

Faith actors, COVID-19 vaccine mandates, and religious exemption claims.

Navigating minority rights in US workplaces

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Abstract

This study analyzes how US workplace COVID-19 vaccine mandates affected the governance of religious diversity, focusing on requests for religious exemptions by minority faith groups. It finds that vaccine mandates highlighted tensions between public-health goals and religious freedom, particularly for minority religions. The Supreme Court, in *Groff v. Dejoy*, strengthened accommodation standards by requiring employers to demonstrate a substantial burden before denying religious exemptions. Religious leaders and faith-based actors shaped legal reasoning and facilitated dialogue between employers and employees. Interactive workplace procedures, such as mediation by chaplains or faith actors, could provide fair and culturally sensitive approaches to religious accommodation.

Keywords

Faith actors, COVID-19 vaccine mandates, religious exemption claims, minority rights, US workplaces.

1. Introduction

Beginning on 30 January 2020, when the World Health Organization declared COVID-19 a public-health emergency of international concern, the pandemic profoundly affected health systems, economies, and social life. With the development of vaccines, governments and institutions introduced policies to curb infection,

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promote herd immunity, and restore normal social and economic activity (Silverman 2020). In the United States, many employers adopted vaccination mandates for employees, either in response to federal, state, or local requirements or through their own internal policies (Rothstein 2022:8). These mandates generated substantial public and legal debate, particularly when employees sought religious exemptions and employers failed to accommodate them. As a result, litigation increased and renewed attention was drawn to the scope and limits of religious accommodation in the workplace (Barker 2020; Madera 2023:129).

At the same time, US workplaces have become increasingly religiously diverse, yet accommodating religious expression remains challenging in practice (Flake 2019:72). Some scholars argue that mainstream religions, particularly Christianity, are more easily integrated into workplace routines – for example, through recognition of major holidays (Miller 2021:2328; Zaheer 2007:498). Nevertheless, even Christian employees may hesitate to express their faith openly at work (Pearn Kendola 2023). Employees belonging to minority or less familiar religious traditions often face additional barriers, not only because their beliefs are less widely understood but also due to organizational policies, limited awareness, and implicit biases (Flake 2025:337; Flake 2019:72; Miller 2021:2328). Historically, courts have interpreted the “undue hardship” standard in ways that frequently required employees to choose between their religious commitments and their jobs, a dynamic that disproportionately affected minority faiths (Brierton 2002:174; Dhillon 2011:214).²

The COVID-19 vaccination mandates intensified these preexisting tensions. They produced a surge in requests for religious exemptions and exposed the limitations of traditional accommodation frameworks (Kaminer 2015:119). Employees from various religious backgrounds, including Christians, invoked faith-based objections to vaccination, while others combined religious reasoning with ethical or safety concerns. Although minority religions often faced particular difficulties in explaining and securing accommodations (Miller 2021:2328; Brierton 2002:174), conflicts arose across a broad range of beliefs. Meanwhile, recent US Supreme Court jurisprudence has shifted toward stronger protections for religious employees, overturning earlier “employer-friendly” interpretations (Dhillon 2011:214). In some cases, juries have awarded significant damages to workers whose exemption requests were denied, and pre-litigation settlements have led to policy revisions and financial compensation (Tyler 2024).³

² *Groff v. DeJoy*, 600 US 447 (2023).

³ *EEOC v. Hank's Furniture, Inc.* See also the Infinity Rehab settlement, available at <https://tinyurl.com/548yh7u>, and the Mercy Health settlement with its employees who claimed for a religious discrimination, available at <https://mercyhealthsettlement.com/>.

2. Overview of this article

This paper examines how faith actors – clergy, religious leaders, faith-based organizations, and related networks – can mediate conflicts between religious employees and employers over COVID-19 vaccination mandates, and what this reveals about governing religious diversity in US workplaces. It treats US vaccine mandates as a stress test for the fragmented legal framework on employment and religious accommodation, highlighting regulatory choices, increased litigation, and limits of standards such as the “undue hardship” test, as well as the shift marked by *Groff v. DeJoy*.

Against this background, the paper analyzes how faith actors acted as intermediaries during the vaccination debate. It distinguishes reactive strategies (e.g., third-party briefs influencing courts) from proactive ones (e.g., involving chaplains in review committees), arguing that proactive approaches can move beyond adversarial rights-based frameworks toward cooperative management of religious diversity during public-health crises (Salter and Wilkinson 2022:104).

Using vaccination mandates as a lens for broader workplace governance, the article shows how legal rules, organizational policies, and faith actors can interact to reduce tensions and identify compromise solutions. The experience of immunization highlights a “spectrum” of cooperation – from consultation to partnerships – between public authorities and social actors – in achieving public-health goals (Madera 2023:183; Gilmore et al. 2020:7; Santibañez 2019:5274-5276). It asks whether “two-way dialogue”, which can often bridge secular and religious narratives, could also depolarize employer-employee conflicts in workplaces (Gilmore et al. 2020:7; Tiwana and Smith 2024).

