

OAK PARK TOWNSHIP – MANDATORY COVID-19 POLICY

DRAFT 09/14/2021

Purpose

Oak Park Township recognizes its responsibility to provide an environment that is safe for all who access our facilities. This Mandatory COVID-19 Vaccination Policy (the “Policy”) is intended to maximize the protection afforded by the COVID-19 vaccine to the officials, agents, and employees of Oak Park Township (the “Township”), as well as the public and patrons of Township services, during the ongoing COVID-19 pandemic. This policy is intended to follow all state and local laws. It is based upon guidance provided by the Centers for Disease Control and Prevention (CDC) and public health authorities, as applicable.

Policy

Employees must have, at a minimum, the first of a two-dose COVID-19 vaccine series or a single-dose COVID-19 vaccine as of the Effective Date of the Policy and must be fully vaccinated against COVID-19 within 30 days following administration of their first dose in a two-dose vaccination series. New employees who begin their work or association with the Township after the Effective Date shall be fully vaccinated against COVID-19 or undergo the Testing Requirements prescribed by Section III of the Policy.

“Fully vaccinated against COVID-19” shall mean two (2) weeks after receiving the second dose of the vaccine in a two-dose series of a COVID-19 authorized for emergency use, licensed, or otherwise approved by the U.S. Food and Drug Administration, or two weeks after receiving a single-dose COVID-19 vaccine authorized for emergency use, licensed, or otherwise approved by the U.S. Food and Drug Administration.

Procedure

Vaccinations

Staff members should contact their appropriate Public Health Department to obtain vaccination updates and information about vaccination sites:

- [Chicago Department of Public Health](#)
- [Cook County Department of Public Health](#)
- [Oak Park Department of Public Health](#)

Staff members may also be able to obtain vaccine availability information from their health care providers. Vaccinations should be run through staff members’ health insurance where applicable or otherwise submitted for reimbursement to Kim Henry, Operations Manager, if there is a cost.

All staff members will be granted paid time off work to receive their vaccination(s) and recover from any adverse reactions caused by receiving the vaccine as needed. Staff members are to work with their managers when scheduling a time to obtain the

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COVID-19 vaccine. To be compliant with this requirement, staff members must do one of the following:

- Provide the Township with proof of immunization within the specified timeframe. Proof of immunization must include a copy of documentation showing the vaccine was received, but it should not include any personal health information or family medical history information; or
- Comply with the designated procedure for obtaining a permissible exemption as described in this policy.

Testing

As of the Effective Date, in order to enter or work on the Township's premises, employees who have not been fully vaccinated against COVID-19 must undergo testing for COVID-19, as described below, until they establish that they are fully vaccinated against COVID-19.

Employees who are not fully vaccinated against COVID-19 must be tested for COVID-19 weekly, at a minimum, and must supply the Township with proof of a negative test after each such test. Testing for employees who are not fully vaccinated must be done using a PCR Test (polymerase chain reaction) that either has Emergency Use Authorization by the FDA or is operated per the Laboratory Developed Test requirements by the U.S. Centers for Medicare and Medicaid Services, unless otherwise approved in writing by the Township Manager.

Reasonable Accommodation

An employee may be exempt from the requirement to be fully vaccinated against COVID-19 if the vaccination is medically contraindicated or would require the individual to violate or forgo a sincerely held religious belief, practice, or observance. Employees who demonstrate they are exempt from the vaccination requirement of the Policy shall undergo, at a minimum, testing once per work week in accordance with Section III of the Policy.

To request an accommodation for one of the above reasons, employees shall contact the Human Resources Team. Requests for reasonable accommodations due to medical or religious/sincerely held beliefs will be accepted and evaluated consistent with the Township's Reasonable Accommodation Policies. Accommodations may vary based upon circumstances, such as job location, job duties, and shift, but will, minimally, include testing once per work week in accordance with Section III of the Policy and enhanced PPE protocols.

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

Disability/Medical Exemption: If a staff member has a disability and/or medical condition that presents a contraindication to receiving a COVID-19

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vaccine, they must provide a written certification by a licensed, treating medical provider (i.e., a physician, nurse practitioner, or physician’s assistant), of one of the following:

- The applicable CDC contraindication for the COVID-19 vaccine, or
- The applicable contraindication found in the manufacturer’s package insert for the COVID-19 vaccine, or
- A statement that the physical condition of the person or medical circumstances relating to the person are such that immunization is not considered safe, indicating the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the COVID-19 vaccine.

Religious Exemption: If a staff member declines a COVID-19 vaccine because it conflicts with a sincerely held religious belief, the staff member must complete the religious exemption request form. Staff members may be asked to supply documentation that explains the specific faith-based teachings that oppose immunizations.

General Provisions

Confidentiality

Confidentiality and respect for our staff members’ rights are important to us. The Township will not:

- Use any genetic information, disability status, or information regarding religious beliefs to disadvantage its staff members in any way;
- Use incentives in exchange for genetic information, information regarding a staff
- member’s health condition or that of their family, or information on the staff member’s religious beliefs; or
- Try to coerce staff members into supplying health/genetic/religious belief information or taking medical examinations.

Key staff within Human Resources and the Leadership Team will have access to information to check compliance. Records documenting vaccinations and declinations will be maintained by Human Resources. All information received under this policy will be kept confidential to the 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 staff members who are not in compliance with this policy or have received an exemption.

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically

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allowed by this law. To comply with this law, we are asking that you not provide any genetic information when providing information in accordance with this policy.

“Genetic information,” as defined by GINA, includes an individual’s family medical history, the results of an individual’s or family member’s genetic tests, the fact that an individual or an individual’s family member sought or received genetic services, and genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

Consequences of Non-Compliance

Failure to obtain required vaccinations or to comply with the requisite testing procedures set forth herein shall be considered a violation of the Policy. Those in violation of the Policy are subject to disciplinary action, up to and including termination, in accordance with applicable Township Policies and Procedures.

After 60 days, if a staff member has not provided documentation of vaccination or completed an exemption, they may be subject to disciplinary action, up to and including termination. Staff members not in compliance with this policy will be placed on unpaid leave until their employment status is decided by the Township Manager after consultation with the Township Supervisor.

Public health guidance, restrictions, and industry best practices regarding COVID-19 and related vaccines are changing rapidly as new information becomes available, further research is conducted, and additional vaccines are approved. The Township expressly reserves the right to modify the Policy at any time in its sole discretion, with or without notice, and directs the Township Manager to implement and update the Policy as necessary, to adapt to changing circumstances, consistent with the Township’s commitment to maintaining a safe and healthy workplace and environment.

If vaccine shortages occur and/or if CDC or government officials’ recommendations are altered, the Township may change, suspend, or revoke all or part of this policy.

Should public health guidance, restrictions, and industry best practices regarding COVID-19 be updated to require additional vaccinations, boosters, or treatments, the deadline for obtaining such vaccinations, boosters, or treatments shall be communicated to employees at least thirty (30) days prior to the compliance deadline.

Right to Change or Terminate Policy

If vaccine shortages occur and/or if CDC or government officials’ recommendations are altered, the Township may change, suspend, or revoke all or part of this policy.

Effective Date

The effective date of this Mandatory COVID-19 Vaccine Program Policy and Procedure is October 18, 2021. This policy will be reviewed after six months.