
SUBJECT:

COVID-19 SUPPLEMENTAL PAID SICK AND FAMILY LEAVE POLICY

During this public health crisis, employee health and safety is of paramount importance. Therefore, Federal, State, and City governments are working together to slow person to person transmission and stop the spread of the virus known as COVID-19. This COVID-19 Supplemental Sick Leave Policy temporarily supplements the City of Binghamton’s (“City”) existing leave of absence, sick leave, and PTO policies and contractual benefits and accounts for the new federal emergency leave benefit law and state quarantine leave law. This Policy addresses City obligations and employee benefits for COVID-19 related quarantine or isolation leave.

If the employee is not eligible for paid leave time under the new laws, or has exhausted paid leave time, the City will work with the employee to accommodate unpaid leave under the FMLA/ADA. No adverse action will be taken against any employee for taking sick or family leave under this Policy.

For non-essential employees already taking paid leave under Governor Cuomo’s 202.4 Executive Order, effective March 17, 2020, as codified by City Policy, this Supplemental Policy does not alter such employees’ existing paid leave effective through April 15, 2020.

This Supplemental Policy uses the following acronyms:

- PTO:** Paid time off as provided by collective bargaining agreements or by the City for non-union employees, e.g., vacation, personal leave (PL) days, and sick time.
- FFCRA:** Families First Coronavirus Response Act
- EPSL:** Emergency Paid Sick Leave
- EPSLA:** Emergency Paid Sick Leave Act
- NYSQL:** New York State Quarantine Leave Law
- FMLA:** Family Medical Leave Act
- EFMLA:** Emergency Family Medical Leave Act pursuant to FFCRA
- ADA:** Americans with Disabilities Act
- NYSDOH:** New York State Department of Health
- CDC:** Centers for Disease Control and Prevention

I. SUMMARY

The federal emergency leave benefit law (“FFCRA”) and New York State Quarantine Leave law (“NYSQL”) generally provide two weeks of emergency paid sick or family leave to an employee separate and apart from any employee accruals. The federal and state paid leave laws are in addition to an employee’s existing leave benefits provided by contract (vacation, personal, sick time) and City policies.

In short, and explained in more detail below, an employee may be entitled to paid leave if (1) under a mandatory or precautionary order of quarantine related to COVID-19; (2) a health care provider has advised the employee to self-quarantine due to COVID-19; (3) is symptomatic for COVID-19 and seeks a medical diagnosis; (4) needs to care for an individual, including a child, that is quarantined due to COVID-19; (5) needs to care for their son or daughter due to a mandatory school closure as a result of COVID-19; or (6) has a substantially similar condition to COVID-19 specified by the Secretary of Health and Human Services.

Whether NYSQL or FFCRA applies depends on which provides greater benefit; they run concurrently. For example, NYSQL categories provide full pay, whereas some FFCRA categories provide 2/3rds pay (e.g., Categories 4-5). In such instances, full pay under NYSQL would apply. If there is no work available for the employee, then the employee is not eligible for paid leave under NYSQL or FFCRA.

If an employee is eligible for the Emergency Family Medical Leave Act (EFMLA) protections due to a child’s school closure, the City’s FMLA policy applies in that their accrued time must run concurrently after the first two weeks of emergency paid sick leave (EPSL). (Section III(B)).

While Emergency Responders may be excluded from these additional leave benefits, the City adopted this policy to allow application of such paid leave benefits in certain circumstances specific to Emergency Responders below (Section III(C)). Emergency Responders are City employees in the following departments, with some exception for administrative staff: Police Bureau, Fire Bureau, Public Works, Water & Sewer, Parks & Recreation, Maintenance, Code Enforcement, and Building & Construction.

In the event that an employee is not eligible under the new paid leave benefit laws, but has a public health concern, the City will work with a concerned employee to accommodate application of the employee’s accrued time or unpaid time under the Family Medical Leave Act or Americans With Disabilities Act as applicable.

If an employee believes that they qualify for additional paid leave benefits discussed in more detail below, please contact the Office of Personnel & Safety immediately. The Office will assist the employee in navigating their benefits, including the appropriate request forms and required documentation.

If the City has knowledge that an employee is taking paid leave separate from their accruals and is eligible for the paid leave provided in the NYSQL/FFCRA, the City may apply such paid leave time going forward upon notice to the employee, even while awaiting supporting documentation.