The paper proceeds by examining religious vaccine hesitancy, the US regulatory and judicial landscape (including pre- and post-*Groff v. DeJoy* developments), the role of faith actors, implications for workplace diversity governance, and the potential contribution of chaplains in accommodation procedures, before concluding.

3. Religious hesitancy toward vaccination

In the US, COVID-19 vaccination requirements introduced to limit the spread of the virus sparked intense debate. Although no nationwide mandate existed, a combination of state and local rules, together with company policies, restricted access to certain workplaces, services, and public spaces for unvaccinated individuals. Misinformation about the new vaccines, the presence of established anti-vaccine movements, distrust of public-health authorities, conspiracy theories, and political polarization contributed to resistance among significant segments of the population (Rothstein et al. 2021:1061). A key tension emerged between pub-

lic-health goals and the US ethical framework, which traditionally emphasizes individual fundamental rights (Wirpsa et al. 2023:1-9).

Although mainstream religions supported COVID-19 vaccination and cooperated in vaccination campaigns, faith-based hesitancy increased (Carmody et al. 2021:1167). Employees often invoked religious doctrines, values, or tenets to justify requests for exemptions. Scholars have categorized the multiple reasons underlying religiously based resistance to vaccination (Lo Giacco 2020, 44-49; Transgerud 2023:2-5). Some religious communities have historically expressed skepticism toward vaccines (Grabenstein 2013:2011-2013). Courts also faced claims based on “sincerely held beliefs” without clear links to specific doctrines, reflecting individualized interpretations of religious teachings (Movsesian 2023:543).⁴ In many cases, attitudes toward vaccination reflected a complex interplay of social, political, economic, and religious factors (Peterson et al. 2022:947; Tiwana and Smith 2024). Among US minorities, hesitancy was often connected to distrust toward employers, government institutions, and the healthcare system, partly rooted in historical experiences (Peterson et al. 2022:948).

During the pandemic, some observers viewed religiously based vaccine hesitancy as a pretext to avoid vaccination (Nortey 2022). Health experts warned of the misuse of religious exemptions, noting that most mainstream religions – including the Catholic Church, Evangelical Christianity, various Protestant denominations, Judaism, and Islam – did not oppose vaccines (Giubilini et al. 2021:5). Some scholars also linked vaccine refusal to broader ideological currents such as Christian nationalism (Flescher 2023:576; Medda-Windischer et al. 2025:185-249). Employers, meanwhile, had strong economic incentives to ensure vaccination so that they could resume business activities disrupted by restrictive measures (Baxter 2017:886).

This environment sometimes disadvantaged employees with sincerely held beliefs who were denied exemptions and dismissed during the health crisis. Members of religious minorities also faced difficulties requesting exemptions because of “cultural-religious barriers,” while employers often struggled to understand employees’ cultural and religious backgrounds (Lee 2024:247).

4. The US’s fragmented policies to vaccination

Following the COVID-19 vaccine rollout, US policies were fragmented. Although the federal government issued initial guidance on workplace vaccine mandates in December 2020, federal employees and contractors were not required to vaccinate until November 2021; enforcement by the Department of Health and Human

4 See *Kane v. City of New York* (Sup. Ct., cert. filed 21 July 2025); *Barnett v. Inova Health Care Services*, No. 24-1271 (4th Cir. 2025).

Services (HHS) and the Occupational Safety and Health Administration (OSHA) soon triggered litigation (Bisom-Rapp and Peruzzi 2024:220). Private employers, relying on the “employment-at-will” rule, often imposed mandates earlier (Bisom-Rapp and Peruzzi 2024:220).

The Equal Employment Opportunity Commission (EEOC), which enforces Title VII of the Civil Rights Act, issued guidance urging employers to accommodate religious objections. Its 2009 H1N1 guidance required accommodations unless they imposed an “undue hardship,” taking into account public risk, infection-control alternatives, and the number of requests (EEOC 2009). During health crises, particularly in healthcare, this standard was applied leniently (Madera 2021).⁵ Updated COVID-19 guidance (2021-2022) clarified that if vaccination is impossible due to a disability or sincerely held religious belief and no accommodation is feasible, dismissal may be lawful (EEOC 2022).

How one defines religion is a key issue here. Title VII covers all aspects of religious practice or belief, including non-theistic, minority, unconventional, or moral-ethical beliefs, without requiring formal affiliation.⁶ The Supreme Court has avoided a clear definition, leaving lower courts to adopt divergent approaches. As a result, some have recognized vegan-based objections as plausibly religious,⁷ while others rejected purely philosophical claims as not addressing “ultimate ideas” of life and purpose (Madera 2018:549).⁸

Sincerity is also central. Employers usually presume sincerity but may request clarification when doubts arise (Reiss and Dubal 2018:756-762; Rothstein 2022:9). The EEOC allows such inquiry when there is “an objective basis for questioning” the claim, though scholars warn that this standard is “unpredictable” and may disadvantage minority faiths (Doty and Chopko 2022:617; Gostin and Reiss 2025:1-3).

