



SOCIAL SECURITY

April 16, 2026

C-2026-002681

Richard Couture
AFGE General Committee

By email only to Richard.Couture@ssa.gov

Mr. Couture,

This is informational notice of the Social Security Administration's (SSA or the Agency) revisions to the Personnel Policy Manual (PPM) S630_17 regarding religious accommodations. A copy of the revised PPM is attached.

These changes are intended to ensure compliance with updated federal law and guidance from the Office of Personnel Management. The revisions do not reduce or eliminate any existing rights, benefits, or procedures for religious accommodations, and all previously available options remain accessible to qualified employees.

Because the updates are required by law and government-wide policy, they do not reflect discretionary changes by the Agency. Accordingly, there is no obligation to bargain over the substance or implementation of these revisions, as they are mandated by external legal authority, and the Agency does not anticipate more than a de minimis impact on bargaining unit employees' conditions of employment.

If you have any questions, please contact me at Brandy.Williams@ssa.gov.

Regards,

Brandy Williams
HR Specialist
Labor-Management and Employee Relations

cc: Debbie Glenn
Barri Sue Bryant
Shelley Washington
Beverly Parks
Jessica LaPointe
Brenda Carsten

S630_17: Workforce Flexibilities to Accommodate Religious Needs

For bargaining unit employees, see applicable [Union/Management Contracts](#) in addition to the Personnel Policy Manual (PPM). Contract provisions take precedence over the PPM ([See Section 6](#)).

Contents

1. ISSUE DATE.....	1
2. EMPLOYEES COVERED.....	2
3. LAW AND REGULATION.....	2
3.1. Religious Accommodations.....	2
3.2. Interactive Process.....	2
3.3. Undue Hardship Analysis.....	3
4. SSA DELEGATIONS OF AUTHORITY.....	3
5. SSA POLICY.....	4
5.1. Religious Accommodations (See Section 3.2.).....	4
5.1.1. Annual Leave (See PPM S630_2).....	4
5.1.2. Leave Without Pay (LWOP) (See PPM S630_6).....	4
5.1.3. Religious Compensatory Time.....	4
5.1.4. Credit Hours.....	4
5.1.5. Change in Daily Tour of Duty.....	4
5.1.6. Telework (See PPM S650_1).....	4
5.2. Part-Time Employment (See PPM S610_2).....	4
5.3. Interim Religious Accommodations.....	5
5.4. Religious Activities Not Covered by This Policy.....	5
6. SSA LABOR-MANAGEMENT AGREEMENTS.....	5
7. RECORDS RETENTION.....	5

[Exhibit 1](#) – Effects of LWOP on Employment, Federal Benefits and Programs

1. ISSUE DATE

July 11, 2006 (Revised Month Day, Year)

2. EMPLOYEES COVERED

All SSA employees (including probationary employees).

3. LAW AND REGULATION

3.1. Religious Accommodations

Title VII of the Civil Rights Act of 1964 requires employers to make reasonable accommodations for an applicant or employee whose sincerely held religious belief, practice, or observance conflicts with a work requirement, unless providing the accommodation would create an undue hardship for the employer. The law aims to prevent individuals from being forced to choose between their religious convictions and practices and their job.

SSA provides religious accommodation to an employee when:

- The employee has a bona fide religious belief;
- The employee's religious belief conflicts with an agency work requirement (e.g., working overtime/credit hours on Saturday);
- The employee informs management of his/her religious belief, practice, or observance and the conflict; and
- The employee requests a religious accommodation.

3.2. Interactive Process

Once the employee requests a religious accommodation, the Agency must engage in an interactive process with the employee whereby the two (e.g., management and the employee) explore reasonable religious accommodation alternatives (See Section 5.1.). There is a requirement that management discuss with the employee accommodations that are viable and document the discussions. It is important to note that the reasonableness of an accommodation will be determined on a case-by-case basis.

When there are several possible accommodations, management should offer the one that least disadvantages the employee as it pertains to a term, condition, or privilege of employment. Example: If management can allow an employee to earn and use religious compensatory time for religious reasons rather than liberal approval of annual leave as an alternative accommodation, management should allow the employee to earn and use religious compensatory time. The Agency must accommodate an employee's sincerely held religious belief, practice, or observance unless doing so would create an undue hardship.

During the interactive process, the Agency is not required to provide the requested accommodation. As stated above, the Agency's obligation is to provide a reasonable accommodation. The reasonableness of an accommodation may vary on a case-by-case basis, so what may be a reasonable accommodation in one situation, may not be a

reasonable accommodation in another. For each request, the interactive process is essential to identifying reasonable accommodations for that individual request.

