

# Mandatory Vaccine Policies: Legal Considerations for Employers

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# President Biden's Vaccine Mandate: What we (think) we know . . .

- Applies to employers who have 100 or more employees.
- Must require their workers to get the COVID-19 vaccine
- Employers can require those who refuse to get vaccinated to provide proof of a negative COVID test at least once per week before coming to work.
- Paid time off to get the vaccine, and for any side effects associated with getting the vaccine, (and potentially to take “loved ones” to get vaccinated – stated in speech, but not on WH’s COVID-19 action plan)
- Non-complying businesses could face up to \$13,600 fine for non-compliance.
- OSHA will implement an Emergency Temporary Standard (“ETS”) to implement this requirement.
- Rule will last 6 months, then has to be replaced by a permanent measure.
- Litigated expected.

# President Biden's Vaccine Mandate: What we DO NOT know (Vaccine)

- What is considered documentation for proof of vaccination and how will booster vaccinations be factored into compliance?
- Must an employee be “fully vaccinated” in order to work?
- Will the requirements only apply to vaccines that are fully approved by the Food and Drug Administration?
- Does the government have plans to centralize vaccination tracking or is it the responsibility of businesses to manage?
- What are the consequences of falsifying one's vaccination status and does responsibility rest with the individual or employer?

# President Biden's Vaccine Mandate: What we don't know (Testing)

- What is considered suitable documentation of a negative test result?
- For how long will documentation of test results need to be held?
- If an employee takes a COVID-19 test (if employer provides the option) but the results are not yet available, is the employee allowed to continue to work pending the results?
- Will business testing programs that test all employees on site (If employer provides the option) throughout the day meet the requirements for unvaccinated workers need to test “before coming to work”?
- Should employees choose not to vaccinate, is the company or employee responsible for securing **and** paying for weekly testing (if the employer provides the option)?
- How much paid time off will employees receive to get vaccine and for side effects?
  - E.g. Chicago Ordinance – up to 4 hours per injection; regular rate of pay; scheduled shift, cannot be required to use company provided time off
- Will paid time off be required for **weekly** testing requirements for non-exempt employees (if employer provides the option)? How will “weekly” be defined?

# President Biden's Vaccine Mandate: What we DO NOT know (Operational)

- When will the requirements be formally issued and what is the timeline for compliance? Effective immediately, or lead time?
  - ETS can last 180 days then needs to go through formal process.
- How does this mandate impact locations with collective bargaining and existing collective bargaining agreements?
  - Unionized employers should likely prepare to bargain over the “effects” of the decision to effectuate compliance with the new mandate (or at least the discretionary aspects with respect to vaccines vs. weekly testing) under NLRB doctrine.
- Will this federal requirement preempt existing state-imposed obligations?
  - Illinois Healthcare Right of Conscience Act
- Will the federal requirements supersede state expense reimbursement statutes?
- Do the new federal requirements include exemptions based on sincerely held religious beliefs and disabilities?
- Will waivers be allowed if essential employee absences or attrition cause significant disruption to the manufacturer.
- Downsizing?

# President Biden's Vaccine Mandate: What we DO NOT know . . .

## OTHER

- Fines – Covered employers who ignore the standard could face OSHA citations and penalties of up to \$13,600 **per violation**. Although it is currently unclear, this likely means a fine of up to \$13,600 for each facility inspected by OSHA where a covered employer has not implemented a mandatory vaccine policy or otherwise complied with the Emergency Temporary Standard.
- Remote workers?
- Who gets counted toward the 100-worker threshold?
  - Company-wide basis?
  - Part-time and Temporary workers (**counted under FFCRA**)
  - Independent contractors? (**not counted under FFCRA**)
  - If your company completed an EEO-1 report (collect demographic data about workforces and are submitted every year by companies with 100 or more employees) **ASSUME YOUR COVERED.**
  - Joint Employers

# President Biden's Federal Contractor Vaccine Mandate

- On 9/9/21, President Biden issued an “Executive Order on Ensuring Adequate COVID Safety Protocols for Federal Contractors” requires parties who contract with the federal government to provide adequate safeguards to their workers performing in “any workplace locations (as specified by the **Safer Federal Workforce Task Force Guidance**) in which an individual is working on or in connection with a Federal Government contract or contract-like instrument.”
- Contracts with the federal government shall include a clause that the **contractor and any subcontractors** shall comply with all guidance issued by the Safer Federal Workforce Task Force. This Task Force Guidance, will include the “definitions of relevant terms,” “explanations of protocols required of contractors and subcontractors,” and “any exceptions” to the vaccination mandate, must be issued by **9/24/21**.
- On 9/13/21, the Safer Federal Workforce Task Force issued its FAQs regarding vaccination requirements for federal employees/contractors on its, which was the established deadline.
- By **10/8/21**, federal government agencies shall take steps to ensure that contracts entered on or after 10/15/21 include the to-be-issued clause noted above.