Although the EEOC should play a key role in litigation over healthcare vaccine mandates, it has often failed to counterbalance courts’ employer-friendly approach (Gostin and Reiss 2025:1-3).⁹ The Supreme Court interprets “undue hardship” as any cost exceeding the *de minimis* level and emphasizes burdens on third parties.¹⁰ Moreover, “reasonableness” does not require adopting the employee’s preferred accommodation (Flake 2020:1688). Consequently, employers often prevailed by offering alternative accommodations, even when they did not meaningfully engage with employees’ religious concerns (Opel et al. 2018:787; Reiss and Dubal 2018:756-762).

5 *Robinson v. Children’s Hospital Boston*, no. 14–10263 (D. Mass.2014).

6 *Wright v. Honeywell International, Inc.*, (5th Cir., 5 Aug 2025).

7 *Chenzira v. Cincinnati Children’s Hospital*, S.D. Ohio, No. 1:11-cv-00917, (27 Dec 2012).

8 *Fallon v. Mercy Catholic Medical Center*, 877 F.3d 487 (3rd Cir. 2017). See also *Domski v. Blue Cross Blue Shield of Michigan*, No. 2:2023cv12023 (E.D. Mich. 2024).

9 *EEOC v. Mission Hospital*, No. 1:16-CV-00118 (W.D.N.C.2016).

10 *EEOC v. Abercrombie & Fitch Stores, Inc.*, 575 US 768 (2015).

5. The fluctuating judicial approach toward state mandates and its implications for the workplace setting

During the COVID-19 pandemic, courts upheld state vaccination mandates for certain workers by relying on *Jacobson v. Massachusetts*.¹¹ The Supreme Court held in *Jacobson* that individual liberties may be limited during serious public-health emergencies to protect the community. The decision established that the Constitution does not guarantee absolute freedom under the Fourteenth Amendment to the US Constitution, allowing states to require vaccination despite personal objections (Miller 2021:2310; Rothstein 2022:9).

During COVID-19, states amended laws to increase safety in high-risk environments such as schools and healthcare facilities. Requirements differed by vaccine, employee category, and exemption policies, though the strictest rules applied in healthcare because of the need to protect vulnerable patients (Baxter 2017:899). Although *Jacobson* predates the Supreme Court's incorporation of the Free Exercise Clause to the states, courts revived the precedent in 2021 to support mandates, emphasizing deference to government public-health decisions and limiting exemptions that might weaken collective protection (Madera 2023).¹²

At the same time, Supreme Court jurisprudence has increasingly favored religious claims, challenging the *Employment Division v. Smith* standard¹³ and stressing that religious exemptions should not receive less favorable treatment than comparable secular exceptions (Reinbold 2022:562).¹⁴ This shift raises questions for private employers about whether religious exemptions must be granted whenever medical ones exist. Several courts and justices have expressed concern about limited religious accommodations,¹⁵ and some rulings have found that denying them may violate employee rights (Gostin and Reiss 2025:1-3; Parmet-Khalik 2023:280-287).¹⁶

These legal trends have influenced legislation restoring religious or philosophical exemptions,¹⁷ sometimes reducing vaccination coverage and herd immunity (Gostin and Reiss 2025:1-3; Madera 2023:139-144). In addition, political changes – such as shifts in federal advisory bodies, funding cuts for

¹¹ *Jacobson v. Massachusetts*, 191 US 11 (1905).

¹² *We the Patriots USA, Inc. v. Conn. Office of Early Childhood Dev.*, No. 3:21cv597, 2022 WL 105191 (D. Conn. 11 Jan. 2022); *Doe v. Mills*, 16 F.4th 20 (2021).

¹³ *Employment Division v. Smith*, 494 US 872 (1990). The Supreme Court ruled that the First Amendment does not allow people to ignore neutral, generally applicable laws, even if those laws unintentionally restrict religious practices. In this ruling, it moved away from the “strict scrutiny” standard used in earlier cases such as *Sherbert v. Verner* (1963).

¹⁴ *Tandon v. Newsom*, 593 US 61 (2021); *Roman Catholic Diocese v. Cuomo*, 592 U.S. 14 (2020).

¹⁵ *Lowe v. Mills*, No. 22-1710 (1st Cir. 2023).

¹⁶ *US Navy Seals 1-26 v. Biden*, 72 F.4th 666, 672 (5th Cir. 2023).

¹⁷ *Bosarge v. Edney*, No. 1:2022cv00233, Document 77 (S.D. Miss. 2023).

immunization programs, altered recommendation processes, and canceled vaccine-development support – have raised public-health concerns and contributed to declining trust in vaccines (Gostin and Reiss 2025:1-3).

