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Interpretations of Tolerance and Implications for Employee Relations’ Professionals

C. W. Von Bergen and Alison V. Wells

This article addresses the topic of tolerance by discussing both traditional (classical) and contemporary (neo-classical) definitions of tolerance and its importance in diversity and multicultural training efforts conducted by employee relations’ professionals. It concludes with a summary that emphasizes tolerance incorporating civility.

"Tolerance is essential in a free society. And tolerance is most meaningful when it’s mutual. It seems to me that the state in its position here has been neither tolerant nor respectful of Mr. Phillips' religious views."

—Supreme Court Justice Anthony Kennedy during oral arguments in the Masterpiece Cakeshop v. Colorado Civil Rights Commission case (December 5, 1017)

Justice Kennedy’s comments were aimed at Colorado’s Civil Rights Commission which determined that Jack Phillips, the religious owner of a bakery who refused to provide creative services (i.e., make a personalized wedding cake) to celebrate a same-sex couple’s marriage because he believes that God designed marriage to be between a man and woman, was in violation of the state’s anti-discrimination laws. Mr. Phillips argued that compelling him to fashion such a cake for a gay couple would violate his Christian views and beliefs about homosexual marriage and his First Amendment right to free speech. This 2012 conflict is now addressed by the U.S. Supreme Court in Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission and the key issue is whether applying Colorado’s public accommodations law to compel the petitioner to design expressions that violate his sincerely held religious beliefs about marriage violates the free speech and/or free exercise clauses of the First Amendment.

This article does not address the specifics of the case, but Justice Kennedy’s use of the term tolerance and what tolerance means in...
contemporary American society and its implications for employee relations' professionals. We address the topic of tolerance by discussing both traditional (classical) and contemporary (neoclassical) definitions of tolerance and its importance in diversity and multicultural training efforts conducted by employee relations' professionals. Finally, we conclude with a summary that emphasizes tolerance incorporating civility, a position that we feel closely aligns with Justice Kennedy's statement above.

TRADITIONAL DEFINITIONS OF TOLERANCE

Although the concept of tolerance is highly esteemed today, its value has not always been appreciated. For example, early Western religious scholars St. Augustine and St. Thomas Aquinas viewed tolerance as a vice that could corrupt society and harm innocent people in part because it would deplete the strength of an individual's deepest convictions. Classic tolerance derives from the term's Latin roots – *tolerare* or *tolerantia* – the first a verb meaning to endure, the second a noun denoting forbearance. Simply put, this definition means to put up with those with whom one disagrees or finds objectionable; to endure and to quietly suffer the discomfort of someone or something unpleasant or disliked. In other words, something repugnant is allowed to exist without significant action on the part of those offended.

Tolerance involves recognition that society must include a willingness to bear with people whose ideas and practices are not merely different, but believed to be wrong or unacceptable. The classical definition of tolerance incorporated the idea that everyone was entitled to their own opinion and that people were to recognize others' beliefs, practices, etc., without necessarily agreeing, sympathizing, or sharing in them, and to bear with someone or something not especially liked. In this view, individuals accept the right of others to hold differing opinions (have different practices, and be different than themselves) – while not accepting their behavior as right for themselves or society. There is an element of grudging forbearance in the classical definition of tolerance.

Oberdiek views tolerance as best captured by the slogans of "Live and let live," "You go your way, I'll go mine," or "To each his own." Classic tolerance simply means the ability to hold on to one's convictions while accepting the right of others to hold on to theirs. Tolerance is not indifference or acquiescence, but recognition of difference. Tolerance has nothing to do with accepting another person's belief.

CONTEMPORARY INTERPRETATIONS OF TOLERANCE

Today tolerance is considered an essential highly desirable quality in U.S. society, and one of its few noncontroversial values. It has risen to
the apex of America's public moral philosophy and is considered a virtue essential for democracy and civilized life. It is considered "indispensable for any decent society - or at least for societies encompassing deeply divergent ways of life" characteristic of many Western cultures. Indeed, Berggren and Nilsson noted that tolerance can be considered a distinguishing feature of Western culture.

