



**CITY OF CHICAGO  
DEPARTMENT OF HUMAN RESOURCES**

**CITY OF CHICAGO RELIGIOUS ACCOMMODATION POLICY**

Effective Date: May 2, 2023

**I. Statement of Purpose**

The City of Chicago (“the City”) is an Equal Employment Opportunity employer that provides reasonable accommodations to allow employees to exercise their sincerely held religious beliefs or practices.

The Religious Accommodation Policy and related procedures are implemented and managed by the Diversity and Equal Employment Opportunity Division of the Department of Human Resources (“DHR”).

**II. Applicability**

This Policy applies to volunteers and employees of the City of Chicago, permanent or temporary, paid, or unpaid, as well as to all applicants for positions with the City, except that employees of the Chicago Police Department ("CPD") must make requests for religious accommodations in accordance with the General Orders and directives in effect at CPD.

Any reference to “employee” or “employees” in the Policy shall also include volunteers.

**III. Limitations**

Nothing in this Policy is intended to nor shall be construed to create a private right of action against the City of Chicago or any of its employees. Furthermore, no part of this Policy shall be construed to create contractual or other rights or expectations.

Nothing herein is intended to affect the right of any person to:

- make a charge of discrimination at the Chicago Commission on Human Relations or any local, state, or federal agency with jurisdiction over such claims.
- raise a grievance under a collective bargaining agreement, or
- consult a private attorney

#### **IV. Rights of Employees and Applicants**

Any employee or applicant whose sincerely held religious beliefs or related practices pose a conflict with his or her job duties, work schedule, or any City of Chicago policy, has a right to seek a reasonable accommodation for religious practice.

Employees or applicants who believe their rights as set forth in this Policy have been denied may contact the Diversity and Equal Employment Opportunity Division (“EEO Division”) of DHR.

#### **V. Responsibilities of Applicants and City Personnel**

**Employees** are expected to communicate their need for accommodation for religious practice to a supervisor or their EEO Liaison, and to participate in an interactive process. The interactive process is a dialogue and exchange of information between the employees seeking an accommodation, supervisors and the EEO Liaison or HR Deputy in the employee’s department.

**Supervisors** shall inform their departmental EEO Liaison if they become aware of an employee’s need for an accommodation and direct the employee to the EEO Liaison. Supervisors shall assist the EEO Liaison during the interactive process by providing information about the employee’s duties and/or work schedule, or any other information the EEO Liaison may need to assess the accommodation request.

**Departmental Human Resources Deputies (HR Deputies)** shall participate in and facilitate the accommodation process as described in Section VI of this Policy. (The HR Deputy is the Deputy Commissioner level employee in each department who has primary responsibility for personnel matters. If a department does not have such a Deputy level person within its leadership, then these responsibilities should be handled by the Department Head.)

**Departmental EEO Liaisons** shall participate in and facilitate the accommodation process as described in Section VI of this Policy. <sup>1</sup>

**Department Heads** shall take the steps necessary to implement this Policy.

**Human Resources Liaisons (HR Liaisons)** shall assist any applicant who expresses a need for an accommodation to participate in the hiring process. (An HR Liaison is an

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<sup>1</sup> EEO Liaisons are designated pursuant to the City’s Diversity and Equal Employment Opportunity Policy. Employees can obtain the name of their department’s EEO Liaison by contacting the EEO Division at DHR.

individual assigned to handle various functions related to hiring employees in their department.)

**Applicants** should inform the hiring department of any need for an accommodation for religious practice to participate in the hiring process. Applicants can inform the hiring department's HR Liaison or the person who is their contact for scheduling the interview.

**DHR's EEO Officer** shall assist departments in implementing this Policy by answering questions and providing guidance as needed.

**DHR's EEO Deputy Commissioner** shall assist departments by providing guidance as needed and manage the overall implementation of the Policy.

## **VI. The Accommodation Process for Employees and Volunteers**

### **a. Requesting an Accommodation for Religious Practice**

Employees who need an accommodation for religious practice must make a request in writing. The written request must include:

- Identification of the religious practice or sincerely held belief for which the employee is seeking accommodation,
- A description of how the religious practice or sincerely held belief conflicts with the employee's duties, work schedule or City Policy, and
- A detailed description of the accommodation that the employee is seeking, including the dates or duration that the accommodation is needed, and expected frequency (such as daily, weekly or specific dates.)

Employees are encouraged, but not required, to use the *Employee Request for Accommodation for Religious Practice* form. The employee shall submit the request to the EEO Liaison for his or her department.

### **b. Assessment of the Request**

The EEO Liaison is responsible for reviewing and assessing the accommodation request and will make a recommendation to the department's HR Deputy, who must make the determination whether to grant or deny the accommodation.

Upon receipt of an accommodation request, the EEO Liaison must promptly initiate an interactive process with the employee to determine what accommodation could address the conflict between the employee's sincerely held religious belief and the employee's work duties, schedule, or City policy. The EEO Liaison should inform the HR Deputy each time an accommodation request is received. The EEO Liaison must review each request on a case-by-case basis.

The EEO Liaison must complete the assessment as expeditiously as possible. The EEO Liaison may consult with the employee's supervisor or other appropriate

departmental managers regarding the request, as needed, but should not inform anyone who is not directly involved in determining whether an accommodation should be granted or what an appropriate accommodation should be.

The EEO Liaison should not require that an employee provide proof of their religious affiliation.

