

UNITED STATES SUPREME COURT NARROWS THE DEFINITION OF DISABILITY UNDER THE ADA

The United States Supreme Court issued an opinion that clarifies and narrows the definition of disability for being unable to perform “manual tasks” under the Americans with Disabilities Act (ADA). *Toyota Motor Mfg., Kentucky, Inc. v. Williams* 2002 WL 15402 (Decided Jan. 8, 2000). The relevant facts of the case are as follows:

An assembly line worker for the Toyota engine manufacturing plant in Kentucky complained of carpal tunnel syndrome as a result of using pneumatic tools during her employment. At her doctor’s request, the plant initially accommodated her by limiting her responsibilities. For example, the employer altered her job responsibilities several times to address her carpal tunnel syndrome. However, when the employee continued not to be able to function at work as a result of her condition, the employer terminated the employee. The employee filed suit claiming that the employer had a responsibility to continue to accommodate her under the ADA. The employee claimed that she qualified as disabled under the ADA because the carpal tunnel syndrome left her unable to perform manual tasks at or above shoulder level for long periods of time.

The ADA defines ‘disability’ as “a physical or mental impairment that substantially limits one or more of the major life activities of such individual.” Regulations enacted in association with the ADA provide examples of major life activities, which include walking, seeing and performing manual tasks. The lower court ruled that to prove a substantial limitation on her ability to perform manual tasks, the employee had to show that her “manual disability involved a ‘class’ of manual activities affecting the ability to perform tasks at *work*.” The lower court went on to find that the employee met this burden because her ailments prevented her from performing tasks associated with certain types of manual assembly jobs.

The Supreme Court reversed the lower court’s ruling and criticized the lower court for confining its analysis to only a “limited class of manual tasks” associated with her job, rather than inquiring whether her impairment restricted her ability to perform tasks of “central importance to most people’s lives.” In rendering its decision, the Supreme Court clarified that the determining factor in whether an employee has a disability under the ADA is *not* whether the employee can perform tasks associated with a particular job, but whether the claimant can perform “major life activities” as these activities are defined in the ADA.

The bottom line is that when faced with a request for accommodation under the ADA based on an employee’s inability to perform manual tasks, municipalities should examine whether the condition has a broad affect on the employee’s ability to perform major life activities, not whether the employee can perform his or her job. This is an important ruling because, with common conditions like carpal tunnel syndrome, employees will often claim the inability to perform manual tasks as a disability and this ruling narrows the application of the manual task disability under the ADA.

It is worth noting that in rendering its decision, the Supreme Court specifically avoided the question of whether working itself could be a major life activity under the ADA. The Supreme Court stated that “because of the conceptual difficulties inherent in the argument that working could be a major life activity, we have been hesitant to hold as

much and we need not decide this difficult question today.” Accordingly, this is still an open legal question.

Finally, as always, the Law Center advises municipalities to consult an attorney when faced with an employment-related ADA issue to obtain fact-specific advice on how to deal with your particular situation. Better safe than sorry!

- Peter Stein, Intern, VLCT Municipal Law Center

VLCT News, February 2002