II. NEW YORK STATE QUARANTINE LEAVE ELIGIBILITY & PROCESS

As of March 18, 2020, pursuant to the New York State Quarantine Leave Law (“NYSQL”), a qualifying City employee must be provided up to 14 calendar days of paid sick or family leave related to COVID-19 quarantine or isolation at the employee’s regular rate of pay, separate from any employee accruals. The pay should represent the amount of money that the employee would have otherwise received for the 14 day period.

Eligibility

An eligible employee must meet one of the below criteria:

- (1) The employee is under mandatory or precautionary order of quarantine or isolation issued by the State of New York, NYS Department of Health, Local Board of Health, or any governmental entity duly authorized to issue a mandatory or precautionary order due to COVID-19.
- (2) The employee’s child is under mandatory or precautionary order of quarantine or isolation issued by the State of New York, NYS Department of Health, Local Board of Health, or any governmental entity duly authorized to issue a mandatory or precautionary order due to COVID-19.
- (3) The employee’s child’s school is closed due to a mandatory or precautionary order of quarantine or isolation issued by the State of New York, NYS Department of Health, Local Board of Health, or any governmental entity duly authorized to issue a mandatory or precautionary order due to COVID-19.

Despite meeting the above requirements, an employee is not eligible if:

- (1) If the employee is not showing symptoms and is physically able to work through remote access or similar means.
- (2) If the employee is subject to a quarantine due to voluntary travel to a country with level two or three health notice from the CDC and had notice of the travel health notice.
- (3) If the employee has exhausted available quarantine paid sick leave benefits available under the new federal and state quarantine benefits laws.

A mandatory or precautionary order under the NYSQL either relates to an individual’s condition (exposed, diagnosed, symptoms) or a school closure. **General Government “Stay at Home” Orders DO NOT qualify employees for NYSQL.**

Documentation Requirements

For reasons (1) & (2), the employee must provide a written “order of quarantine or isolation” from a competent public health authority, such as a local health department.

If the order of quarantine/isolation is not immediately available from a local health department, the employee may submit a medical provider’s “attestation” containing the following:

- (1) The attestation for an isolation must state that: the employee tested positive for COVID-19; or testing is not currently available for the employee, but the employee has COVID-19 symptoms and has had contact with a known COVID-19 case;
- (2) The attestation for a mandatory quarantine must state that: the employee has been in close contact with someone who has tested positive for COVID-19 or who is currently in mandatory isolation; or the employee has COVID-19 symptoms and has returned within the past 14 days from a country designated with a level 2, 3, or 4 advisory for COVID-19;
- (3) The attestation for a precautionary quarantine must state that: the employee is asymptomatic and has returned within the past 14 days from a country designated with a level 2, 3, or 4 advisory for COVID-19; or the employee has been determined to have had proximate exposure with someone who has tested positive for COVID-19 while that person was symptomatic.

For reason (3) (School Closure), the employee must provide dates for which the leave is requested, the name of the child, name of the school, school closure order or similar documentation, and a statement that no other person can care for the child.

Process

In order to obtain paid sick or family leave under this Policy, the employee should follow the following process:

- Provide notice to the City's Office of Personnel & Safety that the employee believes they are eligible and the basis for eligibility.
- Complete the request form for NYS quarantine paid sick leave with supporting documentation, including the quarantine/isolation order if available.
- Any submissions can be done electronically/remotely. **Employees should not come to City Hall if the employee or someone the employee is caring for is under a mandatory or precautionary order of quarantine or isolation.**
- Once the employee request documentation is submitted, the City will review and make a determination granting the request, denying the request due to lack of eligibility, or determining a need for more information/documentation, as soon as possible.
- The City shall make a determination in writing.
- If eligible, City will provide the employee up to 14 paid sick leave days.
- If the employee exhausts quarantine paid sick leave under the new federal or state quarantine employee benefits laws, or is ineligible, the employee may qualify for leave under EFMLA (see below) or additional City policies, including FMLA and ADA policies.
- Forms are available upon request from the Office of Personnel & Safety. Email Personnel at lpstestani@cityofbinghamton.com or pakeppler@cityofbinghamton.com or call 607.772.7008.

Benefits under FFCRA and NYSQL must run concurrently. In this circumstance, any benefit under the NYS law will be the incremental difference between full NYS Quarantine Paid Sick Leave benefits and the benefits provided under the FFCRA.

III. FEDERAL FAMILIES FIRST CORONAVIRUS RESPONSE ACT (FFCRA)

What is the Families First Corona Virus Response Act?

