Supreme Court Limits Application of the ADA
January 10, 2002

In a unanimous opinion, the U.S. Supreme Court has adopted a narrow definition of "disability" under the Americans with Disabilities Act (the "ADA"), 42 U.S.C. § 12101 et seq. and, in so doing, has significantly limited the class of persons who will be able to invoke the protections of the statute. In Toyota Motor Manufacturing, Kentucky, Inc. v. Williams, No. 1089 (January 8, 2002), the Court ruled that a person is not disabled under the ADA unless he demonstrates that he suffers from a physical or mental impairment of a permanent or long term nature that renders him unable to perform tasks of central importance to most people's lives. It is not enough to show an inability to perform tasks needed to work at a particular job.

Ella Williams, the plaintiff, worked on the assembly line in Toyota’s automobile manufacturing plant in Georgetown, Kentucky. After developing bilateral carpal tunnel syndrome and tendinitis, she was reassigned to new position in the paint inspection department. Thereafter, she began suffering pain in her neck and shoulders and was diagnosed with inflammation of the muscles and tendons around the shoulder blades, median nerve irritation, and pain in the nerves leading to the upper extremities. She insisted that she no longer could perform some of the tasks required in paint inspection, and she requested that Toyota accommodate her condition by relieving her of the obligation to perform those tasks. After Toyota denied her request, she began missing work on a regular basis. When Williams was discharged for poor attendance, she filed suit, alleging that her termination violated the ADA.

In upholding her right to seek relief under the ADA, the U.S. Court of Appeals for the Sixth Circuit ruled that Williams was disabled under the ADA because her impairments prevented her from engaging in a class of manual activities that affected her ability to perform tasks at work. The Supreme Court reversed, ruling that the Sixth Circuit had applied an overly expansive definition of disability.

The Court began its analysis with the language of the statute. The ADA provides that an individual is "disabled" if he or she has a "physical or mental impairment" that "substantially limits" one or more "major life activities." Noting the qualifying language utilized in the statutory definition -- only "substantial" limitations on "major" life activities are covered -- the Court concluded that only severe restrictions on activities of central importance to daily life, and that are permanent or long-term in nature, fall within the ambit of the statute. The Court emphasized that the statutory definition must be interpreted in a manner that creates "a demanding standard for qualifying as disabled."
Turning to the facts of the case before it, the Court acknowledged that the ability to perform manual tasks can constitute a "major life activity," but found that it is not sufficient for a plaintiff to show only an inability to perform the manual tasks involved in a particular job. As the Court stated, "When addressing the major life activity of performing manual tasks, the central inquiry must be whether the claimant is unable to perform the variety of tasks central to most people's daily lives, not whether the claimant is unable to perform the tasks associated with her specific job."

The Court found that Williams's condition failed to meet this standard. Specifically, the Court noted that Williams was able to perform a broad range of manual tasks, such as brushing her teeth, bathing, tending her garden, preparing breakfast, doing laundry and picking up around the house. While Williams claimed that she avoided sweeping, had quit dancing, spent less time playing with her children and gardening, could not drive long distances, and needed occasional help dressing, the Court found that such changes did not amount to severe restrictions on activities of central importance to most people's day to day lives. Accordingly, the restrictions created by Williams's condition did not rise to the level of a covered disability.

Clearly, the Supreme Court's decision significantly limits what constitutes a disability under the ADA by requiring plaintiffs to demonstrate considerable and long lasting restrictions on activities that are of central importance to most people's daily lives. Employers must remember, however, that several states, including both California and New York, have laws that define disability more broadly than does federal law. A condition that does not meet the standard articulated by the Supreme Court under the ADA may well constitute a disability under these more expansive state laws. See California Law Broadens Protections for Disabled Employees and Applicants (November 2000) and A Comparison of the Definition of "Disability" in the Americans With Disabilities Act, the New York State Human Rights Law, and the New York City Human Rights Law (July 2001). Accordingly, employers should continue to proceed with caution in personnel actions involving employees or applicants who suffer from physical or mental impairments.