

Flashpoints In Focus: Handling Religious Objections To AI Use

By **Dawn Solowey, Michael Steinberg and Angelina Evans** (June 26, 2026)

This article is part of a monthly column that examines polarizing social, cultural or political issues that affect workplace legal considerations. In this installment, we discuss how to manage employee requests for religious exemptions from artificial intelligence while mitigating legal risk.

Pope Leo XIV warned about artificial intelligence in his May 15 encyclical, repeatedly analogizing it to the Tower of Babel.[1] And the Catholic church is not alone; various institutions have put out statements or materials addressing the challenges presented by AI, including other Christian, Jewish and Muslim groups.[2] These developments may add fuel to an emerging trend of employees requesting religious exemptions from workplace use of AI.

Given the explosion of AI in workplaces in nearly every industry, the rising tide of religious objections is perhaps unsurprising. Employers are using AI for hiring, training, performance management and productivity monitoring. Use of AI has accelerated to touch nearly every industry and workplace function.

In this piece, we discuss the nature of the alleged religious objections to AI, and share best practices for employers handling these novel requests.

Religious Objections to AI

The pope's warning letter points to one set of possible religious objections to AI. The encyclical refers to the Bible story about the Tower of Babel, in which people speaking a single language tried to build a tower to reach heaven, until God confused their language and scattered them across the earth.

The encyclical counsels that we must avoid "'Babel syndrome,' namely the idolatry of profit that sacrifices the weak," and the pretense that a single digital language "can translate everything, including the mystery of the person, into data and performance." In even more pointed language, the encyclical warns that in the AI era, "human dignity is threatened by new forms of dehumanization."

It is expected that certain employees will cite these themes, or the language itself, in requests for accommodation, notwithstanding that the pope's encyclical can be interpreted not as an objection to the technology itself, but as an ethical and moral framework for its use at the individual and societal level.

Other employees may cite a religious belief regarding the role of humanity in creation, and that AI is a perceived threat to that role. Others may believe that to prioritize AI over faith is to engage in impermissible idolatry. Still others may attempt to claim that the use of AI is the "mark of the beast," a belief that is based on a passage in the Book of Revelation that has been invoked to support alleged religious objections to the use of biometric scanners



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and vaccines.

Other objections may be framed as religious beliefs, but intersect significantly with secular or political concerns, such as those about the environmental impact or increased poverty resulting from AI-caused job elimination.

Secular Objections to AI

Earlier this year, an NBC News poll showed that Americans are deeply concerned about AI for a variety of nonreligious reasons as well.[3]

Specifically, several Pew Research Center surveys have found that people tend to express concern about its effect on creative thinking and relationships, and are pessimistic about its implications for education and jobs.[4] In one such survey, more than half of people said they wanted more control over AI's use in their lives.[5]

Whether an Objection Is a Sincere Religious Conflict

When an employee requests religious accommodations regarding AI, the first question is whether the employee can identify a sincere religious conflict with AI.

In general, U.S. Equal Employment Opportunity Commission guidance instructs employers to assume that an asserted belief is sincere, absent objective evidence to the contrary, in which case the employer can make a reasonable inquiry to assess sincerity.[6]

For example, if an employee lodges a purely secular objection to the use of AI — citing the learning curve involved in using it — is later told that using the technology is required, and then cites a religious objection, there may be grounds for further inquiry on sincerity.

Whether an objection is religious in nature, in contrast to a secular objection or personal preference, can be tricky to decipher. If a request contains a mix of both religious and secular reasoning, the conservative approach is for the employer to treat the request as one seeking an accommodation for religious beliefs or practices, notwithstanding the presence of secular rationales alongside religious ones.

The next question is whether the employee has identified a sincere religious conflict with using AI in the workplace. For example, if an employee's accommodation request rests on an incorrect factual assumption about how the AI is utilized, there may be no actual conflict.

To probe these questions, the employer can use a written religious accommodation request form or devise talking points to guide a verbal conversation. That dialogue should be respectful, not dismissive, of the alleged religious belief — even if it seems unusual or outlandish.

In an ironic twist, employees who might have looked to the internet to get religious exemption language a few years ago, are now using AI to draft requests. This highlights the importance of having an interactive process, so the employer can hear the employee's own explanation of their beliefs. Of course, if an employee who is requesting an exemption from AI use is, in fact, using AI to write the exemption, that could be an apparent contradiction to explore.