3.3. Undue Hardship Analysis

When an accommodation is identified during the interactive process, it should be documented as an outcome of that process. If management and the employee have engaged in the interactive process, but an accommodation is not agreed upon, then the Agency must conduct an undue hardship analysis (i.e., whether the requested accommodation would cause substantial increased costs or operational burden in relation to the conduct of the agency's business). Examples of an undue hardship to the Agency include but are not limited to:

- An accommodation that would require the agency to violate the terms of a collective bargaining agreement;
- An accommodation that would pose a risk to public health or safety; and
- An accommodation that would create a hostile work environment.

Likewise, it is important to understand what does not present an undue hardship. Examples include but are not limited to:

- A mere assumption that many more employees in the same religion may also request or need religious accommodations;
- Speculation as to the effects of granting the accommodation;
- General discontent or grumbling among employees; and
- Vague, unexplained statements of conflict with a seniority right guaranteed by a Collective Bargaining Agreement.

It is prudent to presume the Agency's obligation to provide a religious accommodation to an employee is fulfilled when:

- Reasonable alternatives to accommodate the employee's religious belief, practices, or observance are offered and documented; and
- There is no reasonable alternative available and actual evidence of undue hardship exists and is documented.

4. SSA DELEGATIONS OF AUTHORITY

See delegations of authority on

- [LEAVE](#)
- [RELIGIOUS COMPENSATORY TIME](#)
- [WORKWEEKS AND WORK SCHEDULES](#)
- [TELEWORK](#)

5. SSA POLICY

5.1. Religious Accommodations ([See Section 3.2.](#))

Supervisors should consider all of the following available options when an employee requests a religious accommodation. Supervisors should note that the establishment of a special administrative workweek is not permitted.

5.1.1. Annual Leave ([See PPM S630 2](#))

Leave approving officials ([See Section 3.](#)) should be liberal in approving accrued annual leave. This policy permits the granting of annual leave without the employee providing a detailed justification.

5.1.2. Leave Without Pay (LWOP) ([See PPM S630 6](#))

Leave approving officials ([See Section 4.](#)) should make every reasonable effort to approve requests for LWOP to meet religious needs. If the exigencies of the work preclude approval of LWOP, the employee will be expected to be on duty. If the employee fails to report for duty and does not contact his/her supervisor by the end of the work shift with a satisfactory explanation for the absence other than for the religious need, which was denied, the employee will be placed on absence without leave. When an employee requests LWOP for the first time in any leave year, the supervisor should notify the employee of the effects of leave without pay on employment, Federal benefits, and programs (see [Exhibit 1](#)).

5.1.3. Religious Compensatory Time

[See PPM S550 4.](#)

5.1.4. Credit Hours

See the Human Resources web page on [credit hours](#).

5.1.5. Change in Daily Tour of Duty

Management may consider changing the daily tour of duty for an employee to accommodate the employee's religious needs. Management should consider such items as the needs of the work unit and supervisory coverage before changing an employee's daily tour of duty. The change in the daily tour could be for one day a week every week or individual days several times a year.

5.1.6. Telework ([See PPM S650 1](#))

An employee may request episodic or scheduled telework to accommodate a religious belief, practice, or observance. Delegated approving officials will evaluate an employee's request accordingly ([See Section 4](#)).

5.2. Part-Time Employment ([See PPM S610 2](#))

Because of the impact of part-time employment on organizational ceilings and the accomplishment of the unit's work, management must receive authorization from the

delegated official for the use of part-time employment. If part-time employment is mutually agreeable to management and the employee, the employee may elect part-time employment.

5.3. Interim Religious Accommodations

When it appears reasonably likely that an employee will be entitled to a religious accommodation, but the accommodation cannot be provided immediately, the agency shall provide an interim accommodation that allows the employee to perform some or all of the essential functions of the job.

5.4. Religious Activities Not Covered by This Policy

Voluntary religious undertakings are not covered by this chapter. Examples of these undertakings include activities associated with the clergy rather than the lay members of a religious group and activities on church committees associated with fundraising or organizing church social events. Such undertakings are outside activities and are covered by the policies in the [Standards of Ethical Conduct for Employees of the Executive Branch](#).

6. SSA LABOR-MANAGEMENT AGREEMENTS

See [the Labor-Management and Employee Relations web site](#) for additional provisions applicable to bargaining unit employees.

Provisions in collective bargaining agreements (CBAs) pertain to the respective bargaining unit employees and govern over the provisions in the SSA Personnel Policy Manual (PPM), unless the provisions of the PPM implement a nondiscretionary mandate of Federal statute or law or a government-wide regulation that predated the execution of the CBA.

7. RECORDS RETENTION

Records must be kept according to the National Archives and Records Administration (NARA) General Records Schedule. 2.2., Employee Management Records and General Records Schedule 2.4., Employee Compensation and Benefits Records. These schedules can be accessed through the [NARA web site](#).