In assessing the request, the EEO Liaison must consider factors such as:

- Whether the requested accommodation or other accommodation would eliminate or reduce the conflict between the employee's sincerely held religious belief and job duties, schedule, or City Policy.
- How the requested accommodation would impact departmental operations.
- Whether the requested accommodation or other accommodation would create an undue hardship for the City. Examples of reasons that the accommodation would create an undue hardship, include, but are not limited to:
  - The proposed accommodation would violate a Collective Bargaining Agreement (CBA).
  - The proposed accommodation would create a safety or security risk.
  - Granting the proposed accommodation would infringe upon the rights or interests of the accommodated employee's coworkers.

The EEO Liaison must document the interactive process by keeping notes of all meetings or discussions with the employee, maintaining copies of relevant documents and noting all accommodation options discussed or offered.

**c. The Determination – Granting the Accommodation Request**

Once the EEO Liaison has identified a potential accommodation that will address the employee's sincerely held religious belief or practice, the EEO Liaison shall make a recommendation to the department's HR Deputy.

The HR Deputy shall either approve the recommended accommodation or work with the EEO Liaison and the requesting employee to continue the interactive process until another accommodation option has been identified.

The HR Deputy will give final approval once an accommodation has been identified and should inform the employee using a determination notice template to be provided by DHR.

**d. Granting Requests - Duration**

The approved accommodation will be valid for one year from the date of the determination notice. Employees who wish to extend the accommodation beyond one year must make an updated request, and the EEO Liaison will conduct a new assessment and interactive process.

**e. Granting Requests - Absences**

Employees may elect to use accrued paid time off (excluding sick time), as part of their approved accommodation for religious practice. Employees who do not have sufficient accrued time available may be allowed to take unpaid time off as part of their approved accommodation for religious practice. The EEO Liaison and HR Deputy will consider all reasonable options to allow for absences related to an employee's religious accommodation request.

**f. The Determination - Denying the Accommodation Request**

If the EEO Liaison or, the EEO Liaison and the HR Deputy have conducted an interactive process with the employee and conclude that the department cannot provide any accommodation that will enable the employee to engage in religious practice without causing an undue hardship to the City, the HR Deputy shall contact either DHR's EEO Deputy or the Deputy Corporation Counsel for the Labor Division in the Department of Law ("Labor Division") to discuss further options before denying the employee's request.

Accommodation requests will be denied under circumstances including, but not limited to the following:

- The requested accommodation would pose an undue hardship on operations of the City.
- The requesting employee failed to participate in the interactive process.
- There is no known accommodation which would eliminate or lessen the conflict between the employee's sincerely held religious beliefs and a City policy, practice, or schedule.

**VII. The Accommodation Process for Applicants**

Applicants for employment should inform the hiring department's HR Liaison of any need for a religious accommodation to participate in the hiring process. The HRL should consult with the department's EEO Liaison or DHR's EEO Officer or EEO Deputy to determine what accommodation should be provided to the applicant. In no event should the HRL inform the interview panel, or anyone connected with hiring sequence of the applicant's request, or any accommodation granted. If the HRL needs to advise the interviewers of a schedule change, the HRL must do so without disclosing the religious accommodation or request for accommodation.

**VIII. Confidentiality**

All individuals responsible for reviewing and assessing requests for accommodation should maintain the confidentiality of all information obtained pursuant to the request.

**IX. Contact Information**

City of Chicago Department of Human Resources  
Diversity and Equal Employment Opportunity Division  
121 N. LaSalle St., Room 1100  
Chicago, IL 60602  
Tel: (312) 744-4224  
Email: [eeodiversity@cityofchicago.org](mailto:eeodiversity@cityofchicago.org)



**CITY OF CHICAGO DEPARTMENT OF HUMAN RESOURCES  
REQUEST FOR RELIGIOUS ACCOMMODATION**

This form is to be completed by any City of Chicago employee or applicant for employment who is requesting a religious accommodation pursuant to the City’s Religious Accommodation Policy. When complete, this form must be submitted to the employee’s departmental EEO Liaison or to the departmental Human Resources Liaison if the requester is an applicant.

Questions about this form or the Religious Accommodation Policy can be directed to the Department of Human Resources, Diversity & Equal Employment Opportunity Division at [eeodiversity@cityofchicago.org](mailto:eeodiversity@cityofchicago.org)

Tel.: (312)744-4224

TTY: (312)744-5035

**EMPLOYEE/APPLICANT INFORMATION**

Name:

Best Contact Number:

Work Phone:

Job Title:

Department:

Work Location:

**IF NECESSARY, PLEASE USE ADDITIONAL SHEETS FOR ANY OF THE INFORMATION REQUESTED.**

**QUESTIONS TO DOCUMENT THE REASON FOR THE REQUEST**

Please identify the religious practice or sincerely held belief for which you are seeking accommodation:

Please describe the way in which your religious practice or sincerely held belief conflicts with a City policy, practice, or schedule:

**QUESTIONS TO CLARIFY THE ACCOMMODATION REQUEST**

What specific accommodation are you requesting? (For example, time or space for prayer during workday, leave for a religious holiday or to attend a religious observance, modification to dress code or uniform, etc.) Please describe in detail.

Please state the date[s] or frequency of the requested accommodation (For example, daily, weekly, or a specific date or dates):

**By signing below, I attest that the information provided in this document is true and accurate to the best of my knowledge.**

Employee/Applicant Signature:

Date: