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## SUPREME COURT ISSUES LANDMARK DECISION, LIMITING THE DEFINITION OF "DISABLED" UNDER THE ADA (January 9, 2002 )

### Summary

Yesterday, the United States Supreme Court decided the widely-anticipated case of [Toyota Motor Manufacturing v. Williams](#), in which it narrowed the class of employees covered by the Americans with Disabilities Act. Although this case has received considerable attention in the press, California employers should be cautious before implementing any changes to their human resources' policies or practices.

### Details

In *Toyota Motor Manufacturing*, Ella Williams claimed to be disabled by carpal tunnel syndrome, along with other ailments. Her medical problems interfered with her ability to do her automobile assemblyline job, and also caused her "to avoid sweeping, to quit dancing, to occasionally seek help dressing, to reduce how often she plays with her children, gardens, and drives long distances." However, she was still able to brush her teeth, wash her face, bathe, tend her garden, fix breakfast, do laundry, and pick up around the house. The Sixth Circuit Court of Appeals ruled that Ms. Williams was disabled under the ADA. The Supreme Court granted review of the case to establish what is or is not a "disability" protected by the ADA.

Under the ADA, an employee is disabled if he or she has a medical condition that substantially limits a major life activity. According to the Court, the use of the word "substantially" in the statute requires that the impairment's impact be permanent or long-term and severely interfere with major life activities.

The Court also held that "major life activities" refers only to those activities or manual tasks central to most people's daily lives, and not simply manual tasks unique to a specific job. In this case, Ms. Williams' inability to work with her arms extended above her shoulders was insufficient proof that she was substantially limited in performing manual tasks in general. Nor did the other restrictions in her activities, such as avoiding sweeping, "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." Indeed, according to the Court, Ms. Williams' ability to do household chores, bathe, and brush her teeth helped to show that she was not substantially limited in performing manual tasks.

### What this means

Although this decision is being hailed as a landmark in ADA law, it will not make life much easier for California employers. California employers are subject to the state Fair Employment and Housing Act ("FEHA"), which, especially after Legislative changes in 2001, affords employees much broader protections than the ADA. In fact, in contrast to the ADA, the FEHA broadly defines "disability" as a condition that *in any way* makes a major life activity difficult, and the term "major life activity" includes

working at a particular job or a broad range or class of jobs. In short, although employees with Ms. Williams' symptoms will not be considered disabled under the ADA, the same employees *would* be considered disabled under California's law.

This E-Update was authored by [Corry Ausink](#). If you have any questions about this E-Update, please contact Ms. Ausink or any PP&S attorney.

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