Many believe a good, moral person to be tolerant and insist that in a world burdened by injustice, inequality, prejudice, and bigotry, the best solution to address these evils involves greater tolerance. The lexicon of today's tolerance supporters requires accepting and approving others' principles and standards. To argue otherwise invites charges of engaging in "mean-spirited, right-wing polemic endorsing hatefulness." In fact, one of the worst things that could be said of a person today might be that they are intolerant. Such a moniker demonizes those with opposing beliefs and practices as bigoted, myopic, disrespectful, ignorant, abominable, and in league with the KKK. Many consider tolerance so important that museums dedicated to it can be found in Los Angeles and in New York City. There is even an International Day for Tolerance that is observed on November 16 to educate people about the need for tolerance in society.

Nowadays many reject the classical definition of tolerance because it does not go far enough - it is a half measure. What is needed, these critics say, is to move beyond tolerance as classically understood toward a positive appreciation of and an unqualified agreement with differences - a shift from forbearance to acceptance. Lickona believes that contemporary understandings of tolerance involve "the ability to accept the values and beliefs of others" and noted behavioral scientist Barry Schwartz indicated, "I think that most of the time what we have in mind when we speak of tolerance is something closer to 'acceptance,' or even 'celebration.' Acceptance implies approval, and celebration implies enthusiastic approval." Such a view is consistent with the United Nation's (UN) decision to declare 1995, "The Year of Tolerance." In the UN's declaration, tolerance was defined as "respect, acceptance and appreciation of the rich diversity of our world's cultures, our forms of expression and ways of being human. ... It involves the rejection of dogmatism and absolutism...." Moreover, the absence of tolerance may well be considered the root of much vice: hate crimes, religious and political persecution, and terrorism.

The neoclassical interpretation of tolerance requires affirming the rightness of the nontraditional; bearing the objectionable has been replaced by "venerating[ing] the objectionable." It goes beyond respecting a person's right to think and behave differently, and demands that practically every unconventional value claim and personal practice be made morally legitimate. Neo-classical tolerance is immediately suspicious of the idea that something may be offensive, and if it is, rejects the idea that one is free to express such distaste. To evaluate something as questionable, repugnant, or wrong and publicly say so is considered
intolerant, insensitive, and disrespectful. 21 Few ideas or behaviors can be opposed, regardless of how gracious the attempt without inviting charges of being hateful, abusive, or some other caustic and vitriolic attack.

A PROBLEM WITH CONTEMPORARY INTERPRETATIONS OF TOLERANCE

The modern interpretation of tolerance, however, poses a dilemma: how can individuals be asked to accept all people's values and practices when they may believe some of those ideas and behaviors to be incorrect or immoral? How, for example, can one ask supporters on opposite sides of the abortion and gay marriage debates to accept the validity of each other's outlooks? Some champions of compassion and inclusivity and proponents of diverse thoughts and beliefs advocate tolerance for people of all backgrounds, races, and religions yet frequently their actions suggest otherwise.

Nowhere is this unfair application of pluralism exhibited than in universities regarding political beliefs.22 Heterogeneity is a well-established value in the academy, and it enjoys broad backing – except for individuals who do not share the overwhelming liberal political bias in higher education. Individuals who challenge the liberal narrative are often faced by intolerant, uncaring, and sometimes even violent persons. Such was the case with (progressive) biology professor Bret Weinstein at Evergreen State College, a public liberal arts college in Olympia, Washington, who took exception to the university's day of racial segregation (i.e., "Day of Absence") in which all white people were told to stay away from the institution as students, staff, and faculty of color were invited to remain on campus and take part in discussions about racism and other intersectional issues organized by the school's Director of First Peoples Multicultural Advising Services.23 In response to Weinstein's questioning this racial segregation, a group of Evergreen students disrupted a class he was teaching, surrounded him, cursed at him, screamed at him, called him a racist, and demanded that he resign or be fired. This act of moral bullying lead to protests and threats over allegations of racism and intolerance and campus police told Weinstein that for his own physical safety, he should keep away from campus for a few days. Professor Weinstein resigned after receiving a $500,000 settlement from the institution.24

Consider also how Harvard's former president, Lawrence Summers, caused a furor in 2005 by speculating, at a private meeting, that innate gender differences might contribute to the paucity of women in top positions in math, science, and engineering at elite universities. In addition, Dr. Summers questioned how much of a role discrimination plays in the scarcity of female professors in science and engineering at such universities. It seems that even broaching the topic was enough to force
his resignation.\textsuperscript{25} Higher education seems to have created an intellectual monoculture in many disciplines that are unresponsive to those with viewpoints, understandings, and political ideologies not endorsed by the political left.\textsuperscript{26} It has become so pernicious that prominent psychologist, Jonathan Haidt of New York University, has suggested affirmative action for conservative professors.\textsuperscript{27}

