

## **Purpose**

The City of Highland Park believes that the suppression of the COVID-19 virus is a priority for the health, safety and welfare of employees, residents, and visitors of the City. The vaccination of municipal employees and officials against the COVID-19 virus will protect employees, residents and visitors and will allow for the continuation of municipal services.

This policy is intended to follow all applicable laws and is based upon guidance provided by the Centers for Disease Control and Prevention (CDC) and public health authorities, as applicable.

## **Scope**

All employees of the City of Highland Park must receive a COVID-19 vaccine or receive an approved accommodation. Newly hired employees will be required to supply proof of immunization or receive an approved accommodation during the post-offer screening process.

Employees must be considered fully vaccinated as defined by the CDC or receive an approved accommodation no later than November 12, 2021. In addition employees covered by Governor Pritzker's Executive Order 2021-22, must receive their first vaccine dose no later than September 19, and must receive their second dose of a two-dose vaccine within 30 days of receiving the first dose.

## **Procedure**

### *Vaccination*

Employees should see the Human Resources Division of the City Manager's Office for a list of locations to aid employees in receiving vaccines on their own or contact the Lake County Public Health Department to obtain information about vaccination sites. Employees may also be able to obtain vaccine availability information from their own health care providers.

All employees will be granted paid time off work to receive their vaccination(s). Employees must work with their Supervisor to schedule proper time to obtain the COVID-19 vaccine.

### *Reporting*

To be compliant with this policy, employees must do one of the following:

- Provide Human Resources with proof of immunization. Proof of immunization must include a copy of documentation showing the vaccine was received, but should not include any personal health information or family medical history information. A copy of the Employee's CDC Vaccination card is acceptable;
- or
- Comply with the designated procedure for obtaining a permissible accommodation as described in this policy.

## **Confidentiality**

Confidentiality is important to us. The City of Highland Park will not:

- use any genetic information, disability status or information regarding religious beliefs to disadvantage its employees in any way;
- use incentives in exchange for genetic information, information regarding an employee's health condition or that of their family, or information on the employee's religious beliefs; or
- try to coerce employees into supplying health/genetic/religious belief information or taking medical examinations.

Key staff within each Department will have limited access to information in order to check compliance. Records documenting vaccinations and accommodations will be maintained by Human Resources. All information received under this policy will be kept confidential to the greatest extent possible. Sharing of information shall be based on a need-to-know basis and only to the level required to notify management personnel regarding those employees who are not in compliance with this policy or have received an accommodation.

## **Accommodation**

Employees may request an accommodation with respect to the mandatory COVID-19 vaccine policy by submitting an accommodation request form, as outlined below, for: 1) disability/medical contraindications or precautions, or 2) a sincerely held religious belief. All employees should note that personal and/or philosophical objections to vaccinations are not considered sufficient justification for granting an accommodation from the mandatory COVID-19 vaccine program. The City is not required to grant accommodations that would create an undue burden, nor is the City required to grant accommodations that create a direct threat to the health and safety of the employee or others.

Employees requesting accommodations from the required COVID-19 vaccine program due to a disability/medical contradiction/precaution or sincerely held religious belief must submit an accommodation request form to Human Resources.

The following instructions should be followed, depending on type of accommodation requested:

- **Disability/Medical Accommodation:** If an employee has a disability and/or medical condition that presents a contraindication to receiving a COVID-19 vaccine, they must complete the medical accommodation request form and attach the relevant supporting medical documentation from their licensed treating provider as shown in the medical accommodation form.
- **Religious Accommodation:** If an employee wishes to decline a COVID-19 vaccine because it conflicts with a sincerely held religious belief, the employee must complete the religious accommodation request form. Employees may be asked to supply documentation that explains the specific faith-based teachings that oppose immunizations.

The City will engage in an interactive dialogue with all employees requesting an accommodation to determine if there is a reasonable accommodation that can be provided. Accommodations will not be provided if they would result in undue hardship to the City of Highland Park or pose a direct threat to the health and/or safety of others in the workplace and/or to the requesting employee. Human Resources will notify the employee and manager of the decision about an accommodation request.

All employees receiving an accommodation are responsible for understanding and accepting the consequences of the accommodation, which may include required work restrictions. If an employee is granted an accommodation from the mandatory vaccination requirement of this Policy, the City of Highland Park reserves the right to require that, as part of the reasonable accommodation, the employee take precautions to minimize the spread of COVID-19 until applicable authorities determine that the ongoing pandemic has ceased, which may include but not be limited to mandatory regular COVID-19 testing, maintaining social distance, using personal protective equipment (PPE) in the workplace, moving workstations, temporary reassignment, and other similar measures necessary to enhance the safety of the workplace.

After engaging in the interactive process, if the City of Highland Park is unable to provide a reasonable accommodation without causing undue hardship, the employee has one (1) week from notification of the denial of the accommodation to receive their first vaccine dose. Employees must be fully vaccinated, as defined by CDC guidelines, within forty-five (45) days of the denial. Employees covered by the Governor's Executive Order must be tested on a weekly basis until they are fully vaccinated, in compliance with that Order.

The City of Highland Park will only reconsider a denial if the employee supplies new information supporting their request. For reconsideration of a denial, please contact Human Resources.