# President Biden's Federal Contractor Vaccine Mandate

- The order applies to new contracts, new contract-like instruments, new solicitations for contracts or contract-like instruments, extensions or renewals of existing contracts or contract-like instruments, extensions or renewals of existing contracts or contract-like instruments; and exercises of options on existing contracts or contract-like instruments, where the relevant contract or contract-like instrument will be entered into/extended/renewed/relevant option exercised on or after **10/15/21**.
- For all **existing** contracts and contracts entered into between **9/9/21 and 10/15/21**, federal agencies are “strongly encouraged” to ensure that safety protocols required are consistent with the requirements specified in this order.
- The Executive Order explicitly **excludes** federal grants, contracts with Indian Tribes, employees who perform work outside of the United States, contracts equal or less than the simplified acquisition threshold (**generally \$250,000**), and subcontracts solely for the provision of products.



# MANDATORY VACCINATION

## (less than 100 employees)

- Under the ADA, Title VII, and other federal employment nondiscrimination laws, may an employer require all employees physically entering the workplace to be vaccinated for COVID-19? (5/28/21)
- Per EEOC Guidance: “The federal EEO laws do not prevent an employer from requiring all employees physically entering the workplace to be vaccinated for COVID-19, subject to the reasonable accommodation provisions of Title VII and the ADA and other EEO considerations discussed below. These principles apply if an employee gets the vaccine in the community or from the employer.”
- So, employers **with less than 100** employees may legally mandate employee vaccinations so long as employers provide an opportunity for employees who are unable to receive any of the available vaccines due to medical or religious prohibitions to request consideration of an accommodation.
- This is true even as Moderna and J&J vaccines await full approval by the Food and Drug Administration (“FDA”)—as confirmed by the United States Department of Justice in a July 6, 2021 Memorandum Opinion (“For the reasons set forth above, we conclude that section 564 of the FDA does not prohibit public or private entities from imposing vaccination requirements, even when the only vaccines available are those authorized under EUAs”).

# MANDATORY VACCINATION

## Who pays for time spent getting vaccinated

- **Chicago** - On April 21, 2021, Chicago became the latest locale to require employers that mandate COVID-19 vaccinations to compensate non-exempt employees for time spent getting vaccinated.
- Under the ordinance, **employers that require their Chicago employees to receive the COVID-19 vaccine** must compensate those employees at their regular rates of pay, up to four hours per dose, if the vaccination takes place during an employee's regular working hours.
- Employers also are prohibited from requiring employees to receive vaccinations outside working hours, or requiring employees to use any available paid sick leave or vacation time toward those hours.
- The ordinance also creates some new obligations for employers that merely encourage (but don't mandate) COVID-19 vaccinations.
- These employers also cannot require that employees choosing to receive a vaccination do so outside of working hours, and employees who choose to use any available paid sick leave or paid time off must be allowed to do so. Employees who obtain their vaccinations during working hours but do not have any available paid sick leave or paid time off can be required to take the time off as unpaid.

# MANDATORY VACCINATION

## Who pays for time spent getting vaccine?

- **Outside of Chicago** – While the Chicago ordinance does not require employers mandating vaccinations to pay employees for the time spent being vaccinated outside working hours, employers should be mindful of the Illinois Department of Labor's position that employees who are required to obtain a vaccination must be compensated for their time spent being vaccinated, regardless of whether that is during or outside of working hours. For those non-mandatory policies, the IDOL encourages employers to permit employees to use available paid time off to get the 1<sup>st</sup> and 2<sup>nd</sup> doses, or offer FLEX time, or just provide unpaid time off.

# MANDATORY VACCINATION POLICY CONSIDERATIONS

- When an employer intends to mandate COVID-19 vaccination, the policy should first clearly identify the scope of the policy and which employees it applies to, For example, most mandatory vaccine policies don't need to extend to remote employees if the employer has no intention of returning them to the workplace.
- Similarly, employers may want to mandate COVID-19 vaccination **only for certain job categories** but not others, depending on the level of interaction those positions have with other individuals. This is legal, if based on “job categories,” and not protected status.
- Any policy mandating vaccination should clearly identify the deadline by which employees must receive all doses. Keep in mind the impact that the vaccination deadline will have on staffing due to vaccine appointments and adverse reactions, as well as the availability of the vaccine.
- If the employer will make the vaccine available to employees, the policy should set forth details regarding the dates when vaccines will be made available and at which locations.
- If employees are expected to receive vaccines through third parties in the community, the policy should provide information about where vaccinations are being administered in the community and indicate that the employer will pay for the cost of the vaccination if there is a charge.

# MANDATORY VACCINATION POLICY CONSIDERATIONS

- For mandatory policies, communicate that the time spent becoming vaccinated is compensable (be careful with non-exempt, who choose to get vaccinated during non-working hours).
- The policy also should clearly identify how employees will be required to demonstrate proof of their immunization. The employer should ensure that all such information and documentation will be maintained confidentially—separate from personnel files.
- Employers will also need to consider employees who choose not to get vaccinated for medical or religious reasons. Any mandatory policy should also clearly set forth the process by which employees can request an exemption or other accommodation if the employee declines the vaccination on account of a qualifying medical condition or a sincerely held religious belief.
- The policy should identify who employees should notify about receiving an accommodation and how to request one.
- The policy should also assure workers that they will not be subject to retaliation for exercising this right.
- The policy also should communicate the potential consequences for anyone who fails to receive the vaccine and does not obtain an approved exemption by the stated deadline. Consequences might include increased safety measures, unpaid leave or termination.

# Who Can Know About an Employee's Vaccination Status

- Per EEOC, “Documentation or other confirmation of vaccination provided by the employee to the employer is medical information about the employee and must be kept **confidential**” and can only be disclosed on a need to know basis.
- Generally, only human resources personnel are entitled to the medical information, however, the EEOC identifies a few exceptions, one of which is that supervisors and managers may be informed about necessary restrictions on the work or duties of an employee and necessary accommodations.
  - If an employer has mandated vaccines and someone is not vaccinated and must undergo weekly COVID testing or is exempt from that requirement due to an accommodation, direct supervisor likely needs to know this so the weekly testing and accommodation can be enforced and recognized (e.g. social distancing and mask wearing).

# Who Can Know About an Employee's Vaccination Status

- Mandatory badge requirements on vaccination status **should be avoided** because it effectively amounts to the employer forcing employees to disclose their vaccination status.
  - Employees may “voluntarily” disclose their own status to others in the workplace and some may choose to do so.
  - Require employees to acknowledge in writing the voluntary nature of the disclosure of their own vaccination status.
  - Advise supervisors, still must keep it “confidential” regardless of how it is disclosed.

# Sincerely Held Religious Belief

- For a modest price (generally in the range of \$40 to \$60), enterprising organizations will provide your employee with everything needed to claim a religious exemption from your vaccine mandate, including written documentation mentioning your employee by name and describing why the organization believes the COVID-19 vaccine violates the specified faith or belief, and step by step directions on how to request an accommodation and what to do if the employer refuses to grant the accommodation.
- The term “religious” belief is broadly defined by courts and the EEOC to include theistic, non-theistic, moral, and ethical beliefs as to “what is right and wrong, which are sincerely held with the strength of religious views.”
- Religious beliefs are also described as “comprehensive” in nature as opposed to an “isolated teaching.”



# Sincerely Held Religious Belief

- Individual cases establish that the inquiry into whether the belief is “religious” focuses not on the nature of the activity or its reasonableness, but on the individual’s motivation or reason for maintaining the belief.
- For example, anti-vaccination beliefs that may be held by some Christian Scientists can be part of a “broader religious faith” and require a religious accommodation.
- **Anti-vaccination beliefs that are motivated by fear of the health effects of the vaccine, or suspicion around the underlying science or are simply motivated by personal preference are not religiously motivated.**
- Determining an individual’s motivation is difficult, and employers should be cautious in challenging the religious nature of the belief.

# Sincerely Held Religious Belief

- The sincerity of a religious belief is generally presumed. Inquiries into the sincerity of the belief do not focus on the “motives or reasons for holding the belief.”
- Rather, it is a matter of the individual’s credibility. The sincerity of religious beliefs can be supported by an employee’s oral or written statements that describe beliefs and practices and how an employee adheres to such belief.
- At the time the employee makes a request for a religious accommodation, the employer has an opportunity to engage in an interactive discussion with the employee to understand and to verify the reason that underlies the employee’s request for a religious accommodation and to determine whether a duty to accommodate arises.
- Based on the interactive process, the employer may request limited additional information about the facts and circumstances that support the request for accommodation if the employer has an objective basis for doubting either the religious nature or the sincerity of a particular belief, observance or practice.

# Sincerely Held Religious Belief

- It is important to note, however, that the employee's own written explanation may be considered sufficient, and if third-party verification is requested, a third party other than a religious official may provide the verification.
- The EEOC recommends that unless the employer has an objective basis for questioning the religious nature or sincerity of a belief, observance or practice, the employer should presume the request for religious accommodation is sincere.
- Employers are less likely to successfully challenge the existence of a sincerely held religious belief in the absence of an admission by the employee that their belief is based on a reason other than a sincerely held religious belief or actual evidence of fraud or deceit by an employee claiming a religious exemption.

# Sincerely Held Religious Belief

- The undue hardship assessment provides employers with the better opportunity to evaluate a religious accommodation request.
- Under both the ADA and Title VII, the employer has a defense to providing accommodations if the employer can demonstrate “undue hardship.”
- Under the ADA, in order for an employer to prove undue hardship, the employer must prove the requested accommodation would be “an action requiring significant difficulty or expense.”
- In contrast, Title VII’s undue hardship defense to providing religious accommodations has been defined by the Supreme Court as requiring a showing that the proposed accommodation in a particular case poses “more than a de minimis” cost or burden on the operation of an employer’s business.
- Although the burden is on the employer to prove undue hardship, this is a much easier standard for employers to prove.
- Factors to consider include the type of workplace, the nature of the employee’s duties, identifiable costs of the accommodation in relation to the size and operating costs of the employer, and the number of employees who will need a particular accommodation.

# Medical Vaccine Exemption

- An employer must provide an accommodation to an unvaccinated employee with a properly documented medical condition for which the COVID-19 vaccine is contraindicated, so long as doing so would not pose a direct threat due to a significant risk of substantial harm to the health or safety of the individual or others (e.g., an unvaccinated individual exposing others in the workplace)—an “undue hardship” under the ADA.
- HR personnel should assess the following four factors to determine whether an unvaccinated employee would present such a direct threat: (1) the duration of the risk; (2) the nature and severity of the potential harm; (3) the likelihood that the potential harm will occur; and (4) the imminence of the potential harm.

# Medical/Religious Vaccine Exemption

- Importantly, companies cannot automatically terminate an unvaccinated employee because the employee's medical or religious vaccination exemption request would present a direct threat or burden to costs and operations.
- Instead, employers must first engage in the interactive process to determine if there is a reasonable accommodation, without incurring undue hardship, such that would **significantly reduce and/or eliminate** the risk of having an unvaccinated worker in the workplace, which may include continued mask wearing, daily negative COVID tests, changed shifts or work locations.
- Because these determinations are fact-specific and must be implemented in a careful manner, HR should consult employment counsel before determining which reasonable accommodations might be appropriate for a specific unvaccinated employee.

# Teleworking as an Accommodation

- Any time an employee requests a reasonable accommodation, the employer is entitled to understand the disability-related limitation that necessitates an accommodation
- If there is **no** disability-related limitation that requires teleworking, then the employer **does not have to provide telework as an accommodation.**
- *Or*, if there is a disability-related limitation, **but the employer can effectively address the need with another form of reasonable accommodation at the workplace** (mask wearing, weekly negative COVID tests, changed shifts or work locations), then the employer can choose that alternative to telework.
- *Per EEOC*, To the extent that an employer is/has permitting/ed telework to employees because of COVID-19 and is choosing to excuse an employee from performing one or more essential functions, then a request to continue telework as a reasonable accommodation **does not have to be granted** if it requires **continuing to excuse the employee from performing an essential function.**
- The ADA never requires an employer to eliminate an essential function as an accommodation for an individual with a disability.

# Exposing other Family Members

- Although the ADA prohibits discrimination based on association with an individual with a disability, that protection is limited to disparate treatment or harassment.
- The ADA does not require that an employer accommodate an employee **without a disability** based on the disability-related needs of a family member or other person with whom she is associated.
- For example, an employee without a disability is not entitled under the ADA to telework as an accommodation in order to protect a family member with a disability from potential COVID-19 exposure.