This double-standard also happens in business organizations. Those who dare to disagree with others who oppose an understanding of tolerance as an approval of (generally) unconditional liberal-leaning sentiments and perspectives are often considered legalistic individuals with non-negotiable doctrinal convictions, deserving, in some cases, to be terminated from their job. It seems that having firmly-held beliefs inconsistent with politically liberal biases is problematic. Henle and Holger indicated that AT&T representatives seemed to have thought this when they fired Albert Buonanno after he refused to agree to portions of the company’s employee manual that he believed violated his religious beliefs.\textsuperscript{28} At AT&T, all employees were required to sign a written acknowledgment that they had received the firm’s new employee handbook and sign a “Certificate of Understanding.” The certificate contained a statement that the employee signing it “agreed with and accepted” all the terms and provisions of the handbook, including its policies and rules. The booklet contained a provision that “each person at AT&T Broadband is charged with the responsibility to fully recognize, respect and value the differences among all of us,” including “sexual orientation.”\textsuperscript{29} However, Mr. Buonanno’s strongly held religious beliefs regarding the homosexual lifestyle prevented him from approving its practice.

Buonanno shared his concerns with his immediate supervisor and informed him that he had no problem declaring he would not discriminate against or harass people who were different from him, including homosexuals, but that he could not sign the statement because it violated his sincerely held religious beliefs. Mr. Buonanno stated, “As a Christian, I love and appreciate all people regardless of their lifestyle. But I cannot value homosexuality and any different religious beliefs.”\textsuperscript{30} AT&T informed Buonanno that they would terminate him should he refuse to sign the certificate. He declined to sign the document, and AT&T immediately terminated his employment. Mr. Buonanno then sued AT&T, resulting in his winning an award of $146,260.00 in damages.\textsuperscript{31} According to Hudson, employers should not force workers to adopt beliefs inconsistent with their religious beliefs, and “employees shouldn’t be forced to forswear their religious values in the name of tolerance.”\textsuperscript{32}

These examples suggest that certain views are unacceptable and that if one expresses them they could be considered bigoted, ignorant, deplorable, worthy of derision – and could be terminated from a job. A key question becomes, should everyone be required to approve, affirm, and celebrate all beliefs and conduct, even the following, in the name of tolerance?
• Condoms should be available to elementary school children.

• The ancient practice of *sati* (a funeral custom where a widow immolates herself on her husband's pyre) should be reintroduced.

• The Earth is flat rather than an oblate spheroid.

• Today's global warming is due to natural causes not related to human activity.

• Economic inequality is natural and inevitable and beneficial to U.S. society.

While many might find these observations abhorrent, are those who disagree with such statements prejudiced, hateful, bigoted, rigid, and intolerant? We suspect that this is not the case, since not all beliefs, behaviors, or both must be endorsed – only those largely sanctioned by those within the liberal tradition. Both critics and supporters of tolerance indicate that it is central to liberalism.33 Self-proclaimed progressive professor Barry Schwartz noted that "As good liberals in a liberal society – and especially as citizens of that bastion of liberalism, the academy – we value tolerance ... [and] we deeply believe that tolerance is the one virtue of character on which a liberal, pluralistic society most depends."34 Unfortunately, the graciousness implied in the "accept and appreciate differences" brand of tolerance may be selective, with only those residing on the political spectrum's progressive flank deserving approval. For example, while gays and civil rights groups are generally applauded, one often finds silence when it comes to evangelical Christians, first responders, or the military. Such a one-sided interpretation of tolerance as acceptance of primarily liberal viewpoints often engenders the very divisiveness it proposes to eliminate.

Beliefs and conduct not aligned with more liberal leanings are readily dismissed. This was illustrated by Professor Schwartz who once again stated that "It is simply not possible for me to approve of committed anti-abortionists demonstrating outside abortion clinics. And it is simply not possible for me to approve of Jews who won't allow women to see, let alone read from the Torah."35 We agree and feel that there may be issues and beliefs that one should not be forced to approve. Furthermore, we concur with Oberdiek who argued that "It would be unreasonable – worse, utterly wrong – to demand that we should tolerate every divergent belief or practice."36 Philosopher Karl Popper referred to a similar concept in his tolerance paradox which states that if a society is tolerant without limit, then their ability to be tolerant will eventually be seized or destroyed by the intolerant. Popper came to the seemingly ironic conclusion that to maintain a tolerant society, society must be intolerant of intolerance.37
DIVERSITY TRAINING

