the anticipated date to move forward.
- 2) It is expected the DMO will issue a decision and provide an effective accommodation in a much shorter timeframe with a simple or less complex request, or a request that requires prompt action.
- 3) The DMO has the discretion to choose the accommodation when more than one effective accommodation is identified.
- 4) If the DMO grants the RA request, the LRAC will discuss the implementation of the accommodation with the Requestor.
  - a. The DMO has the discretion to choose the accommodation when more than one effective accommodation is identified. The DMO's granting of an alternative accommodation will be considered a decision to grant the accommodation.
  - b. If the Requestor believes an alternate accommodation is not effective, the Requestor may seek review under the options in <u>Reconsideration and Appeals Process</u> in Section E.
- 5) If the DMO denies a request for accommodation, the written decision will clearly state the specific reason(s) for the denial and provide notice of appeal rights, including the right to file an

Equal Employment Opportunity (EEO) complaint and invoke other statutory processes, as appropriate (please see <u>Template D – Denial of Religious Accommodation</u>).

- 6) Reasons an RA request may be denied include, but are not limited to:
  - a. Remove an essential function of the job;
  - b. Not be effective; or
  - c. Result in undue hardship or a direct threat
- 7) Initial undue hardship determinations must be made by the LRAC, based on input from the DMO and possibly the Requestor's chain of command. Factors that must considered in assessing undue hardship include:
  - a. The nature and net cost of the accommodation;
  - DOE's overall size, number of employees, and financial resources. Costs to be considered include not only direct monetary costs but also the burden on the conduct of the Department's business and mission;
  - c. The type of operation and the impact of the accommodation upon the operation;
  - d. The Department's ability to conduct business; and
  - e. The impact of the accommodation on DOE operations and facilities.
- 8) Factors the DMO must consider in assessing a direct threat include:
  - a. The duration of the risk;
  - b. The nature and severity of the potential harm;
  - c. The likelihood that the potential harm will occur; and
  - d. The imminence of the potential harm.
- Before the DMO can officially issue a denial for an accommodation request, the LRAC must submit the draft denial and consult with and obtain GC concurrence in any denial of an RA Request.

### E. RECONSIDERATION AND APPEALS PROCESS

- 1) If a request for RA is denied, or the Requestor believes the alternate accommodation offered is not effective, the Requestor may submit a request for reconsideration.
- 2) A request for reconsideration must be submitted in writing, to the LRAC within **5 business days** of the Requestor's receipt of the RA determination. Requestors have the right to request reconsideration of a denial of the requested accommodation or the alternative accommodation offered by the DMO.
- 3) The Reconsideration DMO decision is the final step in the formal RA process and procedure.
- 4) Within **2 business days** of receiving the request for reconsideration, the LRAC will contact the second-line Supervisor of the Requestor, or a higher-level official in the chain of command of the DMO to serve as the <u>Reconsideration DMO</u> and provide a reconsideration decision. There may be circumstances that require the appointment of Reconsideration DMO outside of the chain of command. It is at the discretion of the LRAC, with consultation from GC, to appoint an independent Reconsideration DMO.

- 5) The LRAC will provide the following documents to the Reconsideration DMO:
  - a. Reconsideration request;
  - b. Original request; and
  - c. Supporting documentation, such as essential functions assessment, the Requestor submitted documents, etc.
- 6) Within **3 business days** of receiving the request for reconsideration, the LRAC will schedule a meeting with the Requestor, the DMO, and the Reconsideration DMO to discuss the basis for the reconsideration request and review the documents to be considered.
- 7) The Reconsideration DMO has **10 business days** from receipt of the request, to issue a decision to the Requestor.
  - a. The Reconsideration DMO will review the documents and any new information, in consultation with the LRAC, and obtain GC concurrence prior to issuing the reconsideration decision.
  - b. The LRAC will draft the written decision for the Reconsideration DMO to issue to the Requestor.
  - c. Reconsideration decisions that partially modify the original determination must thoroughly address the overall final determination.
- 8) To file an EEO complaint for religious discrimination based on a denial of a requested RA, or based on any of the other protected classes, an employee or applicant must contact the EEO Office within **45 calendar days** of the receipt of the denial, pursuant to 29 CFR Part 1614.
- 9) Depending on the applicable CBA, bargaining unit employees may be able to file a negotiated grievance.