6. Judicial discourse before and after *Groff v. DeJoy*

During the COVID-19 pandemic, vaccine mandates led to extensive litigation over religious discrimination and accommodation claims. Most courts rejected these claims, emphasizing a strict interpretation of undue hardship, deference to employers' reasons, and limited consideration of less restrictive public-health alternatives (Mello and Parmet 2023:1-3). In severe health crises, granting religious exemptions was typically seen as an undue hardship on employers, since it could heighten infection risk and harm third parties (Baxter 2017:904).

In 2023, the Supreme Court in *Groff v. DeJoy* revised the standard for religious accommodations at work. The case involved an evangelical Christian postal worker seeking exemption from Sunday work. The court ruled that employers must accommodate religious claims unless doing so causes a “substantial” burden on the business, requiring evidence of significant cost or operational impact and consideration of factors such as the business’s “nature, size, and operating costs” (Davis 2024).¹⁸ Scholars note that *Groff* will likely prompt a case-by-case reassessment of workplace duties and risks, with employers obliged to consider feasible, less burdensome alternatives even if they need not accept the employee’s proposed accommodation (Nelson 2025:1929-1952; Rothstein et al. 2021:1062).

In the context of mandatory vaccination, accommodations may include masking, social distancing, testing, workspace modifications, telework, or reassignment, with attention to vulnerable populations and sanitation requirements (Mello and Parmet 2023:1-3). Employers facing litigation should document accommodation efforts and may consult third parties to reduce liability (Rothstein 2022:9). Effective accommodations rely on mutual cooperation and flexibility, striving for “proportionate” compromise (Nelson 2025:1952).

Scholars observe that growing religious diversity complicates the judicial approach to accommodations. The strict standard established in *Groff* makes refusals harder, prompting employers to more closely examine the sincerity of beliefs, which may disproportionately burden lesser-known or nontraditional religions (Flake 2025:343). Recently, the Second Circuit clarified that courts must assess whether religious beliefs are “sincerely held” in employee exemption

¹⁸ *Groff v. DeJoy*, 600 US 447 (2023).

requests,¹⁹ reinforcing that employers must evaluate accommodations individually and in good faith, without relying on stereotypes or speculation (Goodman 2025).²⁰

Some scholars suggest that *Groff* signals a shift in reasonable accommodation, reducing preference for mainstream Christian practices and empowering marginalized religious minorities (May 2024:889). The decision stresses safeguarding faith communities' "internal frameworks" and connecting accommodation requests to authentic religious affiliation so as to filter out insincere claims (Greenawalt 2006:326; May 2024:890).

In *Groff v. DeJoy*, an unusually large number of amicus curiae briefs supported the petitioner, representing diverse faith groups – Sikh, Muslim, Hindu, Jewish, and Seventh-day Adventist – and thereby highlighting the case's importance for religious minorities and workplace accommodation law (May 2024:889).²¹ These briefs urged the court to overturn the "more than minimal" standard, arguing that it disproportionately harmed religious minorities, weakened Title VII protections, and allowed employers to deny accommodations over trivial costs. They advocated restoring the textual meaning of "undue hardship," emphasizing that it should require objective evidence of substantial difficulty or expense, not mere inconvenience.

The Muslim Public Affairs Council argued that the *de minimis* standard contributed to a hostile work environment for Muslims and other religious minorities by framing their practices as marginal and incompatible with mainstream (often Christian-oriented) workplace norms. Faith minorities, who are more often requesting accommodations, face "physical, psychological, and financial

19 *Gardner-Alfred v. Federal Reserve Bank of New York*, 143 F.4th 51 (2d Cir. 2025). The Second Circuit upheld sanctions against the plaintiffs and dismissed Gardner-Alfred's claims due to lack of evidence of sincere religious belief. However, it vacated summary judgment for Diaz, finding genuine factual disputes about the sincerity of her beliefs and whether they conflicted with the vaccination policy. The court clarified that sincerity cannot be dismissed simply because a plaintiff has secular objections, acts imperfectly, or misunderstands the vaccines' development process. After being fired from the Federal Reserve Bank of New York in early 2022 for declining a COVID-19 vaccination, Diaz – a Catholic co-plaintiff – challenged the mandate on the grounds that it conflicted with her faith. Her legal battle, which stalled when a district court dismissed the case, gained fresh momentum in 2025 after the Second Circuit's 2025 decision officially revived her legal challenge.

20 *Keene v. City and County of San Francisco*, No. 22-16567 (9th Cir. 2024); *Bube v. Aspirus Hospital, Inc.*, No. 22-cv-745 (W.D. Wis. 2024).