The Families First Coronavirus Response Act (FFCRA), among other federal fiscal packages, does three things: (1) creates 2 weeks of paid sick leave for childcare and other leave related to the coronavirus (EPSL); (2) expands the Family and Medical Leave Act (FMLA) temporarily (until the end of December 2020) to cover leave needed for the care of children out of school because of COVID-19; and (3) provides for tax credits related to the paid leave mandated by the act. These benefits have certain restrictions and requirements. See below.

The City shall retain all documentation of FFCRA emergency paid leave requests for four years.

Employees Must Be Unable to Telework Due to COVID-19 Related Reasons

All benefits under this Act are dependent upon an employee's inability to work or telework because of an enumerated COVID-19 related reason. Where possible, the City will enable flexible telework arrangements that allow employees to perform work, potentially at unconventional times, while tending to family and other responsibilities, such as teaching children whose schools are closed for COVID-19 related reasons.

An employee subject to a quarantine or isolation order or caring for someone under such order will be deemed able to telework, and therefore may not take paid sick leave, if:

- a) The City has work for the employee to perform; and
- b) The City permits the employee to perform that work from the location where the employee is being quarantined or isolated/ or where the employee is caring for someone subject to a quarantine or isolation order; and
- c) There are no extenuating circumstances that prevent the employee from performing that work.

Below is an explanation of employee benefits under the FFCRA for Emergency Paid Sick Leave and Emergency Family and Medical Leave Expansion Act (EFMLA).

A. FEDERAL EMERGENCY PAID SICK LEAVE ELIGIBILITY & PROCESS

City employees, regardless of time employed with the City, may be eligible for Emergency Paid Sick Leave (EPSL) under the FFCRA.

However, under the FFCRA, City employees that are Emergency Responders may be excluded from EPSL coverage, unless exceptional circumstances exist. Emergency Responders are employees in the following departments, with some exceptions for administrative staff: Police Bureau, Fire Bureau, Public Works, Water & Sewer, Parks & Recreation, Maintenance, Code Enforcement, and Building & Construction. Please see Paid Leave for Emergency Responders, addressed in Section III(C) below.

Eligibility

EPSL is available if an employee is unable to work or telework due to any of the six qualifying reasons:

1. The employee is subject to a Federal, State, or local quarantine or isolation order related to COVID-19;
 - Quarantine or isolation orders include a broad range of governmental orders, including orders that advise some or all citizens to shelter in place, stay at home, quarantine, or otherwise restrict their own mobility.
 - An eligible employee would be able to work or telework “but for” being required to comply with a quarantine or isolation order.
2. The employee has been advised by a health care provider to self-quarantine due to concerns related to COVID-19;
 - Advice to self-quarantine must be based on the health care provider’s belief that the employee has COVID-19, may have COVID-19, or is particularly vulnerable to COVID-19.
 - Self-quarantining must prevent the employee from working or teleworking.
3. The employee is experiencing symptoms of COVID-19 and seeking a medical diagnosis;
 - Symptoms include fever, dry cough, shortness of breath, or other COVID-19 symptoms identified by the CDC.
 - Leave taken for this reason must be limited to the time the employee is unable to work because he or she is taking affirmative steps to obtain a medical diagnosis.
 - The employee may not take paid sick leave to self-quarantine without seeking a medical diagnosis.
 - If an employee who is waiting for the results of a test is able to telework, they may not take paid sick leave.
 - If an employee exhibits COVID-19 symptoms and seeks medical advice, but is told that they do not meet the criteria for testing and is advised to self-quarantine, they are eligible for leave under the second reason, discussed above.
4. The employee is caring for an individual who is subject to an order as described in subparagraph (1) or has been advised as described in paragraph (2);
 - Individual being cared for must: (a) be subject to a Federal, State, or local quarantine or isolation order as described above; or (b) advised by a health care provider to self-quarantine as described above.
 - Applies only if but for the need to care for an individual, the employee would be able to perform work.
 - The employee must have a genuine need to care for the individual.
 - The individual being cared for must be an immediate family member, roommate, or a similar person with whom the employee has a relationship that creates an expectation that the employee would care for the person if he or she self-quarantined or was quarantined.

