

Chapter 2

EEOC Best Practices Support Best Practices for Spirit and Religion at Work

Pat McHenry Sullivan

Abstract This chapter describes the EEOC laws related to spirituality and religion in the workplace and discusses the challenges that are faced in this domain. Questions about what words and deeds are appropriate, when, where, and to what extent, have been staple topics in the spirit and work field since its inception. These are also constant questions in the field of employment and labor law, both at the federal and state level. As California employment attorney Gary Gwilliam notes, “in California we have a state commission and there are other broad based laws concerning discrimination in the workplace that are not directly related to the EEOC” (Gwilliam 2012a).

Laws administered by the Federal Equal Employment Opportunity Commission (EEOC) need not be a major inhibitor to the practice of spirit at work. Indeed, this chapter offers the hopeful prospect that laws that prohibit harassment and discrimination at work on the basis of religion can strongly support spirit at work in a way that honors diversity *and* supports a company’s bottom line. Hopefully, this will help guide employers and employees to prevent legal challenges (with all their attendant costs and disruptions) and to deal with any such challenges gracefully.

Questions about what words and deeds are appropriate, when, where, and to what extent, have been staple topics in the spirit and work field since its inception. These are also constant questions in the field of employment and labor law, both at the federal and state level.

As the nation’s workforce grows increasingly diverse, and as many in the public have strong feelings about diversity, the number of lawsuits centered on religious issues at work is expected to continue to rise.

P.M. Sullivan (✉)

Visionary Resources, 4200 Park Blvd. #119, Oakland, CA, USA

e-mail: pat@visionary-resources.com

Laws administered by the Federal Equal Employment Opportunity Commission (EEOC) need not to be a major inhibitor to the practice of spirit at work. (This may also be true of state laws and other federal laws, which are not the subject of this chapter.) Indeed, this chapter offers the hopeful prospect that laws that prohibit harassment and discrimination at work on the basis of religion can strongly support spirit at work in a way that honors diversity *and* supports a company's bottom line. Further, Chap. 20 of this Handbook, titled "Spirit of the Law: How Judges, Lawyers, Law Professors and Legal Staff Bring Spirit to Work" offers experience from judges, attorneys, law professors, legal staff, and clients who practice various forms of spirituality or religion at work. Hopefully, this will help guide employers and employees to prevent legal challenges (with all their attendant costs and disruptions) and to deal with any such challenges gracefully.

Understanding the Challenge of EEOC Laws

Title VII of the Civil Rights Act of 1964 prohibits employers [with 15 or more employees] from discriminating against individuals because of their religion in hiring, firing, and other terms and conditions of employment. The Act also requires employers to reasonably accommodate the religious practices of an employee or prospective employee, *unless to do so would create an undue hardship upon the employer* (see also 29 CFR 1605). ...A reasonable religious accommodation is any adjustment to the work environment that will allow the employee to practice his religion.

(US Equal Employment Opportunity Commission 2012a)

Understanding the Law Itself

EEOC notes that religious discrimination laws apply not just to people of traditional religions, such as Islam or Christianity, but also others who have "sincerely held religious, ethical or moral beliefs" (U.S. Equal Employment Opportunity Commission 2012b). That includes the growing numbers of people who identify as spiritual, not religious (Sanders 2010).

Some prohibited types of discrimination are the following:

- **Work situations** "including hiring, firing, pay, job assignments, promotions, lay-off, training, fringe benefits, and any other term or condition of employment"
- **Harassment** including offensive remarks [beyond the bounds of teasing] about religious beliefs or practices, but not offhand or nonserious isolated remarks
- **Workplace or job segregation** based on religion (including religious garb and grooming practices), such as assigning an employee to a noncustomer contact position because of actual or feared customer preference or not reasonably accommodating religious dress and grooming policies (e.g., the Jewish yarmulke and Muslim modesty standards).

- **Forced participation or nonparticipation** in any religious activity as a condition of employment (US Equal Employment Commission Compliance Manual, Section 12 –III A 2012).