21 According to the Scotusblog report, briefs in support of the petitioner were filed by the Sikh Coalition (22/09/2022; 28/02/2023); the National Jewish Commission on Law and Public Policy (23/09/2022); General Conference of the Seventh-Day Adventists and Union of Orthodox Jewish Congregations of America (26/09/2022); the Thomas More Society and The Jewish Coalition for Religious Liberty (26/09/2022; 28/02/2023); Robert P. Roesser and the Christian Legal Society (26/09/2022); the Council on American-Islamic Relations (23/02/2023); the American Hindu Coalition (28/02/2023); the Seventh-Day Adventist Church in Canada, the Atlantic Union Conference of Seventh-Day Adventists, the North Pacific Union of Seventh-Day Adventist, and the National Council of Young Israel (28/02/2023); the Muslim Public Affairs Council (28/02/2023); the Church of Jesus Christ of Latter-Day Saints (28/02/2023); the Union of Jewish Orthodox Congregations of America (28/02/2023); the Christian Legal Society (28/02/2023); the General Conference of Seventh Day Adventists (28/2/2023); and the National Jewish Commission on Law and Public Affairs and other Jewish Organizations (28/02/2023). Available at: <https://www.scotusblog.com/cases/case-files/groff-v-dejoy/>.

harms” when forced to choose between their job and religious obligations such as Friday prayers, fasting, or wearing the hijab.²²

Similarly, the Seventh-day Adventists and the Orthodox Union criticized the *TWA v. Hardison* standard²³ as misinterpreting Title VII and insufficiently protecting minority religions, enabling employers to deny even “modest accommodations” regarding Sabbath observance, holy days, daily prayers, or religious dress.²⁴ The Sikh Coalition noted that the low threshold undermined Title VII protections, allowing employers to reject reasonable requests under flimsy pretexts.²⁵ The American Hindu Coalition highlighted that the *de minimis* rule from *Hardison* was a “dictum”, leaving Hindus, Sikhs, Jains, Buddhists, and other minorities unable to rely on workplace norms when requesting accommodations like Diwali observance or prayer breaks, often facing segregation or stereotyping.²⁶

Faith groups emphasized that overruling the “more than *de minimis*” test would restore Title VII’s “original” scope, promoting inclusive workplaces, higher job satisfaction, organizational commitment, and reduced burnout, by enabling “robust religious accommodation policies” (Schoemaker and Clarke 2023).²⁷

Amicus briefs, some explicitly cited by the Supreme Court, argued that the “*de minimis* cost” test was too easily satisfied, leaving Orthodox Jews “at the mercy of their employers’ good graces.”²⁸ It also, they claimed, weakened protections for Sikhs by “eliminat[ing] any meaningful mandate to accommodate” their practices and “embold[ening] employers to deny reasonable accommodation requests.”²⁹ These faith-based actors contributed expertise, evidence, and legal arguments showing that the “more than *de minimis*” standard disproportionately burdened religious minorities. Their advocacy influenced the court’s unanimous reversal of the prior standard, establishing that employers must demonstrate “substantial increased costs” to deny accommodations. The court redefined “undue hardship” to require a significant employer burden and confirmed that co-worker animos-

22 *Groff v. DeJoy*, brief of the Muslim Public Affairs Council as amicus curiae supporting the petitioner, no. 22-174.

23 *Trans World Airlines, Inc. v. Hardison*, 432 US 63 (1977). In this case, the court ruled that an employer is not required to provide an accommodation if it imposes an “undue hardship,” which the court defined as any cost more than “*de minimis*.”

24 *Groff v. DeJoy*, brief for the General Conference of Seventh Day Adventists and the Union of Orthodox Jewish Congregations of America as amici curiae in support of the petitioner, no. 22-174.

25 *Groff v. DeJoy*, brief for the Sikh Coalition, Muslim Advocates, and the Islam and Religious Freedom Action Team as amici curiae in support of petitioner, no. 22-174.

26 *Groff v. DeJoy*, brief for the American Hindu Coalition as amicus curiae supporting the petitioner, no. 22-174.

27 *Groff v. DeJoy*, brief of the Muslim Public Affairs Council as amicus curiae supporting the petitioner, no. 22-174.

28 *Groff v. DeJoy*, brief as amicus curiae of the Union of Orthodox Congregations of America in support of the petitioner, no. 22-174.

29 *Groff v. DeJoy*, brief for the Sikh Coalition, Muslim Advocates, and the Islam and Religious Freedom Action Team as amici curiae in support of petitioner, no. 22-174.

ity cannot justify denial, while still allowing balancing against competing interests, though employers must make greater efforts to achieve accommodations.