5. The employee is caring for a child if the school or place of care of the child has been closed, or the child care provider of such child is unavailable, due to COVID-19 precautions; or
 - Employee may take paid sick leave to care for his or her child only when the employee needs to, and actually is, caring for his or her child.
 - Covers need to care for a child under age 18 years of age, or when a child is 18 years of age or older and incapable of self-care because of a mental or physical disability.
 - Employee does not need to take such leave if another suitable individual— such as a co-parent, co-guardian, or the usual child care provider—is available to provide the care the employee’s child needs.
 - Leave authorized by the EFMLA is the same as the fifth reason discussed above authorized by the EPSLA.

6. The employee is experiencing any other substantially similar condition specified by the Secretary of Health and Human Services in consultation with the Secretary of the Treasury and the Secretary of Labor.

For categories (1), (2), and (4), any qualifying quarantine or isolation order shall be interpreted broadly to include a range of government orders such as shelter in place, stay at home, quarantine or other such order that restricts citizens’ mobility, in addition to orders related to the individual’s condition (exposed, diagnosed, symptoms). For example, New York State’s Exec. Orders 202.4 and 202.14 will be considered qualifying orders.

The first three categories (1-3) and the last (6) can be summarized as employee paid leave to care for themselves. Categories 4 and 5 relate to the employee’s need to care for someone else. This matters because the employee’s benefits may differ depending on which category qualifies them for EPSL.

Paid Leave Benefits

Full-time employees are entitled to 80 hours of EPSL. Part-time employees are entitled to the number of hours they work on average over a two-week period. Such hours are cumulative, that is eligibility in multiple categories is still subject to the single caps described below.

Employees must be paid at their regular rate of pay, subject to the following caps:

- For leave reasons (1), (2), or (3): employees taking leave are entitled to pay at either their regular rate or the applicable minimum wage, whichever is higher, up to \$511 per day and \$5,110 in the aggregate (over a 2-week period).

- For leave reasons (4) or (6): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$2,000 in the aggregate (over a 2-week period).

- For leave reason (5): employees taking leave are entitled to pay at 2/3 their regular rate or 2/3 the applicable minimum wage, whichever is higher, up to \$200 per day and \$12,000 in the aggregate (over a 12-week period).

Employees must be paid for hours the employee would have been normally scheduled to work even if that is more than 40 hours in a week, subject to the above benefit caps. If applicable, overtime hours may be included in calculating the employee's rate of pay; however, contractual holiday pay shall not be included in the "regular" pay calculation.

If the employee is eligible for 2/3rd pay, as described above, the employee may elect to apply their accrued time (e.g., vacation, personal, sick) to supplement their pay during the applicable leave period.

Documentation Requirements

Per the United States Department of Labor, if an employee seeks paid sick leave under the Emergency Paid Sick Leave Act, the City must require that the employee provide appropriate documentation in support of the reason for the leave, including:

- (1) Employee's name; and
- (2) Qualifying reason for requesting leave; and
- (3) Statement that the employee is unable to work, including telework, for that reason; and
- (4) Date(s) for which leave is requested; and
- (5) Documentation of the reason for the leave (examples: source of any quarantine or isolation order, the name of the health care provider who advised the employee to self-quarantine, etc.).
 - a. If leave to care for individual under (4), employee must also provide name of individual, relationship, and a statement of genuine need.
 - b. If leave to care for child under (5), employee must also provide name of child, name of school or child care provider, and a statement that no other person can care for the child.

Process

In order to obtain paid sick or family leave under this Policy, the employee should follow the following process:

- Provide notice to the City's Office of Personnel & Safety that the employee believes they are eligible and the basis for eligibility.
- Complete the FFCRA request form for emergency paid sick or family leave with supporting documentation described above.
- Any submissions can be done electronically/remotely. **Employees should not come to City Hall if the employee or someone the employee is caring for is under a mandatory or precautionary order of quarantine or isolation.**
- Once the employee's request documentation is submitted, the City will review and make a determination granting the request, denying the request due to lack of eligibility, or determining a need for more information/documentation, within three business days.

- The City determination shall be in writing.
- If eligible, City will provide the employee up to 80 hours of paid sick leave, as applicable.
- If the employee exhausts emergency paid sick leave under the federal and state employee benefits laws, or is ineligible, the employee may still qualify for leave under additional City policies, including FMLA and ADA policies.
- Forms are also available upon request from the Office of Personnel & Safety. Email Personnel at lpstestani@cityofbinghamton.com or pakeppler@cityofbinghamton.com or call 607.772.7008.