Understanding the Scope of the Request

It is also important for the employer to ask practical questions about the scope of the request. For instance, is the employee's request limited to their own use of AI, or do they seek to curtail its use by others or even the institution as a whole? And for what duration of time is the employee making the request?

Further, what specific accommodation is being requested — is the employee focused on a particular use of AI or all uses, even when AI is running in the background? For instance, is the employee asking for permission to refrain from using Microsoft Copilot at work, or objecting to intersecting with any work product that utilizes AI at all?

Given how ubiquitous AI is in many workplaces, the employer will want to understand how narrow or broad the request is.

Parsing Reasonable Accommodation From Undue Hardship

If an employee has presented a sincere religious conflict with a particular use of AI, then the employer must engage in an interactive process to determine whether it can provide a reasonable accommodation without undue hardship.

The U.S. Supreme Court's 2023 decision in *Groff v. DeJoy* defined undue hardship as "substantial increased costs in relation to the conduct of its particular business."^[7] When it comes to AI, the challenge is determining what is a reasonable accommodation and what is a substantial increased cost. To some extent, this will depend on the scope of the request.

For example, suppose that a marketing representative works in a department that encourages using AI to generate marketing materials. If the marketing representative requests an exemption from that practice, it is possible that the company can reasonably allow the representative to use other methods to generate materials.

However, if others in the department are using AI to generate materials, it may become impractical, or even impossible, to completely segregate the AI-generated material from the requesting employee, and a request seeking such an accommodation may be unreasonable and present an undue hardship.

Similarly, if part of the requesting employee's role is to republish marketing materials that others have generated — and those employees do use AI — it may not be reasonable for the requesting employee to avoid those central duties.

Further, if AI makes a particular task vastly more efficient, it may be unreasonable to permit the employee to do the task unaided by AI. For example, it may not be reasonable for a corporate paralegal to summarize corporate filings without the assistance of AI if doing so would take four times as long.

Moreover, external realities may make exemptions from AI use problematic. Customers and clients may have particular expectations regarding a company's use of AI, which may give rise to significant adverse business impacts from granting an exemption. Or an employer may be subject to contractual obligations about AI use that constrain its ability to exempt employees from using it.

When considering denying a religious exemption from AI on undue hardship grounds, the employer should ensure that it can prove that the exemption would create substantial

additional costs — whether economic or operational.

For example, if a sales team uses a particular AI tool for forecasting, it may not be enough to simply say that it would be too inefficient for a particular sales representative to not use the tool. Instead, the best practice would be to attempt to quantify the efficiency loss.

Employers must also be careful to ensure that no employees are quietly opting out of using the tool for nonreligious reasons and not facing any negative repercussions.

Intersecting Employer Obligations

Employers should also take care to mitigate bias in AI hiring tools, and be reasonably consistent in managing both medical and religious accommodation requests. If an employee is exempted from a particular AI application due to a disability, it may be difficult to show that the employer cannot make the same exemption when the request is rooted in religion, all other things being equal.

Duration of the Request

One thing is clear when it comes to AI: The technology is changing rapidly. As a result, employers should be mindful that what is a reasonable accommodation today may no longer be reasonable, and may be an undue hardship, in six months.

Employers would be wise not to guarantee an indefinite accommodation. Rather, state expressly and in writing that the company retains discretion to revisit accommodations periodically as business needs change, and then set up a timetable to check back in and revisit it.

State Laws

In managing requests related to AI and religious accommodations, employers must also be mindful of an increasingly complex regulatory environment, particularly in circumstances where the request is related to the company's use of an AI tool that affects the employee, such as to make employment decisions — as opposed to an employee's request to refrain from using AI tools themselves.

There is a growing patchwork of state laws regulating AI use.[8] Core among these laws are the following key parameters for employers' use of AI tools in connection with employment:

- The use of a tool that results in discrimination against any individual based upon their inclusion in a protected category, including religion, is strictly prohibited.
- Notice and transparency are paramount, so every individual should understand that a tool is in use, and also what — specifically — the tool is being used for.
- Employers must conduct a risk assessment or bias audit prior to implementing the tool, depending on the jurisdiction.