The increasing use of amicus curiae briefs reflects a broader trend of judicial mobilization by faith actors, as religious organizations turn to courts – especially the US Supreme Court – to influence constitutional interpretation and advance their interests. Conservative faith actors’ strategic litigation has raised concerns about “restricting civic space and human rights”, including in matters of abortion and antidiscrimination law (Blokker 2024:406).³⁰ Meanwhile, religious minorities often face a “hostile legal environment,” struggling to align their practices with “dominant narratives” (Harm 2021:1208). Historically, however, US courts have provided an essential avenue for minority faiths, allowing them to claim Free Exercise Clause protections and obtain exemptions from generally applicable laws, which has thus served as a protective forum against state overreach.³¹

Third-party interventions that enable religious organizations and interfaith coalitions to support litigants have broader implications, reinforcing claims for accommodation and equal protection. Strategic use of amicus briefs has allowed religious actors to reshape judicial frameworks and strengthen religious rights (Schlink 2018:2023). Their involvement can mediate employer-employee tensions, help secular actors understand religious practices, and foster solutions that reconcile secular and religious frameworks, promoting a more inclusive workplace (Budabin and Sajir 2025; Raza 2023:202).

7. The involvement of faith actors in the immunization challenge

During emergencies, authoritarian measures often override normal protections of religious freedom to serve public interests (Hill 2020:27). Throughout the pandemic, this tendency sometimes fueled misunderstanding and discrimination against religious minorities (Medda-Windischer et al. 2025:185-249) and marginalized alternative perspectives on crises (Kurylo 2022:6; Vanhamel et al. 2021:82). However, the situation also underscored the importance of communication and cooperation between authorities and religious actors to create inclusive policies (Martínez-Torrón 2021:30).

In the US, faith actors, such as religious leaders and affiliated non-profits, have historically supported communities during crises, advancing shared goals and addressing local needs (Goodwin and Kraft 2022:29). Their involvement in past outbreaks strengthened “health system responsiveness” and promot-

³⁰ *Burwell v. Hobby Lobby Stores, Inc.*, 573 US 682 (2014).

³¹ *Sherbert v. Verner*, 374 US 398 (1963); *Wisconsin v. Yoder*, 406 US 205 (1972).

ed “people-centered” interventions (Gilmore et al. 2020:1). Following COVID-19 lockdowns, collaborations between health institutions and faith communities enabled safe planning for religious activities (Monson et al. 2021:2355). Religious organizations also received public relief funding alongside secular groups, reflecting their essential social role during emergencies (Chopko 2021:8-20).

Faith actors played a key role in the COVID-19 vaccination effort by sharing accurate information, addressing vaccine hesitancy, and countering misinformation tied to religious concerns (Niu et al. 2024:10; Moore et al. 2022:8931; American Muslim Health Professionals 2021; Carlisle 2021). By framing vaccination within supportive religious narratives, they helped to align faith with public-health goals and promoted vaccine uptake publicly (Tiwana and Smith 2024; Niu et al. 2024:13).

Collaborations between religious and public actors addressed cultural barriers and enabled context-sensitive strategies that considered “social structures, community norms, and belief systems” (Vanhamel et al. 2021:79; see also Niu et al. 2024:14; Syed et al. 2023:471; Blankship et al. 2021:1381; Gilmore 2020:2). Faith communities provided vaccination sites and connected stakeholders, improving access for minority and vulnerable populations and promoting equity (Tiwana and Smith 2024; Niu et al. 2024:17; Delgado 2021; Gilmore et al. 2020:5; Harris 2021; Syed et al. 2023:474; Monson et al. 2021:2353).

8. Diversity in the workplace

In the US, the unprecedented health crisis justified mandatory vaccination for various employees to protect public health, especially vulnerable populations (Gostin and Reiss 2025:1-3). However, this mandate has complicated traditional approaches to religious accommodation amid increasing religious pluralism, as the need to balance secular and religious beliefs challenges the ability to maintain special protections for religion (Schwartzman 2012:1352). Expanding exceptions too far can weaken public policy, while ignoring religious needs can harm minority groups (Madera 2023:135).

Scholars warn that broad religious exemptions for vaccines can lower vaccination rates, legitimize resistance, and be misused to weaken public-health policies (Reiss and Dubal 2018:756-762). In workplaces, rather than excluding religion, newer strategies aim to incorporate it to reduce discrimination and promote inclusivity (Yeste et al. 2022:491). This approach is gaining traction even in the traditionally separationist US, as companies increasingly accommodate employees’ religious practices (Colombo 2013:83). Employee resource groups (ERGs) support minority voices, facilitate religious accommodations, and help employers navigate diverse faith needs (Agovino 2024).

Religious figures are increasingly valued in workplace diversity and inclusion. Businesses' adoption of workplace chaplaincy, long established in the military and healthcare sectors, addresses employees' spiritual needs, offers counseling, and strengthens organizational culture. Chaplains provide psychosocial support, "bridge cultural divides", complement HR diversity initiatives (Miller et al. 2017:10-13), and can serve as "neutral negotiators" in accommodating employees' religious practices (Wolf et al. 2022:1155).