The law does not require you to accommodate beliefs and practices if “doing so would cause undue hardship to the employer... it is costly, compromises workplace safety, decreases workplace efficiency, infringes on the rights of other employees, or requires other employees to do more than their share of potentially hazardous or burdensome work” (U.S. Equal Employment Commission Compliance Manual, Section 12 –IV B2).

For example, courts will probably require you to accommodate religious employee’s requirements for prayer by allowing them some flexibility of break time, but not if that would require you to shut down an assembly line, which would be extremely costly and disruptive for the company (*Farah v. Whirlpool Corp* 2004).

Nor does the law require you to change the nature of your business itself or to avoid questions in the hiring process that may affect employee beliefs. For example, your busiest workday is Saturday. You can’t ask a candidate if she is a Jehovah’s Witness or orthodox Jew or refuse to hire her on that basis. But you can ask if she can and is willing to work on Saturday; if she says no, you are free not to hire her on only the basis that she is unavailable for work when needed. If your company produces contraceptives, you can’t ask a candidate if he is Catholic or a member of another group that does not approve of contraceptives, but you can ask and hire on the basis of whether or not a person is willing to do the work needed to produce your company’s products.

All these questions give rise to legal questions that are far beyond the scope of this chapter, especially when no law is cut and dried or consistently applied. However, there are some powerful basic ways to deal with the laws, both with an attorney and on your own.

The High Cost of Challenges Based on EEOC Laws

Questions like “what is necessary accommodation” are constantly being tested in the courts (see, e.g., Office of Counsel 2005). How do you define a religious belief? How can you determine if a belief is sincere? When does accommodation become too costly or dangerous? What do you do when religious beliefs conflict with your dress code? When does accommodation to one employee’s beliefs offend another employee’s beliefs?

Such tests typically involve other standard employment questions: what makes a hostile environment at a workplace? When does conduct by a coworker or supervisor cross the line from annoying to harassing? Obviously, employers are advised to have the support of a labor attorney, versed in state as well as federal laws, to avoid legal challenges for many reasons:

- The median award for all employment-related claims in 2009 skyrocketed by 60 % over 2008. [In 2009, that was] \$326,640 (Giuliano 2010).
- As an employer, you will most probably have to pay your own legal costs, which include at a minimum hundreds if not thousands of hours of attorney time at \$200 and way up per hour, paralegal time at \$100 or more an hour; deposition costs that can easily run \$1,000 at least per day and many times more than that if an expert is deposed; court costs; production and travel costs; etc. (Law Office of Eugene Lee 2008).
- Costs of a suit also include the loss of productivity due to the time that is required by your HR employees, supervisors, training department, company officials, and others who may be witnesses or whose knowledge is required to defend a case.
- Intangible costs may include reduced company morale, loss of focus on the company mission, and damage to the company's reputation over a litigation period that can easily stretch into 2 years or more.

That doesn't begin to cover the time and costs of appeal! Plaintiffs' employment attorney Tom Crane noted that in South Texas, the typical discrimination case lasts an average of 22 months, whether it is filed in state or federal court, and that "employers tend to fare very well in appellate court, so they have strong incentive to contest any jury wins" and that appeals can take 1–2 years or more (Crane et al. 2010).

Resonance Between EEOC Laws and Basic Tenets of Spirit and Work

"The basic foundation of spirituality is dealing with others fairly, nondiscriminately, and honestly. This concept is fundamental to all of the antidiscrimination laws including those of the Equal Employment Opportunity Commission and the state and federal laws which widely prohibit discrimination in the workplace," says Gary Gwilliam, (Gwilliam 2012a) author of *Getting a Winning Verdict in My Personal Life: A Trial Lawyer Finds His Soul*; (Gwilliam 2007).

An integral part of the spirit and work movement has been stories, both the stories of individuals and the stories of groups. In the early 1960s, it was perfectly legal to discriminate against people at work on the basis of sex, race, age, and religion. As author Sullivan recalls the help-wanted ads in 1964 in Virginia and Washington, DC, there were categories for men, women, and colored. It was quite possible then to work in a large office where the only diversity was which Protestant church one attended or perhaps a mixture that included a few Jews and maybe one Catholic. The only exceptions would be at night when the African-American or Hispanic cleaning crew came in and might be subject to slurs about their ethnic backgrounds.