Thus, state laws can, and already do, place limits on employers' use of AI. For example, in certain circumstances in at least one state, California, after providing notice of the tool's use, an employer must also give employees the ability to opt out of using it.[9]

The growing patchwork of state laws in this area has begun to create independently enforceable notice obligations, opportunities to opt out and protections against retaliation.

Employers must remain abreast of these legal developments, not only to ensure compliance, but also because state laws permitting employees to opt out of using employment-related AI tools may have implications for assessing undue hardship in the context of religious exemption requests.

In particular, if an employee objects to the use of an AI tool for religious reasons, the employer should consider whether the employee lives in a jurisdiction in which the law entitles them to opt out of such use. If so, it would be difficult to contend that granting a religious exemption would actually create an undue hardship — as it cannot be an undue hardship to do that which the law already requires.

Conclusion

In the wake of the pope's warnings about AI, employers can expect to see a growing trend toward requests for religious exemptions from workplace AI use.

By engaging in a careful interactive process and being mindful of the web of intersecting state laws, employers can navigate these requests in a manner that is respectful of employees' religious beliefs, while ensuring that they retain flexibility to leverage the new technology for their business mission.

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[1] <https://www.nytimes.com/2026/05/25/us/pope-leo-encyclical-highlights.html?smid=nytcore-ios-share>.

[2] See e.g. Riyadh Charter on Artificial Intelligence for the Islamic World (<https://www.spa.gov.sa/en/N2169973>); Judaism and Artificial Intelligence (https://www.chabad.org/library/article_cdo/aid/6797055/jewish/Judaism-and-Artificial-Intelligence.htm), Ethics & Religious Liberty Commission (<https://www.baptistpress.com/resource-library/news/erlc-releases-practical-guide-addressing-ai/>).

[3] <https://www.nbcnews.com/politics/politics-news/poll-majority-voters-say-risks-ai-outweigh-benefits-rcna262196>.

[4] <https://www.pewresearch.org/short-reads/2026/03/12/key-findings-about-how-americans-view-artificial-intelligence/>.

[5] Id.

[6] https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination#h_9546543277761610748655186.

[7] *Groff v. DeJoy*, 600 U.S. at 470.

[8] See, e.g. Cal. (Eff. 1/1/26, but substantive compliance obligations are phased in on later dates) (On September 23, 2025, the California Privacy Protection Agency (CPPA) finalized regulations that define automated decision-making technology (ADMT) and requests to opt-out of its use. The regs. amend cybersecurity audit requirements and when a risk assessment may be triggered, such as when automated processing is used to infer or extrapolate a consumer's performance at work based upon systematic observations when they are acting in their capacity as a job applicant, employee, or independent contractor for a business (e.g., using emotion-recognition technology without human involvement to review a videotaped interview to make a decision) (Final Regulations); Ill. (Eff. 1/1/26) – Illinois makes it a civil rights violation to use AI with respect to recruitment, hiring, promotion, renewal of employment, selection for training or apprenticeship, discharge, discipline, tenure, or the terms, privileges, or conditions of employment that has the effect of discriminating on the basis of a protected class or to use zip codes as a proxy for protected classes. Employers must provide employees with notice of its use of AI for the above noted reasons. Draft rules have been circulated by third parties but have not been filed in the IL Register. (H.B. 3, 773; Draft Rules (subpart J)); Colo. (Colorado enacted an AI bill that requires private sector employers that use a high-risk artificial intelligence system to (1) take reasonable care to protect consumers from algorithmic discrimination; (2) implement and regularly review a risk management policy and program that meets specified criteria; (3) complete an annual impact assessment; (4) post a statement on its website summarizing its use; and (5) notify consumers if AI is used to make, or is a substantial factor in making, consequential decisions, including providing a purpose statement and an option to opt out of its use. If AI's use results in an adverse decision, employers must provide additional information to the consumer, an opportunity to correct incorrect data, and an appeals process. Employer may be exempt from certain requirements if it has fewer than 50 full-time employees, the AI is trained using outside data, and it discloses certain information to consumers. The bill has a broad definition of "consequential decisions" that may open the door to a range of employment claims. On April 27, 2026, a federal judge stayed enforcement of the law while a lawsuit is pending. (S.B. 205).

[9] Colorado's state law on this issue is stayed pending litigation.