### F. CONFIDENTIALITY AND TRACKING REQUIREMENTS

- 1) All aspects of the RA process must be kept confidential. This includes the initial request, the decision, and any documentation obtained during the process. The act of requesting an accommodation is considered a protected activity and should not be disclosed except to those with a need to know.
- 2) Documents will be collected and maintained under the relevant Privacy Act System of Records. Documents associated with RA are stored in a confidential RA file. Supervisors are specifically prohibited from storing RA related documents in any employee file.
- 3) Documents associated with religious accommodation requests are stored in a confidential file maintained by the GC.
- 4) Those who obtain or receive such information as part of the accommodation process are strictly bound by confidentiality requirements.
- 5) LRACs are responsible for tracking and retaining records related to anyone who has requested an RA.
  - a. LRACs will create and track all RA cases in the designated system of record: the Labor Management Employee Relation Case Management System (LMER CMS) or the Human Resources Management Information System (HRMIS), or successor systems.

- b. These records must include details about each request for RA, including at a minimum:
  - i. Requestor's name and position related information such as, DE, office, position title (official and working title), occupational series, grade level, etc.
  - ii. The specific RA requested;
  - iii. Whether the accommodation was needed to apply for a job, perform the essential functions of a job, or enjoy the benefits and privileges of employment;
  - iv. Whether the request was granted (which may include an accommodation different from the one requested) or denied;
  - v. If denied, the basis for such denial;
  - vi. The names DMO and Reconsideration DMO, if applicable; and
  - vii. The number of days taken to process the request.
- 6) Documentation associated with the accommodation requests should be destroyed:
  - a. Upon the Requestor's departure from the Department;
  - b. In accordance with timeframes established by the General Records Schedule; or
  - c. In accordance with legal hold timelines if there is a pending third-party case.

# **ROLES AND RESPONSIBILITIES**

### A. REQUESTOR WILL:

- 1) Submit requests for RA to their LRAC, their first level Supervisor or the Staffing Specialist or Hiring Manager if the Requestor is an applicant;
- 2) Adhere to the timelines outlined in this PM to the extent practicable absent extenuating circumstances; and
- 3) Actively participate in the interactive process with the DMO and LRAC to determine an appropriate accommodation.

### **B. LOCAL REASONABLE ACCOMMODATION COORDINATORS WILL:**

- 1) Advise and guide applicants, Requestors, DMOs, Reconsideration DMOs, Supervisors/Managers, and other employees on their responsibilities under this PM;
- 2) Consult with the applicable GC for guidance and concurrence when necessary (e.g., on denials or direct threat decisions);
- Ensure timely processing and tracking of RA requests;
- 4) Adhere to the timeframes outlined in the PM to the extent practicable absent extenuating circumstances;
- 5) Accurately document the timeline of cases, including when processing is paused and reasons for any extended delays in processing the request;
- 6) Provide administrative support, including drafting responses, to DMOs and Reconsideration DMOs;

- 7) Process and facilitate reconsideration requests;
- 8) Train and brief Supervisors/Managers and employees on the RA process and procedures, as requested;
- 9) Maintain RA cases in the LMER CMS or HRMIS, or successor systems, in accordance with the requirements of this PM; and
- 10) Maintain tracking data for reporting requirements. LRACs must use the numbered list style to ensure that specific requirements are easy to reference.

