

Toyota v. Williams: Determining Disability Under the ADA

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In *Toyota v. Williams*,¹ the Supreme Court narrowed the interpretation of when impaired manual skills can be considered to be a “substantial limitation” of a “major life activity” under the Americans with Disabilities Act (ADA).² The Court concluded that it is insufficient to demonstrate impairment only at occupation-specific tasks. Claimants must demonstrate permanent or long-term impairment in ability to perform “activities that are of central importance to most people’s daily lives.”

Facts of the Case

Ella Williams began working at Toyota’s Kentucky manufacturing plant in August 1990 (coincidentally just weeks after the ADA was signed into law), assigned to an assembly line where she used pneumatic tools. She eventually experienced bilateral upper extremity pain, sought treatment, and received a diagnosis of bilateral carpal tunnel syndrome and tendinitis. Her physician placed her on permanent work restrictions precluding her from heavy lifting, constant repetitive wrist and elbow activities, and use of vibratory or pneumatic tools. Over the next two years, Toyota assigned Williams to various modified-duty jobs, although she had to miss some work for medical leave and filed a workers’ compensation claim, which was settled. After returning to work, she was dissatisfied with the accommodation efforts and filed her first ADA claim. This claim was also settled, and Williams returned to work in December 1993 to a different position, in quality control. In this job, she visually inspected painted cars for any flaws and

also had to wipe each car manually with a glove as it moved along the conveyor. She was physically capable of performing both functions, and her performance was satisfactory. In the fall of 1996, Toyota required quality control inspectors to rotate through two additional tasks, including a process where inspectors spread highlight oil on each car and again visually inspected it for flaws. Wiping the cars with oil required Williams to hold her hands and arms at shoulder height for several hours at a time. Soon after adding these tasks, Williams began to experience pain in her neck and shoulders that was diagnosed as myositis, tendinitis, and thoracic outlet compression. She requested that she be allowed to return to her original two quality-control tasks, claiming that she could perform them without impairment. There is disagreement about whether Toyota refused or whether Williams simply began missing work regularly. Ultimately, her doctor restricted her from work of any kind. Toyota terminated her employment citing her poor attendance record. Williams ultimately filed suit in U.S. district court claiming protection under the ADA, the Kentucky Civil Rights Act, and the Family and Medical Leave Act of 1993 (FMLA).³

Williams claimed disability because her physical impairments substantially limited her in manual tasks, housework, gardening, playing with her children, lifting, and working—all of which she claimed were major life activities under the ADA. After cross motions for summary judgment, the district court granted Toyota summary judgment, finding that Williams had not been disabled under the ADA at the time of her termination and would not be covered for protection under any of the three acts. Although Williams clearly had a physical impairment, the district court found that it did not qualify as a disability, because it had not substantially limited

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any major life activity. Dismissing housework, gardening, and playing with children as major life activities, the court also found no evidence that Williams was substantially limited in lifting or working. It found that she was not substantially limited in performing manual tasks, given her repeated insistence that she could do other manual tasks (such as the initial quality-control tasks) and could engage in other activities such as household chores and maintenance of personal hygiene (e.g., brushing her teeth, washing her face, bathing, gardening, preparing breakfast, doing laundry, and keeping a tidy home).

On appeal, the Sixth Circuit Court of Appeals reversed the disability ruling,⁴ finding that Williams did “show that her manual disability involved a ‘class’ of manual activities affecting the ability to perform tasks at work” (Ref. 4, p 843), and outlined that her ailments prevented her from doing tasks associated with some manual assembly line jobs, including the job at Toyota. The appeals court specifically disregarded the evidence that Williams could tend to her personal hygiene and perform personal and household chores, reasoning that this evidence “does not affect a determination that her impairment substantially limited her ability to perform the range of manual tasks associated with an assembly line job” (Ref. 4, p 843). Williams was awarded partial summary judgment on whether she was disabled. The Supreme Court granted *certiorari* to consider the proper standard for assessing whether an individual is substantially limited in performing manual tasks.

Ruling and Reasoning

Justice O’Connor delivered the Court’s unanimous opinion reversing the appeals court, holding that the Sixth Circuit erred by analyzing only a limited class of manual tasks associated with Ms. Williams’ job. The appeals court should have asked whether Williams’ impairments restricted her from performing manual tasks that are of central importance to most people’s daily lives. The Court found that occupation-specific manual tasks may have only limited relevance if they are not an important part of most people’s daily lives. In this case, the Sixth Circuit should not have disregarded Williams’ ability to do other manual tasks of central importance, such as household chores, bathing, and brushing her teeth.

The ADA defines disability as a physical or mental impairment “that substantially limits one or more of the major life activities” of an individual. Justice

O’Connor briefly reviewed the sources for interpreting the ADA’s definition of disability, drawing from the regulations from the Rehabilitation Act of 1973 and the Equal Employment Opportunity Commission (EEOC) regulations interpreting the ADA. Although these regulations provide some guidance, Justice O’Connor noted that “the persuasive authority of the EEOC regulations is less clear. . . . No agency has been given authority to issue regulations interpreting the term ‘disability’ in the ADA” (Ref. 1, p 192) However, these regulations are silent on the main issue of Williams’ claim: what a plaintiff must demonstrate to establish a substantial limitation in the specific major life activity of performing manual tasks.

Looking to leading dictionary definitions of key terms such as “substantial” and “major,” Justice O’Connor concluded:

To be substantially limited in performing manual tasks, an individual must have an impairment that prevents or severely restricts the individual from doing activities that are of central importance to most people’s daily lives. The impairment’s impact must also be permanent or long-term [Ref. 1, p 196].