No employee requesting an accommodation under the mandatory COVID-19 vaccine policy will be discriminated, harassed, or retaliated against for making such a request or being granted an accommodation. If an employee believes that they have been treated in a manner contrary to this policy, please notify the Human Resources Manager immediately.

## **Considerations**

As part of this policy, if a fully vaccinated employee tests positive for COVID-19, commonly known as a "breakthrough case", the City will not require the employee to use their accrued time off while recovering from the breakthrough case of COVID-19 for their regularly scheduled work days for a two week period (14 consecutive calendar days). Fully vaccinated part-time employees are eligible for up to two weeks of pay (based on the average hours worked over the last six (6) completed pay periods). This consideration is only available should the fully vaccinated employee (not a family member or close contact) test positive for COVID-19. This consideration is available through December 31, 2022.

**Consequences of Non-Compliance**

All employees shall be aware that compliance is a condition of employment and/or access to non-public City of Highland Park facilities. Employees who do not certify that they have received the COVID-19 vaccine or have an approved accommodation will not have access to non-public City facilities.

Employees not in compliance with this policy will be placed on unpaid leave until a decision is made regarding their employment status. Employees who have not submitted proof of vaccination or received an approved accommodation may be subject to disciplinary action, up to and including termination.

**Right to Change or Terminate Policy**

The City Manager may change, suspend, or revoke all or parts of this policy at any time, including, but not limited to if vaccine shortages occur and/or if the CDC or public health authorities' recommendations are altered.

Please direct any questions regarding this policy to Human Resources.

## Frequently Asked Questions (FAQs)

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### **1. What do I need to show to prove my vaccination status?**

A copy of your CDC COVID-19 Vaccination Record Card, a printout from the State of Illinois Vax Verify portal, or documentation from your medical provider which shows your COVID-19 vaccination record are all acceptable documentation.

Please do not provide any documentation that includes personal health information or family medical history information.

### **2. Will the City collect or retain any additional health information under this policy?**

No, the City is not requesting, collecting, or retaining additional health information other than vaccination status. Individuals who request a medical accommodation may be required to provide additional information as a component of the interactive process, however any information received will be held in confidence to the greatest extent possible by Human Resources.

### **3. I recently had COVID-19, can I provide proof of recent diagnosis rather than vaccination?**

All individuals must either provide documentation showing vaccination or request an accommodation.

For most individuals who have recovered from COVID-19, the CDC currently recommends being vaccinated against COVID-19 as soon as you are out of quarantine. A recent COVID-19 diagnosis will not be accepted in place of vaccination under this policy.

However, the current recommendation for individuals who received monoclonal antibodies as part of their treatment is to wait 90 days after recovering from COVID-19 before receiving the vaccine to ensure a strong immune response.

Employees who fall into either of these categories should submit a request for a medical accommodation for consideration.

### **4. I have heard that the CDC plans to implement a booster shot program beginning this fall. Will the booster shots fall under this policy?**

To be in compliance with this Policy, employees must demonstrate full vaccination against COVID-19 as defined by the CDC. Should the CDC update its guidance for “full vaccination” to include a booster shot, then booster shots would be required.

### **5. If I have a reaction to the COVID-19 vaccine and need to miss work,**

**will I need to use sick leave or other benefit time?**

Yes. Additional benefit time is not being extended for adverse reactions to the vaccine. It is recommended that employees schedule their vaccine ahead of their days off to ensure time for rest and recovery, if needed.

**6. If I am considered a close contact of someone who tests positive for COVID-19 (such as someone I live with) will I need to use sick leave or other benefit time?**

Possibly. Under the current guidance from public health authorities, individuals who are fully vaccinated and are not symptomatic do not need to isolate or quarantine and therefore do not need to miss any time away from work. Should an individual in this situation choose to stay home, they will need to use benefit time.

Individuals who are considered a close contact of someone who tests positive for COVID-19 and are symptomatic should stay home and be tested as recommended by public health authorities. If you do not test positive for COVID-19, sick leave or benefit time will need to be used. If you do test positive for COVID-19 and are fully vaccinated then the considerations under this Policy will apply. Individuals who are not fully vaccinated and received a medical or religious exemption sick leave or other benefit time will need to be used for time away from work.

**7. What happens if I do not want to be vaccinated?**

If you cannot be vaccinated due to disability/medical contraindications or precautions and/or do not wish to be vaccinated because it conflicts with a sincerely held religious belief, you should submit the appropriate request for accommodation. The City will engage in an interactive process with you to determine if the City can accommodate your request. Each request will be reviewed on a case-by-case basis and a determination will be made based on the unique circumstances of each situation.

Please be aware that personal and/or philosophical objections to vaccinations are not considered sufficient justification for granting an accommodation from the mandatory COVID-19 vaccine program.

If an accommodations cannot be granted, or you do not qualify for an accommodation, you will be placed on unpaid leave until a decision is made regarding your employment status. You may be subject to disciplinary action, up to and including termination of employment.

**8. If my medical or religious accommodation is granted, what other requirements will I need to meet?**

Each situation will be individually reviewed, and requirements may vary depending upon the work performed. Potential precautions required may include, but not be limited to mandatory regular COVID-19 testing, maintaining social distance, using personal protective equipment (PPE) in the workplace, moving workstations, temporary reassignment, and other similar measures necessary to enhance the safety of the workplace.

**9. I still have questions, who should I ask?**

Please reach out to Human Resources with any questions.