The various civil rights laws and cultural changes to diversity have meant that, at work, people of all backgrounds, all faiths, meet and interact. At work, employees

share the same concerns about promotions, downsizing, or the overall health of the company. We all want to be blessed by being seen and honored for who we are, not cursed by not being seen or by being treated only as a projection screen for another person's biases and fears.

Employees generally want boundaries to be set fairly, discipline to be clear and fair, and personal treatment to be kind, not harassing. They want employers to listen to their concerns, not brush them aside. Juries tend to agree.

Many a bitter expensive lawsuit could have been prevented by a simple apology. Jonathan R. Cohen writes in the *Southern California Law Review* (Cohen 1998):

Parents, or at least good parents, teach children to take responsibility when they have wronged another: *Apologize and make amends*. In contrast, lawyers typically counsel the opposite. Most lawyers focus on how to *deny* responsibility, including what defenses a client might have against a charge and what counterclaims. If a lawyer contemplates an apology, it may well be with a skeptical eye: Don't risk apology, it will just create liability. While the lawyer-client relationship is of course different from the parent-child relationship, the fact that parents frequently advise children to apologize, but that lawyers rarely advise clients to apologize, ought to give us pause. If apology is often in the best interest of children, could it often be in the best interest of adults?

The failure to apologize can also be a central factor in escalating conflict. ... At times a vicious cycle may arise. An offender who wants to apologize, but fears being sued, may refrain from apologizing—and the absence of an apology is precisely what triggers the suit.

How to Meet the Challenges and Work with the Opportunities of EEOC Laws

This chapter is definitely not intended to constitute legal advice; nor is the author qualified to provide it. Having worked within the offices of hundreds of lawyers since about 1971 (about a third of which involved employment law) and having summarized hundreds of employment law depositions from several states, the author can testify that money spent with a good labor attorney *before* there are legal challenges is money well spent.

Know that if problems arise, everything can face scrutiny by the other side, the judge, and possibly a jury. The following are some examples: the joke you forwarded via e-mail that someone finds demeaning, a memo you wrote about an employee's charge without taking time to check out the facts, all your training materials regarding harassment or discrimination, and all your employee manuals (or lack thereof). All those documents and the stories told by the various witnesses shape the story of how you treat employees and whether or not a judge or jury is going to hold you liable under EEOC Laws.

The following suggestions come from numerous attorneys, legal staff, and HR consultants over the years. Again, they are just a starting point, not a substitute for legal counsel.

Understand the Laws and Their Provisions

The EEOC manual regarding religion (Section 12 –IV B2 2012) is a great starting point for understanding the scope of the laws, especially if you understand general terms. For example, for conduct to be defined as harassment in any case, it must be so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

As in all labor law, EEOC counts as potential harassers on the basis of religion practically anyone with whom an employee comes in contact during the workday, e.g., coworkers, supervisors, upper management (even if they do not directly work with the employee), or even clients and customers who create a hostile workplace for the employee.

There is no substitute for reading and understanding the manual if you in any way supervise employees. As stated above, the harasser is not limited to an employee's supervisor or the chain of command above that. Constant questions in all employment law cases according to Gary Gwilliam include:

- Is the conduct the employee complains about severe and consistent enough to constitute harassment (not just doing something against an employee's personal preferences)?
- Did the employee suffer adverse employment decisions as a result of the harassment or discrimination?
- Did the supervisor or other powers know of the conduct complained about? If not, should they have known about it and set up procedures where employees felt free to make complaints?
- Were complaints addressed in a timely fashion and in a fair and consistent matter?
- Was there a lack of retaliation for making complaints so that employees do not fear speaking out?

Understand What You Need to Do to Stay Within the Law

The paragraph above gives examples of what you are expected to do or not do to stay in compliance with EEOC laws. You also may need to make some accommodations regarding religion (just as you may be required to accommodate for physical disability and other issues). The EEOC manual gives these examples: flexible scheduling, voluntary shift substitutions or swaps, job reassignments, and modifications to workplace policies or practices (US Equal Employment Commission Compliance Manual, Section 12 –IV A 2012).