Involving chaplains in workplace religious accommodations can provide guidance, but giving them authority to judge the "authenticity" of employees' beliefs poses ethical and institutional challenges (Wirpsa et al. 2024:4486; Wirpsa et al. 2023:2). Rooted in specific faith traditions, chaplains may lack the capacity to fairly assess beliefs outside their own doctrines, risking favoritism toward conventional practices and undervaluing heterodox or personal spiritual expressions (Wirpsa et al. 2023:1-9). This is especially problematic for employees whose convictions are secular or non-religious, as chaplains may be ill-equipped to validate these beliefs (Farr et al. 2022:130). When religious figures mediate accommodations, non-religious or minority-belief employees may feel excluded or pressured to frame their principles in religious terms (Liefbroer et al. 2017:1776). Relying on a single religious authority also introduces legal risks, such as perceptions of favoritism or creating "a hostile work environment" (Wolf et al. 2022:1156; Wirpsa et al. 2024:4486; Harm 2021:1208).

Chaplains experience inherent role tensions because their position as employees can affect neutrality. They may feel pressure to make decisions on such issues as approving exemptions that are in line with organizational priorities, while at the same time their counseling function requires them to provide confidential support, which can conflict with reporting requirements (Wirpsa et al. 2023:1-9).

Workplace procedures should integrate diverse perspectives in both policy development and implementation so as to ensure that decisions reflect a wide range of cultural, religious, and ethical viewpoints (Beckert and Koch 2025:538; Wirpsa et al. 2023:1-9). Organizations must emphasize procedural fairness by applying policies consistently, transparently, and without bias, while allowing flexibility for sincerely held beliefs (Wolf et al. 2022:1155). Procedures should respect all belief systems, avoiding assumptions, stereotypes, or favoritism (Wirpsa et al. 2023:1-9). This approach fosters inclusivity, mutual respect, reduces conflict or discrimination risks, and supports legally sound, nuanced decision making regarding religious expression in the workplace (Wierstra et al. 2024:810; King and Williamson 2005:173-198).

Further research on these issues should integrate critical analysis and empirical inquiry, engaging employees, chaplains, managers, and other stakehold-

ers. Examining real-world cases can reveal tensions between organizational priorities, individual beliefs, and religious mediation. Policy recommendations grounded in both theory and lived experience are likely to be more equitable, inclusive, and attuned to contemporary workplace diversity.

9. Chaplains in interactive procedures: The need for further research in view of a change of paradigm

The growing use of interactive procedures – where employers and employees collaboratively address religious claims in the workplace – signals a potential shift in US religious accommodation practices. In July 2025, the US Office of Personnel Management issued memos encouraging federal agencies to adopt such procedures, suggesting that the EEOC may follow with similar guidance.³² Although concerns about “corporate disestablishment” exist (Nelson 2019:596), chaplains’ expertise in religious beliefs can be crucial in these processes, helping to evaluate exemption requests, mediate conflicts, and identify reasonable accommodations (Lee 2024:255; Wirpsa et al. 2023:1-9; Wolf et al. 2022:1148; Flake 2019:80). Their involvement may improve case-by-case assessments, reconcile employees’ faith with operational needs, and promote inclusive, culturally sensitive workplace solutions (Lee 2024:255; Wirpsa et al. 2023:1-9).

Despite its potential significance, the “intriguing phenomenon” of chaplains’ workplace participation remains underexplored (Miller 2018:1). Research is needed to understand how chaplains balance supporting employees’ religious expression with maintaining neutrality under Title VII, avoiding proselytization or favoritism, and ensuring non-discrimination (Nelson 2019:1946; Wolf et al. 2022:1155; Wirpsa et al. 2023:1-9). This includes examining how their role intersects with social, cultural, and organizational factors, such as minority religious identities, religious diversity, and organizational responsibilities for public health and safety.

Empirical investigation could combine qualitative and quantitative methods to capture the perspectives of employees, chaplains, managers, and policymakers. Such studies could examine how chaplains influence the mediation of religious conflicts, reduce biases, and support collaborative solutions that respect both individual beliefs and workplace obligations (Flake 2019:84; Lee 2024:255;

³² The memo requires federal agencies to engage in interactive procedures when an employee requests a religious accommodation, offering options such as flexible work schedules, scheduled breaks, credit hours, annual leave, compensatory time, time off, or leave without pay. It specifically encourages teleworking as a low-cost option that generally does not impose significant operational burdens. Agencies must justify denial of accommodation with evidence of substantial operational impact. Following the *Groff* standard, the Office of Personnel Management defines undue hardship as “substantial increased costs in relation to the conduct of the employer’s particular business” and clarifies that accommodations cannot be refused for “minor inconveniences.”

Wirpsa et al. 2023:1-9). Studies could also assess chaplains' role in shaping proactive workplace policies that anticipate religious needs, prevent conflicts, and minimize litigation (Alidadi 2017:169; Powers 2024:543).

The diversity of chaplains' backgrounds and expertise enables them to navigate differing religious narratives and intra-faith differences, thereby incorporating religious pluralism in workplace accommodations (Lee 2024:255; Garcia-Yeste et al. 2022:491; Miller 2021). In their advisory role, chaplains can support inclusive dialogue that aligns employees' faith commitments with organizational responsibilities, enhancing social solidarity, ethical awareness, and trust in institutions (Wirpsa et al. 2023:1-9). These possibilities merit further exploration.