Vogt believes that nowhere is this growing emphasis on tolerance more evident than in the prominence given it in education and training and development programs addressing issues of multiculturalism, inclusion, and diversity. Indeed, training is one of the most common activities included in diversity initiatives, used in 67 percent of U.S. organizations. This training sells well and has become a fixture of the American workplace and such instructional efforts often involve teaching tolerance and valuing and appreciating differences in appearance, beliefs and attitudes, perspectives, assumptions, lifestyles, and conduct. Trainees are encouraged to applaud differences and to create a culture that entails appreciation, approval, and acceptance of a myriad of dissimilarities despite some authors' warnings that excessive emphasis upon the differences between Americans could produce a Balkanization of U.S. society.

In diversity training workshops, participants are frequently told that everything should be considered different—not better or worse, but equivalent—and that a person's view should automatically be considered wrong if it rejects the equal legitimacy of all views. There is a litany of words and phrases that, like bullets from a machine gun, are shot in rapid fire reflexively to assault the character and motivations (using slander, coercion, and pejorative personal attacks) of those who may question such an understanding of tolerance (see Figure 1). Supporters of tolerance today tell individuals who may question or oppose them that they should ___ (pick one or more of the verbs in Column 1 from Figure 1) others' ___ (pick one or more of the words in Column 2) and that, if they do not, then they are ___ (pick one or more of the words listed in Column 3). For example, an individual may be told that if they disagree with a belief in man-made global warming then they are ignorant, uninformed, and stupid. If someone thinks another is wrong, and dares to say so, they are called intolerant.

TOLERANCE AS CIVILITY

We believe that it is extremely important to preserve a notion of tolerance that is neither “putting up with,” which demands too little of us, nor “celebration of differences,” which demands too much. We offer civility as occupying a middle ground which lies somewhere between classical views of tolerance as suffering the loathsome and neoclassical perspectives of tolerance requiring practically blank-check approval and acceptances of countless differences. This view involves treating people with whom we differ neither with disdain nor appreciation, but with civility, dignity, and courtesy even as we recognize that some conflict and tension is inevitable (see Figure 2). Individuals should be shown basic respect as human beings even if they hold beliefs and/or exercise conduct
that we do not value. Human beings have real dignity simply because they are persons and deserve to be treated by others with respect and consideration.\textsuperscript{43} Similarly, Ury remarked that "tolerance is ... showing respect for the essential humanity in every person."\textsuperscript{44}
Interpretations of Tolerance and Implications

Billante and Saunders\textsuperscript{45} surveyed the literature on civility and suggested three elements that together constitute the term. The first element is respect for others. The second element is civility as public behavior towards strangers. This is akin Carter's view that "civility equips us for everyday life with strangers... We need neither to love them nor to hate them to be civil towards them."\textsuperscript{46} The third element is self-regulation in the sense that it requires empathy by putting one's own immediate self-interests in the context of the larger common good and acting accordingly.

Note that respect is accorded the person. Whether individual's ideas or behavior should be accepted and acclaimed is an entirely different issue. Tolerance requires that each person's viewpoint receives a courteous hearing, not that all views have equal worth, merit, or truth, or that no judgments are allowed. The view that no person's beliefs may be any better than another's can be considered irrational and absurd. Rejecting, questioning, or requiring a neutral posture towards another's convictions should not be equated with disrespect for the person. It would be inappropriate to tolerate such things as racism, sexism, or hate speech. This view is consistent with renowned psychotherapist Albert Ellis' view of unconditional other-acceptance, which declares that one is not required to "tolerate the antisocial and sabotaging actions of other people.... But you always accept them, their personhood, and you never damn their total selves. You tolerate their humanity while disagreeing with some of their actions."\textsuperscript{47} Ellis' observation is also in agreement with the Kantian perspective that "human beings are to be regarded as worthy of respect as human beings, regardless of how their values differ and whether we disapprove of what they do."\textsuperscript{48} Simply because of their humanity, all people qualify for a status of dignity.