# C. REASONABLE ACCOMMODATION PROGRAM MANAGER WILL:

- 1) Maintain this PM in accordance with applicable regulations and best practices and ensure the proper implementation of this PM;
- 2) Respond to technical questions regarding this PM and serves as the DOE subject matter expert on Religious Accommodation;
- 3) Provide technical assistance on proposed RA denials based on undue hardship and direct threat;
- 4) Cooperate with Office of Energy Justice and Equity (EJE) in their audit of the RA Program;
- 5) Collect and interpret RA data;
- 6) Disseminate RA information online to applicants, employees, and Supervisors;
- 7) Design and deliver RA training and training products for employees and Supervisors;
- 8) Maintain a current <u>list of LRACs</u> on <u>energy.gov</u>;
- 9) Facilitate training for LRACs to deliver to their servicing area;
- 10) Manage the LRAC Community of Practice Quarterly Meetings; and
- 11) Respond to RA related data calls.

# D. FIRST-LEVEL SUPERVISORS/MANAGERS/HIRING MANAGERS WILL:

- 1) Typically, serve as the DMO for RA requests;
- 2) Forward all RA requests to the LRAC within **2 business days** of receipt;
- 3) Complete Essential Function Worksheet within 5 business days;
- 4) Actively and promptly participate in the interactive process, along with the LRAC and the Requestor, to determine the appropriate accommodation;
- 5) Adhere to the timeframes outlined in the PM to the extent practicable absent extenuating circumstances;
- 6) Issue the RA decision to the Requestor;
- 7) Receive the Requestor's response and forward it to the LRAC; and
- 8) Timely engage the servicing Employee Relations Specialist to address any next steps if an accommodation is denied.

# E. SECOND-LEVEL SUPERVISORS/MANAGERS WILL:

- 1) Typically, serve as the Reconsideration DMO for denials of requests for RA;
- 2) Review all RA case documentation in accordance with this PM;
- 3) Actively and promptly participate in the interactive process, along with the LRAC and the Requestor, to determine the appropriate accommodation;
- 4) Adhere to the timeframes outlined in the PM to the extent practicable absent extenuating circumstances; and
- 5) Issue a reconsideration decision, after consultation with the LRAC and GC, within **10 business** days of receipt of the request for reconsideration.

### F. OFFICE OF THE GENERAL COUNSEL WILL:

- Provide legal advice and guidance on the RA process, including on RA denials, to the LRAC, DMO, and Reconsideration DMO, as required by the PM and as needed based on the specific circumstances of the request; and
- 2) Provide legal analysis for undue hardship cases and direct threat cases to ensure the proposed decision is legally compliant.

### G. OFFICE OF ENERGY JUSTICE AND EQUITY WILL:

- 1) Conduct audits of the RA Program;
- 2) Recommend changes to the RA Program for OPLER consideration;
- 3) Independently prepare and respond to EEOC RA reporting requirements, such as the MD-715 Report, data calls, etc., based on data provided by OPLER; and
- 4) Request and gather data from OPLER for miscellaneous data calls and reports to provide to the requesting agency.

# **ADDITIONAL INFORMATION**

Questions concerning this PM should be directed to the Reasonable Accommodation Program Manager in at ReasonableAccommodationOPLER@hq.doe.gov.

### REFERENCES

- 1) 5 CFR Part 550, Subpart J Compensatory Time Off for Religious Observances
- 2) Administrative Leave Act of 2016 (5 USC 6329a)
- 3) <u>EEOC Management Directive 715 (EEO MD-715)</u>, dated October 2003
- 4) Privacy Act of 1974
- 5) Title VII of the Civil Rights Act of 1964

# **LIST OF TEMPLATES**

All the templates listed below are available on the Policy Memorandum #134 page on HCnet.