The EEOC Manual offers best practices to reduce the risks of discrimination, harassment, and failure to accommodate legal actions. Best practices are found throughout the manual (pages numbers refer to the printed format in the manual, which can be accessed at <http://www.eeoc.gov/policy/docs/religion.html>):

- Employer best practices related to recruitment, hiring, promotion, discipline, discharge, compensation, and other terms or privileges of employment: p. 29.
- Employer *and employee* best practices regarding harassment, hostile work environment, and for balancing antiharassment and accommodation obligations with respect to religious expression: pp. 44–45.
- Employer *and employee* best practices regarding accommodations and permitting prayer are separate considerations under EEOC laws. Other forms of religious expression and employee-sponsored programs: pp. 86–89.

Following best practices as delineated by EEOC and having clear compelling business reasons for why such practices do not apply in specific situations will provide any employer an effective way to prevent EEOC challenges or defend them, should that become necessary.

Understand the Context of the Practice of Spirit at Work and Religious Questions at Work

Since the 1970s, beginning with the concept of servant leadership [servantleader.org] based on Christian principles, there has been a growing interest in spirit at work in all fields and industries. Major media including *Forbes*, *Newsweek*, *Wall Street Journal*, and *Los Angeles Times* have frequently reported as a legitimate, trackable trend the phenomena of God at work, of CEO's who guide their work through Buddhist, Christian, Hindu, or other traditional religious principles. Spirituality is a basic component of the conscious business movement, which has been well promoted by the Conscious Business Conference and its online videos of presentation (Weiss et al. 2009).

In the 1990s, many organizational development and training professionals found they just could not facilitate the kind of institutional change that was required without dealing with spiritual issues, so many papers at the OD Network conferences dealt with this issue. Many businesses have embraced the concept because businesses as well as the individuals who work there benefit (Sullivan 2008a, 86–90):

Companies benefit from improved customer service, heightened creativity and innovation, increased productivity and profits, plus decreased turnover and other costs. When spirit effectively connects with work, all tasks can become more purposeful and satisfying. The stage is set for compassionate and ethical conduct. Decisions are made on a wiser basis. Stress and symptoms of burnout ease. Individuals can go home with more energy at the end of the day than they had at the beginning. This sets the stage for a satisfying personal life, a good night's sleep, and another satisfying, productive day at work....

Says Patty Flaherty, director of Human Resources at Ford Motor Company (which offers its employees the Ford Interfaith Network [FIN] affinity group), "If everyone can bring all of themselves into the workplace and leverage the best of themselves, and feel appreciated for all who they are, then you get the best from your employees." (Sullivan 2008b)

If you talk to people within the spirituality and work movement, including lawyers and human resources officials, you will undoubtedly hear at least one of the common drivers of the desire to integrate spirit and work:

- The desire to heal the pain of stress, burn out, exhaustion or soul-destroying work
- The desire to work from one's faith and values (whether or not such values are expressed by a specific religion), not leaving them in the parking lot
- The desire to work with purpose, integrity, or as the Buddhists call it "right livelihood"
- The desire to work with others cooperatively, respectfully, and compassionately

Aren't these also basic human desires for anyone who works, whether or not the words "spirit" or "religion" are even mentioned?

Understand Some of the Ways Individuals and Companies Now Integrate Spirit and Work

Every chapter in *Handbook of Faith and Spirituality in the Workplace* offers a variety of ways that people now practice spirit and work, with or without official notice or approval.

Personal Experience in the Movement

I have had a unique view inside the growing movement, first as a temporary office worker who wanted only to supplement a freelance writing career, later as a freelance legal secretary or paralegal in law firms in Washington, D.C., and finally as a writer/consultant about spirit and work. In the 1970s, I noticed that if I was temping for someone who would return, there usually was something hidden in the desk drawer that spoke of the person's values: many Bibles, a few Bhagavad Gitas or Buddhist texts, or lots of meaningful poetry or quotes. In numerous conversations behind closed doors or off-site, people talked about how they applied spiritual practices to work. Each conversation was preceded by the other person's expressed fear that no one else would understand, so I had to promise not to say anything to anyone else.