Tolerance as advocated here incorporates civility and involves treating others with respect and dignity without necessarily agreeing with or accepting their values, practices, or the importance of these practices to the way of life of the people who engage in them. Key components of tolerance construed as incorporating a large dose of civility include dialogue and openness to others. The richest form of civil dialogue should not be construed as merely an exchange of information, but rather a process in which the participants actively question their own perspectives and include others as partners in their cultural self-exploration and learning.\textsuperscript{49} Dialogue involves (1) self-exploration, as much as learning about the other, and (2) the articulation of one's own previously implicit values and assumptions, as much as learning what might be valued by others. This type of exchange can lead to greater self-understanding as well as a thoughtful consideration of others' perspectives. It can also help one recognize and begin to address inconsistencies, tensions, and blind spots in one's own thinking. At its best, dialogue can be challenging and enriching, and can result in greater clarity about, and sometimes alterations in, one's own worldview. Such dialogue introduces profound possibilities for self-examination and transformation in ways that members of diverse groups understand: what might be good for them, what might be praiseworthy, and how to bring that goodness into being.
Interpretations of Tolerance and Implications

Of course, some may hold certain beliefs or practices that are so unacceptable or objectionable that others who do not share those beliefs cannot engage with those who keep them. Stephen Covey, in his wildly popular text, *The 7 Habits of Highly Effective People*, referred to a similar concept when he suggested that people should “seek first to understand, then to be understood.”50 This is like empathy and can be intended to improve communication by suggesting that individuals listen with the intent to understand others’ perspectives; not listen solely with the intent to reply.

Tolerance as civility allows differing views to have an equal right to exist, although not necessarily to have an equal share in truth. These are different issues. Indeed, the view that all values are equal and immune from criticism might be intolerant of the belief that moral judgments can be made. Tolerance suggesting civility does not excuse individuals from resolving conflicting claims to truth. Tolerance comprising courteousness recognizes the rights of others to both have and express their opinion. If individuals can learn to respect the rights of all human beings to have and express their understanding of reality, whether they agree with them or not, then everyone will be one step closer to living in a truly charitable world. People can respect those who hold different beliefs by treating them politely and allowing their views a place in community discourse.

Tolerance as civility does not mean accepting another person's belief; only his or her right to have that belief. It is like the famous words (some say falsely) attributed to Voltaire: “I detest what you write, but I would give my life to make it possible for you to continue to write.”51 We can strongly disagree with others' ideas or conduct and forcefully oppose them in the public square, but we still must show respect for individuals despite those differences. People should be inclusive of others, but they should not be required to accept others' beliefs or hypotheses nor approve their behaviors or practices. Persons should listen to and learn from everyone, but not feel obligated to agree with every person, accept their viewpoints, or approve of their conduct. There can be harmony without conformity and it can be considered a disservice to all when believing that tolerance, respect, charity, and dignity imply never saying or doing anything that might upset someone. Barrow goes so far as to say that protesting that one is being offended by another's interpretation is “one of the supreme self-serving acts,” and “that taking offence, when it means treating one's personal hurt as grounds for punitive response, involves a refusal to show tolerance, to allow freedom or to play fair – for why should you be allowed to say what you want, when others are denied that right by you?”52

Good people will sincerely disagree, and the issues that divide them by their very nature impassion them. Individuals can, however, disagree without demonizing those with whom they differ. In civility, persons affirm the dignity and essential worth of others even when they express ideas deemed flawed, incorrect, or wrong. It is understood that compromise solutions or common ground cannot be found for all issues, but
that does not justify engaging in the harsh, vilifying, and over-the-top rhetoric often seen today. It is through the clash of conflicting ideas and opinions that insights into truth may be gained. Even erroneous views, in the act of their being challenged, can contribute to the overall clarity of public life.53

IMPLICATIONS FOR EMPLOYEE RELATIONS’ PROFESSIONALS

Weissberg suggests that those attending diversity workshops that encourage tolerance should respectfully engage trainers regarding their definition of the term and question interpretations that imply that participants should appreciate, affirm, approve, and celebrate all differences and “accept everything.”54 Similarly, trainers and instructors should make clear to participants their understandings and perspectives about tolerance. We believe an interpretation of tolerance that means treating people with respect and without malice while not requiring approval and acceptance of all differences in beliefs and conduct will prove helpful and beneficial. Such an understanding of tolerance, what we refer to as tolerance as civility here, can enhance diversity training program effectiveness and can be a valuable approach to addressing inclusion in organizations and institutions. Tolerating or respecting people, however, must never be confused with accepting and endorsing all their ideas and practices.