# GOVERNOR PRITZKER MASK MANDATE

- On September 3, 2021, Governor Pritzker signed Executive Order 21-22 which requires all individuals over the age of 2 and who can medically tolerate a face covering to wear a face covering when in indoor public places.
- “Public indoor places” is defined in the EO to include **businesses**, retail establishments, office buildings, entertainment venues, hotel meeting rooms and ballrooms, lobby areas, indoor sports complexes, and other places of leisure.
- Does the face covering requirement apply to employees who wear other safety equipment on their heads or faces?
  - Per 9/3/21 IDCED FAQ, “There are circumstances when wearing a face covering may not be possible. According to CDC guidance for wearing masks, face coverings should not be worn by a person for whom wearing a face covering would create a risk to workplace health, safety, or job duty as determined by the workplace risk assessment.”

# GOVERNOR PRITZKER MASK MANDATE

- Do I have to wear a face covering indoors if I'm able to maintain six feet of physical distancing **some or most of the time**?
  - Per 9/3/21 IDCED FAQ, “Yes. Individuals in indoor public places must wear a face covering at all times, unless they can **consistently** (*i.e.* all the time) maintain six feet of distance (such as when working in an office or cubicle).”
  - “All employees in indoor workplaces must wear a face covering.”
- Should an employee wear a face covering while working in an office or cubicle?
  - Per 9/3/21 IDCED FAQ: “Face coverings may be removed by workers at workplaces when they can consistently maintain six feet of distance, such as when workers are in their office or cubicle space.”
- Do manufacturing employees need to wear face coverings?
  - Per 9/3/21 IDCED FAQ: “Face coverings may be removed by workers at workplaces when they can consistently maintain six feet of distance.”

# GOVERNOR PRITZKER MASK MANDATE

- What does it mean for a person to have a medical condition that prevents the person from wearing a face covering?
  - Per 9/3/21 IDCED FAQ: “A person who cannot wear a mask or cannot safely wear a mask because of a disability as defined by the Americans with Disabilities Act (ADA) (42 U.S.C. 12101 et seq. [i.e. “a physical or mental impairment that substantially limits one or more major life activities”]) is not required to wear a face covering pursuant to the Executive Order. Employers should discuss the possibility of reasonable accommodation with workers who are not fully vaccinated, who are unable to wear a mask, or who have difficulty wearing certain types of masks because of a disability.”
  - “A person for whom wearing a mask would create a risk to workplace health, safety, or job duty as determined by the relevant workplace safety guidelines or federal regulations is not required to wear a face covering while working.”
  - “Persons who cannot medically tolerate a face covering are exempt from the Order.”

# Amendment to the IHRA

- On August 2, 2021, Governor J.B. Pritzker signed into law Public Act 102-0233, which adds “work authorization status” to the list of protected classifications in Illinois under the Illinois Human Rights Act (IHRA).
- Effective immediately, the IHRA now makes it a civil rights violation for an employer to discriminate in any employment action (i.e. hiring, discipline, promotion, termination, etc.) based on an employee’s work authorization status.
- “Work Authorization Status” means the status of being a person born outside of the United States, and not a U.S. citizen, who is authorized by the federal government to work in the United States.
- Specifically, it is a civil rights violation for an employer to "refuse to honor work authorization based on the specific status or term of status that accompanies the authorization to work[.]"
- Proponents of the Bill have explained that it is a response to recent employment discrimination lawsuits alleging employers refused to hire Deferred Action of Childhood Arrivals (DACA) recipients and it therefore seeks to prohibit discrimination based on federal work authorization status, without regard to how or why they obtained their work authorization

# Amendment to the IHRA

- Avoid gathering information about individuals' specific work authorization status beyond what is needed to establish whether the individual has federal employment authorization.
- Review application forms, interview templates, hiring metrics, and evaluation guidelines used for Illinois operations to determine whether they call for a response that would identify individuals' employment status or rely on that status for evaluation purposes. If they do, consider whether the question is specifically targeted to a clearly defined essential business purpose - or if it can be eliminated altogether.
- Update Illinois employee handbooks, non-discrimination policies, and non-discrimination training materials to clearly communicate a policy of non-discrimination against individuals' work authorization status.
- Avoid making any adverse employment decision based solely on an individual's specific work authorization status. For example, do not refuse to hire a qualified individual who is federally authorized for employment solely because their authorization may expire at some later date. Rather, employers should ensure that employment decisions for positions with designated or extended time-frames are directly aligned with clear business objective

# Amendment to the IHRA

- The Illinois Legislature has passed an amendment to the Illinois Human Rights Act (HB 1838), adds to the definition of disability discrimination, now including **“unlawful discrimination against an individual because of the individual’s association with a person with a disability.”**
- This definition brings Illinois’ law in line with the federal Americans with Disabilities Act (ADA).
- The difference, however, is that the ADA applies to employers with 15 or more employees and the IHRA defines employers as having one or more employees.
- Governor Pritzker signed the bill into law on August 20, 2021 (Public Act 102-0419), the law will go into effect January 1, 2022.