She argued that the terms must be interpreted strictly by a “demanding standard,” noting that when Congress enacted the ADA, it estimated that 43 million Americans have one or more physical or mental disabilities. Justice O’Connor pointed out:

If Congress intended everyone with a physical impairment that precluded the performance of some isolated, unimportant or particularly difficult manual tasks to qualify as disabled, the number of disabled Americans would surely have been higher [Ref. 1, 195].

She emphasized that it is insufficient merely to demonstrate a medical diagnosis of an impairment. There must be a case-by-case assessment of the effect of that impairment on the individual’s life, especially for impairments (such as carpal tunnel syndrome) in which symptoms can vary widely from person to person.

Justice O’Connor concluded that the appeals court reasoned by an incorrect standard, misinterpreting the Court’s prior ruling in *Sutton v. United Airlines*,⁵ that a “class” of manual activities must be involved, for an impairment to limit substantially that major life activity. She clarified that *Sutton* was only talking about “a broad class of jobs” when the major life activity under consideration is that of working. It did not speak to the issue of a class-based analysis for major life activities other than working. Of particular interest, Justice O’Connor went one

step further to note “the conceptual difficulties inherent in the argument that working could be a major life activity,” but concluded, “We need not decide this difficult question today.” Guided by this clarification, she described the error of the appeals court’s focus on manual tasks associated only with Williams’ job.

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 [Ref. 1, p 198].

Otherwise, the *Sutton* analysis would be “meaningless” because an inability to perform a specific job could always be recast as an inability to perform a “class of tasks associated with that specific job.”

In emphasizing the need to analyze impairment outside the workplace, Justice O’Connor underscored that the ADA defines disability not only in employment, but also in other areas, such as public transportation and privately provided public accommodations. This “demonstrates that the definition is intended to cover individuals with disabling impairments regardless of whether the individuals have any connection to a workplace” (Ref. 1, p 199). Noting that the manual tasks unique to any particular job are not necessarily important parts of most people’s lives, the court must look at a broader analysis of impairment in manual tasks. In this case, the appeals court

...disregarded the very type of evidence that it should have focused upon. . .household chores, bathing, and brushing one’s teeth are among the types of manual tasks of central importance to people’s daily lives, and should have been part of the assessment of whether respondent was substantially limited in performing tasks [Ref. 1, p 200].

Given this perspective, Justice O’Connor concluded that the evidence did not support the Sixth Circuit’s grant of partial summary judgment regarding disability and reversed and remanded for further proceedings consistent with this opinion.

Discussion

Since the enactment of the ADA in 1990, the judiciary has wrestled with several issues to clarify the scope and nature of its protections.⁶ Beginning in 1999 with *Sutton* and *Albertsons v. Kirkingburg*,⁷ the Supreme Court has narrowed the disability definitions of “substantial limitation” and “major life activity.”⁸ *Toyota* continues in this trend toward narrower applicability, along with two other 2002 cases:

*U.S. Airways v. Barnett*⁹ (ADA accommodation does not necessarily trump seniority rules), and *Chevron USA v. Echazabal*¹⁰ (ADA does not require allowing an employee to continue in a job that directly poses a threat to his or her health and safety). The Court is establishing a less expansive vision of the ADA, particularly as it pertains to employment.

Beyond the clearer definitions of substantial limitation and major life activity, *Toyota* suggests the Court’s concern and skepticism about several related issues that may further limit the ADA’s applicability and interpretation in future cases. Justice O’Connor alerts the lower courts that the EEOC regulations (often regarded as promoting the employment rights of the disabled) might be given less deference and have “less clear. . .persuasive authority” with regard to the ADA’s definition of disability. *Toyota* raises the question of “the conceptual difficulties inherent” in the conclusion that working itself should be considered a “major life activity.” Working at specific job functions requiring certain manual tasks is now not a “major life activity” by itself. If working in general is also removed from that definition in future cases, it would certainly be seen as a further significant narrowing of disability employment rights under ADA. Finally, Justice O’Connor reminds the lower courts that the mere medical diagnosis of an impairment is not enough. The claimant must provide evidence that will prove that the impairment substantially limits a major life activity—again, by the more stringent definitions noted in *Toyota*.

However, the Court’s decisions suggest that once claimants meet these more stringent definitions, they are entitled to appropriate accommodations and remedies. In *Bragdon v. Abbott*¹¹ (a woman with asymptomatic human immunodeficiency virus [HIV] met ADA definition of disability), the Court considered reproduction to be a major life activity entitled to ADA protection. In *Toyota*, the Court appears to include personal hygiene and household chores as manual tasks associated with a major life activity. Finally, the Court emphasizes the individualized assessment of disability on a case-by-case basis, looking not merely at the diagnosis but at how the symptoms affect the individual. From a psychiatric perspective, this comports with common clinical experience recognizing that disabling impairment is not merely a matter of DSM diagnosis, but of symptom severity and functional impact.

One thing is certain: there will be cases during the next several years at all levels of the federal judiciary that continue to grapple with ADA and other disability questions, clarifying and codifying the scope and nature of the protections offered to disabled claimants. Among the issues currently arising at the district court level is the distinction between physical and mental illnesses as it relates to disability insurance benefits (e.g., see *Fitts v. FNMA*,¹² arguing that bipolar disorder is a biological illness that should not be subject to an “ambiguous” mental health two year benefit limit.) It will be interesting to see whether (and how) the Supreme Court tackles that question.

References

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