- 1) Template A Request for Religious Accommodation
- 2) Template B Essential Functions
- 3) Template C Religious Accommodation Determination
- 4) Template D Denial of Religious Accommodation
- 5) Template E Administrative Closure of Religious Accommodation

# **LIST OF ATTACHMENTS**

- 1) Key Terms and Definitions
- 2) Religious Accommodation Process for Applicants

# **ATTACHMENT 1: KEY TERMS AND DEFINITIONS**

# **DESIGNATED MANAGEMENT OFFICIAL (DMO)**

The person or designee who has the authority to decide whether the requested RA will be provided, and if so, the nature of the accommodation. The DMO is normally the Requestor's first level Supervisor (or Manager); however, another management official with an understanding of the essential functions of the position may also serve in this capacity. The LRAC, with concurrence from GC, will decide on the need to appoint an alternate official. If the first-level Supervisor is not the DMO, the first level supervisor must still complete essential functions worksheet within 5 business days.

### **DIRECT THREAT**

A significant risk of substantial harm to the health or safety of the individual or others that cannot be eliminated or reduced by an accommodation or modification to a job.

#### **EFFECTIVE ACCOMMODATION**

An accommodation that removes a workplace barrier and provides an individual with an equal opportunity to apply for a position, the ability to perform the essential functions of a position or gain equal access to a benefit or privilege of employment (e.g., employer-sponsored training, employee assistance programs, credit unions, cafeterias, lounges, gymnasiums, auditoriums, transportation, and parties or other social functions).

#### **ESSENTIAL FUNCTIONS**

The fundamental job duties of the position the individual holds or wants to hold, which do not include marginal functions. The individual must be able to perform the essential functions, with or without an accommodation, to be considered qualified for the position.

# LOCAL REASONABLE ACCOMMODATION COORDINATOR (LRAC)

The principal advisor to management and employees within their assigned organization. The LRAC assists applicants, Requestors, DMOs, and Reconsideration DMOs with RA processing requests, interpreting regulations and statutes, reviewing existing policies and procedures, having interactive discussions, recommending appropriate decisions, drafting responses, and coordinating required reviews in accordance with the requirements of this PM.

#### **RECONSIDERATION DMO**

Typically, the second-line Supervisor of the Requestor, or a higher-level Management Official in the chain of command of the DMO, who provides a reconsideration decision of accommodation denials. There may be circumstances that require the appointment of Reconsideration DMO outside of the chain of command. It is at the discretion of the LRAC, with consultation from GC, to appoint an independent Reconsideration DMO.

#### **RELIGIOUS ACCOMMODATION**

An adjustment to the work environment allowing employees to observe their religious beliefs.

### **RELIGIOUS BELIEF OR PRACTICE**

A belief or practice that is sincerely held with the strength of traditional religious views, including moral or ethical beliefs as to what is right and wrong. Social political, or economic philosophies, as well as mere personal preferences, are not religious beliefs or practices.

### **UNDUE HARDSHIP**

An action requiring significant difficulty or expense when the following factors are considered: nature and cost of the accommodation in relation to the size, resources, nature, operation, and structure of DOE in its entirety.

### **ATTACHMENT 2: RELIGIOUS ACCOMMODATION PROCESS FOR APPLICANTS**

1) An applicant with a <u>religious belief or practice</u>, like all other applicants, must be able to meet DOE's requirements for the position, such as education, training, employment experience, skills, or licenses. DOE cannot refuse to consider an applicant because the individual requires an RA to compete for or perform a job.

- 2) DOE's public website, <u>energy.gov</u>, provides applicants the RA procedures and applicable templates.
- 3) Applicants requiring an RA for any part of the application process should contact the SHRO/SSC point of contact (POC) listed in the Job Opportunity Announcement (JOA) and inform the POC that a change or adjustment to the application/interview process is being requested due to a religious belief or practice.
- 4) The SHRO/SSC POC must contact the LRAC who will work with them to ensure the services and support requested are assessed and provided, as appropriate, in a timely manner.
- 5) Applicant requests for RA should be processed promptly, no later than **5 business days** from the date of the initial request.
- 6) The LRAC will also provide guidance and assistance to Hiring Managers who have applicants needing <u>religious accommodation</u> to participate in the interview process.
- 7) Each request for RA receives an individual analysis/determination by the Hiring Manager and LRAC.