In 1990, I took a full-time job as a floater in a huge corporate law firm to recover the costs of moving across country for graduate school in spirituality and psychology under (Matthew Fox 1994), author of *Reinventing Work* (2004). Shortly after my benefits kicked in, the first of three close relatives across the country became fatally ill. This required working a lot of overtime to pay for frequent plane trips across the country and the use of all vacation time so my husband and I could tend people we loved.

Working for lawyers is almost always stressful, and during this time, the firm went through three downsizings. The only way I could get through the workdays without being fired was to pray. That led to bringing my own spiritual practices to work, and reaching out to kindred spirits.

I soon discovered that this corporate law firm was filled with people from all faiths who were highly creative at unobtrusively integrating spirit at work:

- The senior labor attorney's mini-library of texts from all faiths helped him understand others and gain wisdom for stressful days.
- A receptionist used prayer to help her fulfill her highest calling of hospitality, even when she felt down herself. She did it so well that that people throughout the firm recognized her as a spirit lifter and spiritual confidante.
- An HR manager brought to the office a rock every time she went to a religious retreat. During hard days, she'd often hold a rock and remember the faith that had drawn her to the retreat and obtain guidance on how she could best work within her values. When she discovered that many employees unconsciously grabbed one of the rocks and held them when they were discussing employee issues with her, she moved the rocks closer to the side of her desk where employees could easily access them.
- Throughout the firm, employees posted psalms, Sutras, quotes, prayers, affirmations, and poems that people in their cubicles to nurture, sustain, or guide them.

My husband John's employment in 1995 as the research director of a large spirit and work resource guide connected me to the Bay Area OD (Organizational Development) Network. That led to photographing what I began to call workplace altars for a presentation at the OD network and later at several spirit and work conferences. Many of those photos came from the corporate law firm (Sullivan et al. 1999).

Talking with hundreds of people about spirit and work since then and writing a column on spirit and work for the *San Francisco Chronicle* for several years led to writing a book (Sullivan 2003) and many articles. It also led to being part of many conferences, founding, and facilitating a group on spirit and law for several years in San Francisco, and being part of many spirit-based legal gathering as well as meetings on spirit and work generally.

These discussions and stories from many places have led to the belief that almost any religious practice can be done discreetly, quietly, respectfully, and without force. For example:

- A Wiccan had to stop chanting in the bathroom on breaks, because it upsets other employees.
- A person from a similar faith was allowed to chant away with incense provided she did this within break-time boundaries and in a part of the warehouse where incense would not disturb others.
- Many prayer partners at work who come from different faiths find that praying behind closed doors with another who was true to his or her faith is a powerful practice.

- There is widespread adoption of faith practices across religious lines, particularly contemplative practices.
- How employers relate to the reality of their employees can make a huge difference. One law firm created a very moving funeral at Golden Gate Park in San Francisco for one of its employees who was estranged from his family. “We just decided we were his family,” said a managing partner. After the nonreligious but deeply moving service, the firm’s partners offered lunch, which led to a strong spirit of bonding and appreciation within the firm.

Since 1995, I have been studying and reporting on spirit and work practices. This includes talking with hundreds of people not necessarily about a specific religion but about what made their work meaningful, purposeful, ethical, and stress-free, or not. By far the most common practices I found are prayer, meditation, and the use of spiritual quotes or religious texts. These practices can be done discreetly, without notice by anyone else.

