

Not Every Accommodation Request Is Reasonable

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Employers often assume that once an employee requests an accommodation under the Americans with Disabilities Act (ADA), the job becomes finding a way to say "yes." A recent federal appeals court decision serves as an important reminder that the law requires reasonable accommodations, not accommodations that fundamentally alter a position's essential functions. In December 2025, a federal appeals court ruled that a restaurant worker's request to sit for five minutes after every ten minutes of standing was not a reasonable accommodation. The decision highlights the importance of identifying essential job duties, engaging in the interactive process, and carefully evaluating whether a proposed accommodation allows an employee to perform the job's core responsibilities.

The Accommodation Request

Tawna Bowles applied for a cashier position with Chicken Salad Chick. During her interview, she disclosed that she had difficulty standing for extended periods and would require rest breaks while working. Notably, the hiring manager offered her the position before the interview concluded. Bowles never actually began working. When she arrived for her first shift, management informed her that there was an issue that needed to be addressed before she could start. Her accommodation request had prompted involvement from the company's human resources department, and the parties entered the interactive process. The employer requested medical documentation regarding Bowles' limitations. Bowles provided a physician's note stating that she needed a chair because of knee arthritis. The company then sought additional details about the nature of her restrictions, including:

- How long could she stand?
- How frequently would she need to sit?
- How long would the sitting periods last?

Bowles ultimately explained that she needed to alternate between standing for ten minutes and sitting for five minutes throughout her shift. The employer determined that it could not accommodate that request and advised Bowles that it had no position available that would allow her to remain seated for substantial portions of the workday.

Why the Court Sided With the Employer

Bowles filed suit, alleging that the company violated the ADA and Kentucky's civil rights law by refusing to accommodate her disability and by failing to engage in good-faith discussions regarding alternative accommodations. The appeals court disagreed. The court examined the actual duties associated with the cashier position. Although the title suggested register work, the job required far more than operating a point-of-sale system. Employees were expected to:

- Stock beverage stations and refrigerators
- Carry food from the kitchen to customers
- Prepare drinks
- Clean tables
- Vacuum floors
- Remove trash
- Clean restrooms
- Respond quickly to changing customer needs

The court emphasized that the position required constant movement, flexibility, and multitasking in a fast-paced environment. Under Bowles' proposed accommodation, she would spend approximately one-third of every shift seated. During those periods, she would be unable to perform many of the position's essential functions, leaving coworkers to absorb those responsibilities. According to the court, that accommodation would fundamentally change the nature of the job rather than merely enabling Bowles to perform it.

Why This Case Is Different From Other ADA Decisions

The court was careful to note that sit-down accommodations are not inherently unreasonable.

In prior cases, courts approved similar accommodations where the employee's primary responsibilities could be performed from a seated position. Examples included:

- A retail cashier whose duties could largely be performed from a stool.
- A mobile phone store employee whose job historically allowed sitting for much of the day.

Those positions, however, did not require the same level of mobility and rapid task-switching that the Chicken Salad Chick position demanded. The lesson is clear: accommodation requests are highly fact-specific. A reasonable accommodation in one workplace may be unreasonable in another.

Vague Requests Are Not Enough

The court also rejected Bowles' argument that her initial statement during the interview, that she needed to sit intermittently, constituted a sufficient accommodation request. The court noted that generalized statements about needing to sit "as needed" do not provide employers with enough information to evaluate whether an accommodation is feasible. Without information regarding frequency, duration, and operational impact, employers are left guessing. The ADA requires an interactive process, but it does not require employers to speculate about an employee's limitations or preferred accommodations.

What Employers Should Take Away From This Decision

This case reinforces several practical lessons for HR professionals and employers:

- **Maintain accurate job descriptions** that clearly identify essential job functions.
- **Document the realities of the workplace**, not just the written job description.
- **Engage in a meaningful interactive process** when accommodation requests arise.
- **Seek clarification and supporting medical information** when necessary.
- **Evaluate whether the accommodation allows the employee to perform essential functions**, rather than eliminating those functions altogether.
- **Remember that reasonableness is highly fact-dependent.**

Well-documented job descriptions and credible testimony regarding actual workplace demands can provide significant protection when accommodation decisions are later challenged.

When Accommodation Requests Conflict With Essential Job Functions

The court's message is straightforward: employers must engage in the interactive process and carefully consider accommodation requests. However, the ADA does not require employers to accept accommodations that fundamentally disrupt operations or eliminate essential job duties. When a position genuinely requires mobility, flexibility, and multitasking, an accommodation that effectively anchors an employee to one location for substantial portions of the workday may not be reasonable.

Need Guidance on ADA Accommodation Requests?

Employers frequently face difficult questions about disability accommodation obligations, essential job functions, and the interactive process. Careful analysis at the outset can help reduce legal risks and improve outcomes for both employers and employees. The [Employment Law attorneys](#) at Wilentz regularly advise employers on ADA compliance, accommodation requests, workplace policies, and employee relations issues. If you have questions about handling a disability accommodation request, call our team to discuss your situation.

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