Not only is civility an important interpersonal value in the workplace, but it is also a meaningful predictor of organizational performance.55 Subtle mistreatment characteristics of incivility have been shown to negatively impact job satisfaction, job withdrawal, career salience, psychological distress,56 and self-reported physical health problems.57 King et al. observed that firms can improve performance by creating and maintaining norms of civility.58 Training programs and leadership activities may help employees overcome their (often unconscious) behavioral tendencies to disfavor out-group members by encouraging – indeed demanding – civility in all interactions. Given the resistance and backlash that sometimes arise in response to terms such as “diversity,” “inclusion,” “pluralism,” and “discrimination,” it is possible that focusing on civility instead could improve the efficacy of existing multicultural training programs. Some research suggests that addressing respect and courtesy, incorporating empathy or perspective taking skills,59 and reciprocity60 may be effective in enhancing civility.

SUMMARY AND CONCLUSION

Tolerance historically meant that persons must be willing to “put up with” and suffer others’ opinions and conduct that they found distasteful.
Interpretations of Tolerance and Implications

Today, however, tolerance increasingly means not only approving those views and behaviors with which one may disagree and find objectionable, but also accepting and celebrating them. Nonetheless, we question the "tolerance-as-acceptance" rhetoric imposed on the public today.

Tolerance must incorporate respect and dignity for everyone. Individuals can be tolerant without the requirement to adopt others' thinking or convictions. Inclusiveness should not demand that differences be denied or proscribed. Tolerance as endorsed here emphasizes respect and civility for persons, since every individual possesses inherent value. It does not, however, require embracing another's belief; only affirming his or her right to have that belief. Tolerance as civility entails no obligation to esteem others' conduct or ways of life as morally informed, nor does it decree that individuals be silent about their differences. Tolerance interpreted as civility does, however, strongly encourage everyone to explore the terrain between endurance and acceptance, and finding possibilities of mutual understanding and change along the way.

We advocate civility toward others with whom we disagree – a civility that includes courtesy toward others and the approval of them as a basic object of moral concern. Civility permits conflict and criticism of others' beliefs and practices, but it limits the ways in which such disagreement can be pursued. For criticism to be civil, it cannot be blind, based on stereotypes or debasing opposing viewpoints, but rather requires knowledge and basic concern for the identity and voice of others.

This approach corresponds to various presidential appeals for civility. As a teen, George Washington copied into a school workbook "110 Rules of Civility & Decent Behavior in Company and Conversation." The first of Washington's rules of civility said, "Every action done in company ought to be done with some sign of respect to those that are present." President George H. W. Bush, in a commencement address at the University of Michigan in 1991, indicated that "We must conquer the temptation to assign bad motives to people who disagree with us," and in 2009, amid much public controversy and protest demonstrations, President Obama delivered the commencement address at Notre Dame University. Some thought that Mr. Obama should not be invited to speak at a Catholic university because his "pro-choice" position on abortion contradicts church doctrine. He devoted a section of his address to the protests – not on the merits of one abortion position over another – but rather on public discourse; that is, on how Americans should engage in public debate on issues with which they fundamentally disagree. Mr. Obama observed that while opposing views would and should be presented with passion and conviction, they could be done "without reducing those with differing views to caricature." Then he suggested a model: "Open hearts. Open minds. Fair-minded words" in the context of "... friendship, civility, hospitality and especially love." These presidential words are remarkably consistent with the interpretation of tolerance as civility suggested here. We promote tolerance – but understood as civility, a view most probably sanctioned by
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Justice Kennedy. We support the idea of a truly pluralistic society, in which differing views have an equal and legal right to exist, but not a society in which ideologically driven interest groups require all to accept their worldviews, where disagreement is often misconstrued as bigotry, stupidity, and hatred, and where tolerance simply means required acceptance and approval. In closing, we are reminded of the words of noted English philosopher, William Rowe, who said: "... those who are most eloquent in demanding freedom for their own views and practices are the first to deny freedom of thought or action to their neighbors."65

NOTES


3. Supra, n.1.


10. Supra, n.8 at 23.


13. Supra, n.5, at xi.

14. Supra, n.8.

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18. Id. at 1.3.

19. Supra, n.15.

20. Supra, n.5, at 126.


30. Id.


32. Kris Hudson, "Diversity Suit Loss or Cable Titan," The Denver Post, April 6, 2004, at 1c.


34. Supra, n.16, at 24.

35. Supra, n.16, at 28.

36. Supra, n.8, at 4.
54. Supra, n.5, at x.
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58. Supra, n.57.


64. Id.