Understand and Defuse Employee Concerns Before They Turn into Legal Problems

Gary Gwilliam is definitely not the kind of lawyer an employer wants to meet in a legal case. As a litigator on behalf of plaintiffs with personal injury and employee matters, his firm has won many huge verdicts. “Most of these employment cases would never have gone beyond a discussion between the disgruntled employee and someone in HR if the company representative had simply listened better and been more respectful,” he says. “Almost all the cases that ended up in protracted litigation could have been settled much sooner at way less cost had the company been willing to accept responsibility when they knew the truth of an employee’s charge.” (Gwilliam 2012b)

Gwilliam continues:

Costs go way down when both sides are willing to focus on helping to make both parties as whole as possible, not turn a matter into a nit-picking procedural duel between litigators. Too many people think that the only good lawyer or a company official with labor problems is a mean lawyer or company official. But that’s not true. Compassionate, courteous attention to employees can be a great companion to firm boundaries and adherence to regulations that are within the law. Proof that you give compassionate, courteous, prompt and quick attention to employee concerns will go a long way to defusing any claim and reducing any potential damages.

I’ve found that when I am civil to the attorney on the other side, he or she tends to be more civil with me. That reduces costs and helps settle an issue more favorably for both sides, more easily and more quickly. (Gwilliam 2012b)

Simple etiquette can also be useful. When people feel respected, they are more likely to be fully present and engaged, ready to roll up their sleeves for effective work, says Jodi R.R. Smith, director of Mannersmith Etiquette Consulting in Marblehead, Massachusetts. People’s discomfort, on the other hand, chills the workplace dynamic (Sullivan 2008b).

Etiquette guides for decades, if not centuries, suggested not talking about religion in public gatherings outside one's own religious community because it was just too volatile an issue. The move toward ecumenism in faith communities since the 1960s, the trend toward eclectic faith practices, and the increasing diversity have helped increase the number of discussions about spirit at work. Still, there are many who feel uncomfortable talking about any issues of faith or spirit.

I wrote in an article in *Workforce Management Magazine*: “Within every group lies a huge variety of beliefs and personal preferences. Some people love talking openly about matters of meaning; others want privacy. Some find solace and guidance in meditation; others are uncomfortable with silence. The biggest blessing you can give your employees is to see and honor them as they are, not who you fear them to be, or want them to be. Your job is not to approve their meaning and values, but to help them respectfully bring their meaning and values to work, for the benefit of all” (Sullivan 2008b).

Understand Employee Concerns About Religion or Spirit at Work

People of all faiths may borrow practices and ideas freely from each other, yet the phrase “one man's meat is another man's poison” is very true if employees—like the general public—feel anything is forced on them or that one person's faith threatens their own.

Much as many people of all faiths swear by the benefits of meditation and yoga to relieve stress, many people in various faiths fear that such practices lead to heathen (which some define as innately evil) practices that could lead their practitioners away from their true faith. There's huge fear among many Christians and perhaps many of other faiths that the whole topic of spirit and work is part of some conspiracy by New Agers (whatever that means to the accuser), that at the least will make people flaky and at worst will lead them away from their true faith. Many people who practice things that might be considered to be New Age, such as meditation (or affirmations), fear being forced into supporting various religious dogma they just can't accept.

Listen to some cable news shows, and it's easy to assume that all Arabs are Muslims, and all Muslims are probably terrorists who will do anything to enforce Shariah religious law on the rest of us. Almost every Christmas season, commentators proclaim that the trend of companies offering holiday greetings or parties is a war on Christmas, not a respectful nod to the fact that the workplace is filled with many people who celebrate holidays including Diwali or Channukah, not Christmas, and that sometimes the Christmas season overlaps with at least a part of Ramadan.

Here's the truth you have to deal with: the larger your company, the more likely it is you will have employees on every side of every controversy. You may have to set boundaries regarding the extent to which employees express their controversial

and highly charged religious feelings at work without disrespecting their right to have them.

Tricia Molloy (2006), author of *Divine Wisdom at Work*, suggests that when talking about spirit and work, often it is best to use terms like “universal” instead of “spiritual” or “reflection” instead of “meditation.” Such language, she says, is less charged than religious language.

There’s probably no better way to understand how others feel harassed, unaccommodated, or discriminated against than to notice when you could have such feelings yourself if you were in the other person’s shoes. Whatever your faith, you can try see better the issues of people from diverse religions in diverse workplace challenges. “Discover which practices make you squirm, which inspire you. Notice your own awe, wonder, fears and vulnerability around spiritual issues. Notice how some ways people talk about spirituality or religion are comfortable and inviting to you, and which are not” (Sullivan 2008b).

