

# Answers to questions



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TOYOTA MOTOR MANUFACTURING KENTUCKY, INC. V. WILLIAMS SUPREME COURT OF THE UNITED S, 534 US. 184 (2002) [Claiming to be unable to perform her automobile assembly line job because she was disabled by carpal tunnel syndrome and related impairments, Ella Williams sued petitioner, Toyota Kentucky, her former employer, for failing to provide her with a reasonable accommodation as required by the American Disabilities Act (ADA). The district court granted petitioner summary judgment, holding that respondent's impairment did not qualify as a "disability" under the ADA because it had not "substantially limit[ed]" any "major life activity", and that there was no evidence that Ms. Williams had had a record of a substantially limiting impairment or was regarded as having such an impairment. The Sixth Circuit reversed, finding that the impairments substantially limited respondent in the major life activity of performing manual tasks. In order to demonstrate that she was so limited, said the court, Williams had to show that her manual disability involved a "class" of manual activities affecting the ability to perform tasks at work. She satisfied this test, according to the court, because her ailments prevented her from doing the tasks associated with certain types of manual jobs that require repetitive work with hands and arms extended at or above shoulder levels for extended periods of time. In reaching this conclusion, the court found that evidence that she could tend to her personal hygiene and carry out personal or household chores did not affect a determination that her impairments substantially limited her ability to perform the range of manual tasks associated with an assembly line job. The court granted her partial summary judgment on the issue of whether she was disabled under the ADA. The Supreme Court granted certiorari.]

## Case Questions

1. Was it proper for the court of appeals to focus on Ms. William's inability to perform the tasks associated with her job in determining whether she was disabled under the ADA
2. Does the definition of "disability" under the ADA focus solely on the workplace and employment
3. What relevance do occupation-specific tasks have in the inquiry whether an employee is substantially limited in the major life activity of performing manual tasks so as to be disabled under the ADA

The Americans with Disabilities Act (ADA) is grounded in the will to provide equal opportunity in employment, transportation, public accommodations, public services, and telecommunications for individual with disabilities. Any proceedings under the ADA must first determine whether the claimant is disabled as defined by the Act. According to the ADA, "an individual is considered to have a 'disability' if s/he has a physical or mental impairment that substantially limits one or more major life activities, has a record of such an impairment, or is regarded as having such an impairment" (page 2), with "major life activities" referring to "activities such as seeing, hearing, speaking, walking, breathing, performing manual tasks, learning, caring for oneself, and working".

Evidently, given the range of activities and spheres of the ADA definition, determining whether the claimant is disabled includes but is not limited to her ability to perform work-related tasks. There is thus no support in the Act for the Court of Appeals' idea that the question of whether an impairment constitutes a disability is to be answered only by analyzing the effect of the impairment in the workplace.

The Court's focus on Ms. William's inability to perform the tasks associated with her job in determining whether she was disabled under the ADA could be justified if the claimant could prove that she is a "qualified individual with a disability", which in turn would justify her suit against Toyota for the lack of provision of reasonable accommodation. This was not the case. Firstly, both Sutton and the Equal Employment Opportunity Commission (EEOC) have established that a claimant would be required to show an inability to work in a "broad range of jobs," rather than a specific job. Not only did the Court erroneously focusing on one highly specialized manual job, the District Court also noted that at the time the respondent admitted that she was able to do the manual tasks required by her original two jobs in QCIO (Quality Control), further evidence that her alleged disability did not substantially limit her ability to perform work-related manual tasks.

Thirdly, when assessing the claimant's ability to perform the major life activity of manual tasks, the central inquiry must be the claimant's inability to perform the variety of tasks central to most people's daily lives, not those tasks associated with her specific job, in this case, "repetitive work with hands and arms extended at or above shoulder levels for extended periods of time". The court, therefore, should not have considered the respondent's inability to do such manual work as sufficient proof that she was substantially limited in performing manual tasks.

At the same time, the Court of Appeals appears to have disregarded the very type of evidence on which it should have focused. It treated as irrelevant "the fact the respondent can tend to her personal hygiene and carry out personal or household chores," and this even after her condition worsened, yet these are among the types of manual tasks of central importance to

people's daily lives. While the respondent's deposition testimony indicates that her medical condition caused her to quit dancing, to occasionally seek help dressing, to reduce how often she plays with her children, gardens, and drive long distances, these changes in her life did not amount to such severe restrictions in the activities that are of central importance to most people's daily lives that they establish a manual task disability as a matter of law. On this record, it was therefore inappropriate for the Court of Appeals to grant partial summary judgment to the respondent on the issue of whether she was substantially limited in performing manual tasks, and its decision to do so must be reversed and remanded.