# Higher Penalties for Wage Violations

- On 7/9/21, Governor Pritzker signed [an amendment](#) to the [Illinois Wage Payment and Collection Act](#) that **increases the penalty for underpaying wages from 2% of the amount of the underpayment per month to 5%**. That may not sound like a lot, but it adds up fast.
- Suppose a former employee claims that their employer failed to pay them \$5,000 in vacation pay upon separation from employment.
- Employees have up to 10 years to file a lawsuit under the Act, so it may be several years before the claim is even filed, let alone before it works its way through the legal system.
- Assume optimistically that the claim is filed immediately and is resolved in the employee's favor two years after the employee's termination.
- Previously, the employee would be entitled to recover the original \$5,000 plus an additional \$2,400 (2% of \$5,000 per month x 24 months) in statutory penalties.
- Under the amended law, the penalties **would be \$6,000** (5% of 5K per month x 24 months), more than double the original amount due.
- The employer would also be on the hook for the employee's attorneys' fees, in addition to its own defense costs and other penalties.
- This change brings the penalty provisions of the IWPCA in line with earlier amendments to the Illinois Minimum Wage Law. However, the IMWL provides for employees to recover triple the amount of any wages due, in addition to the 5% penalty.

# Required Illinois Training



## VIRTUAL TRAINING SERIES:

# Sexual Harassment Prevention

All Illinois employers are required to conduct annual sexual harassment prevention training. At a minimum, this must include:

- an explanation and examples of what constitutes unlawful sexual harassment
- a summary of relevant federal and state provisions and remedies available to victims
- a summary of employers' responsibilities in preventing, investigating and taking corrective measures in regard to sexual harassment

Greensfelder is providing multiple virtual options to meet the needs of all Illinois employers. Each session not only meets but exceeds Illinois' annual training requirements.

### WHY CHOOSE OUR TRAINING?

- ☑ Our comprehensive training courses offer separate and distinct sessions for employees and supervisors, with each covering the prevention of discrimination, harassment, retaliation and bullying in the workplace under Illinois and federal laws. The full program covers all aspects of a true comprehensive training on these important topics for employers of all types, in all industries.
- ☑ Following the U.S. Supreme Court's recent ruling that all employers are prohibited from discriminating against employees based on the employee's sexual orientation and/or gender identity, our training covers this important change as well.
- ☑ Failure to provide training each year is a violation of the Illinois Human Rights Act. Illinois employers who do not provide compliant training will be subject to civil penalties, including a \$500 penalty to any business with fewer than 4 employees, or \$1,000 to those with 4 or more employees. Penalties for subsequent violations can rise to \$5,000 each.



Trainings will be led by Greensfelder Officer [Scott Cruz](#), an experienced labor and employment attorney. For more information or to order training sessions, contact Scott at 312-345-5008 or [scruz@greensfelder.com](mailto:scruz@greensfelder.com).

### TRAINING OPTIONS

#### PRE-RECORDED TRAININGS

Employee or supervisor recording  
(one program)

**\$499**

Employee and supervisor recordings  
(two programs)

**\$899**

#### BEST VALUE

Programs are about 2 hours each. Recordings are password-protected and available via any internet streaming platform through Dec. 31, 2021, when links will be removed from the cloud.

#### LIVE VIRTUAL TRAININGS

Live virtual training via Zoom customized for your workplace, including a live Q&A opportunity

**\$2,400**

Live programs will run about 2 hours. Recordings can be provided afterward as well, available via any internet streaming platform until Dec. 31, 2021, when the link will be removed from the cloud.

Because employers must maintain documentation for each employee establishing compliance with the training requirement, a certificate of attendance/completion will be made available for each employee, and a copy of the PowerPoint also will be made available to download.



# Questions?



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# More Resources

For updates, visit:

- **Greensfelder COVID-19 Resources page:**

<https://www.greensfelder.com/covid-19-resources.html>

- **SimplyHR Blog:**

<https://www.greensfelder.com/employment-and-labor-blog>

# THANK YOU!

Legal Disclaimer: This document is not intended to give legal advice. It is comprised of general information. Employers facing specific issues should seek the assistance of an attorney.

 GREENSFELDER

125 YEARS