References

- Cohen, Jonathan R. 1998. “Advising Clients To Apologize,” *Southern California Law Review*, Vol. 72:1009.
- Crane, Tom, “General Length and Cost of a Lawsuit,” March 9, 2010. <http://www.sanantonioemploymentlawblog.com/2010/03/articles/general/length-and-cost-of-a-lawsuit/>, retrieved March 9, 2012.
- Farah v. Whirlpool Corp.* 2004. 3:02cv424 (M.D. Tenn. Oct. 16, 2004).
- Fox, Matthew. 1994. *The reinvention of work: A new vision of livelihood for our time.* San Francisco: HarperCollins.
- Giuliano, Jim. 2010. “What’s An Employee Lawsuit Costs These Days?”, January 12, 2010 at <http://www.hrmorning.com/whats-an-employee-lawsuit-cost-these-days/> retrieved March 9, 2012.
- Gwilliam, J. Gary. 2012a. Personal memo to author Sullivan, March 6, 2012.
- Gwilliam, J. Gary. 2012b. Interviews with author Sullivan, February-March 2012.
- Gwilliam, J. Gary. 2007. *Getting a Winning Verdict in My Personal Life: a Trial Lawyer Finds His Soul*; Pavior Publishing.
- Molloy, Tricia. 2006. *Divine wisdom at Work: 10 universal principles for enlightened entrepreneurs.* Aha! House.
- Office of Legal Counsel, United States Equal Employment Opportunity Commission. 2005. “Selected Cases on Religious Discrimination”, May, 2005, at http://files.ali-aba.org/thumbs/datastorage/skoobesruoc/pdf/CL018-CH15_thumb.pdf, retrieved March 8, 2012.
- Sanders, Joshunda. 2010. ‘Spiritual but not religious’ becoming more common self-identification, Austin American-Statesman <http://www.statesman.com/news/local/spiritual-but-not-religious-becoming-more-common-self-719642.html>, retrieved March 10, 2012.
- Sullivan, Pat McHenry. 2008a. “Spirit: A Vital Key to Engagement at Work,” in Volume 2, *Building High-Performance People and Organizations*, Westport, Connecticut: Praeger Perspectives.
- Sullivan, Pat McHenry. 2008b “Spiritual Etiquette at Work,” in *Workforce Management*, November 15, 2008 <http://www.workforce.com/article/20081115/NEWS02/311159998>, retrieved March 9, 2012.
- Sullivan, Pat McHenry 2003. *Work with Meaning, Work with Joy: Bringing Your Spirit to Any Job.* Chicago: Sheed & Ward.

- Sullivan, Pat McHenry, "Workplace Thinking Has Been Altered", originally published November 28 1999 in the *San Francisco Examiner & Chronicle*, available at <http://www.cuttingedge.law.com/content/workplace-thinking-has-been-altared>.
- U.S. Equal Employment Opportunity Commission. 2012a. *Facts About Religious Discrimination*, <http://www.eeoc.gov/eeoc/publications/fs-religion.cfm>, retrieved March 8, 2012.
- U.S. Equal Employment Opportunity Commission. 2012b. *Types of Discrimination*, <http://www.eeoc.gov/laws/types/religion.cfm>, retrieved March 8, 2012.
- U.S. Equal Employment Commission Compliance Manual, Section 12 –IV B2. 2012.
- U.S. Equal Employment Commission Compliance Manual, Section 12 –III A. 2012.
- U.S. Equal Employment Commission Compliance Manual, Section 12 –IV A. 2012.
- Weiss, Joe; Mirvis, Phil; Kaipa, Prasad, and Neal, Judi. 2009. "Spirituality And Conscious Business Panel", 2009 Conscious Capitalism Conference, May 29, 2009 http://www.youtube.com/watch?v=b36reiBkJoM&list=PL110AA4FDE0207DC3&index=5&feature=plpp_video, retrieved March 8, 2012.