Studies suggest that chaplains' involvement in interactive procedures could shift workplace accommodation from a "one-size-fits-all" model to a context-sensitive, participatory approach (Garcia-Yeste et al. 2022:493). Accordingly, future research should explore how chaplains balance individual convictions, corporate needs, and societal interests while complying with US employment law (Nelson 2019:1945; Wirpsa et al. 2023:1-9).

10. Closing remarks

The COVID-19 pandemic highlighted challenges in managing religious diversity in US workplaces, especially around vaccination mandates, and it emphasized the structural biases and limits of traditional Title VII accommodations. This paper has examined how faith actors use both reactive and proactive strategies – shaped by ongoing engagement and relational processes – to navigate conflicts and protect religious interests. Management of workplace religious diversity emerges not just from legal compliance but through interaction among employers, employees, faith actors, and other public actors. Reactive strategies include legal mobilization and advocacy, influencing judicial interpretation of religious rights versus organizational or public-health obligations. Participation in amicus briefs, such as in *Groff v. DeJoy*, helps faith actors safeguard immediate interests while contributing to precedent-setting decisions, enhancing protections for religious minorities and emphasizing case-by-case accommodation.

Proactive strategies anticipate conflicts and embed respect for religious diversity in organizational policies. Chaplains and other faith actors can facilitate dialogue and bridge gaps between employees' beliefs and operational needs, provided that they remain neutral and legally compliant (Wirpsa et al. 2023:1-9). Combining reactive and proactive approaches signals a shift toward context-sensitive, inclusive practices that support religious pluralism and workplace resilience (Garcia-Yeste et al. 2022:493).

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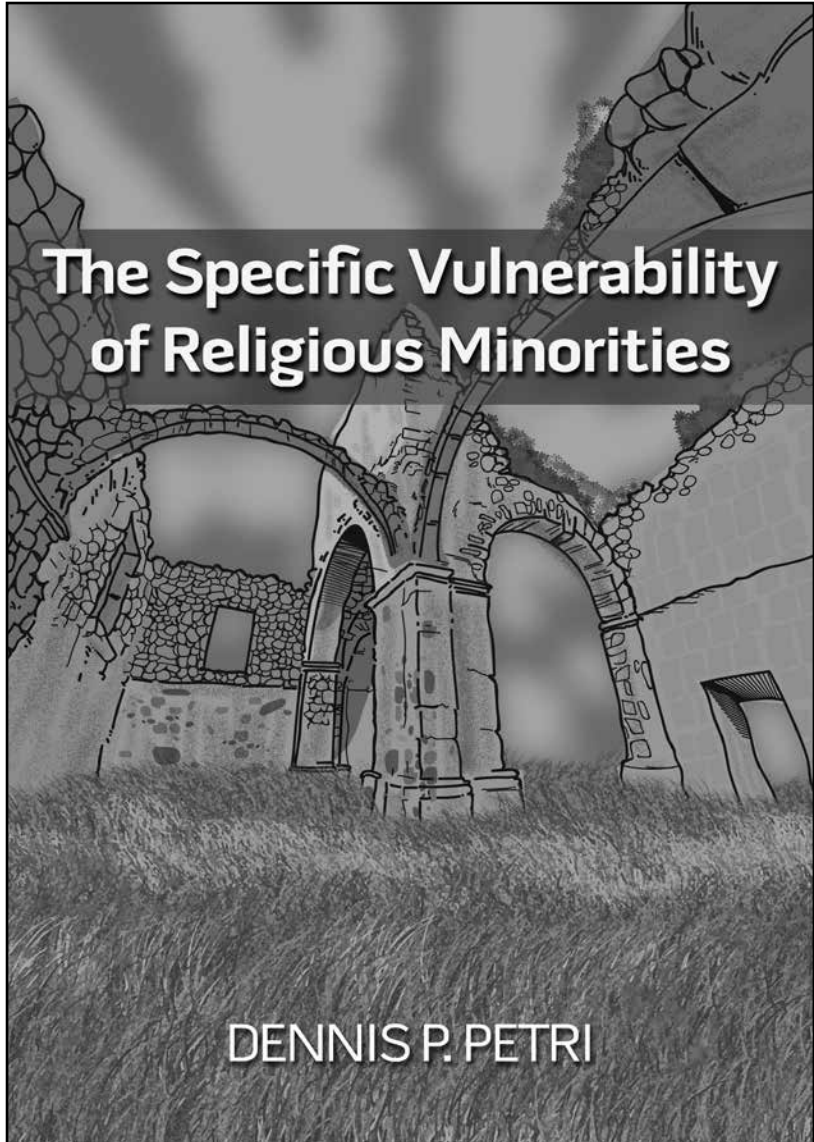
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