B. EMERGENCY FAMILY MEDICAL LEAVE ACT ELIGIBILITY & PROCESS

The Emergency Family Medical Leave Act (EFMLA) is in addition to the Emergency Paid Sick Leave (EPSL) explained above. Both are written into the Families First Coronavirus Response Act (FFCRA).

However, under the FFCRA, City employees that are Emergency Responders may be excluded from EFMLA coverage, unless exceptional circumstances exist. Emergency Responders are employees in the following departments, with some exceptions for administrative staff: Police Bureau, Fire Bureau, Public Works, Water & Sewer, Parks & Recreation, Maintenance, Code Enforcement, and Building & Construction. Please see Paid Leave for Emergency Responders, addressed in Section III(C) below.

Eligibility

In order to be eligible, the employee must:

- (1) Have been an employee for at least 30 days; and
- (2) Be unable to work or telework due to:
 - a. Employee's need to be able to care for a child under 18, or a child who is 18 years of age or older and incapable of self-care because of a mental or physical disability, due to school or daycare closing; or
 - b. Employee's need to be able to care for a child under 18, or a child who is 18 years of age or older and incapable of self-care because of a mental or physical disability, because the childcare provider is not available due to this public health emergency.

If the need for expanded family and medical leave is foreseeable, an employee shall provide the City with notice of the leave as soon as practicable.

Leave Period and Benefits

Pursuant to the City's existing FMLA policy, the City will require that an employee take leave that would be available to the employee to care for a child, such as vacation or personal leave or paid time off, concurrently with the latter 10 weeks of expanded family and medical leave. For such time, the City will pay the employee a full day's pay for that day.

Employees may be eligible for up to 12 weeks of leave under EFMLA. The first two weeks employees have the option of applying their own accrued time, the up to 80 hours

available under the federal EPSL (if qualifying category), or under NYS Quarantine Law (if qualifying category). The City cannot require the employee to take one or the other. It is at their option.

After those two weeks, employees are entitled to 2/3 regular rate of pay (max rate \$200/day, max total \$10,000) for the remaining 10 weeks. If an employee applies EPSL to the first two weeks, then there is a \$12,000 cap over the full 12 weeks.

If the employee is eligible for 2/3rd pay, as described above, the employee may elect to apply their accrued time (e.g., vacation, personal, sick) to supplement their pay during the applicable leave period.

Documentation Requirements

Per the US Dept. of Labor, if an employee seeks to take expanded family and medical leave to care for their child whose school or place of care is closed or child care provider is unavailable due to COVID-19, the City shall require the employee to provide appropriate documentation in support of such leave, in the same way the City would for conventional FMLA leave requests.

Documentation must include:

- (1) Name of child
- (2) Name of school if closed
- (3) Name of child care provider if no longer available
- (4) Statement that no other person can care for the child
- (5) Date the need commenced and estimated end date

A school or daycare closure letter should be submitted with the request. However, an email from a parent-employee explaining (1) school/daycare closure, (2) why they need to be the caretaker, and (3) why they cannot telework during such care may also suffice.

Process

In order to obtain EFMLA under this Policy, the employee should follow the following process:

- Provide notice to the City's Office of Personnel & Safety that the employee believes they are eligible and the basis for eligibility.
- Complete the FFCRA request form for EFMLA with supporting documentation described above.
- Any submissions can be done electronically/remotely. **Employees should not come to City Hall if the employee or someone the employee is caring for is under a mandatory or precautionary order of quarantine or isolation.**
- Once the employee's request documentation is submitted, the City will review and make a determination granting the request, denying the request due to lack of eligibility, or determining a need for more information/documentation, within three business days.
- The City determination shall be in writing.
- If eligible, City will provide the employee up to 10 weeks of paid sick leave at 2/3rd pay, as applicable.

- The employee must elect how they wish to apply time for the two weeks prior to the commencement of the 10 week period.
- If the employee exhausts EFMLA, or is ineligible, the employee may still qualify for leave under additional City policies.
- Forms are also available upon request from the Office of Personnel & Safety. Email Personnel at lpstani@cityofbinghamton.com or pakeppler@cityofbinghamton.com or call 607.772.7008.

FMLA definitions, the City's FMLA policy, and the City's rolling calendar year are still applicable and may effect total EFMLA time available.

C. PAID LEAVE FOR EMERGENCY RESPONDERS

Under the FFCRA, employees in the following departments are categorized as emergency responders during the COVID-19 pandemic, with some exceptions for administrative staff: Police Bureau, Fire Bureau, Public Works, Water & Sewer, Parks & Recreation, Maintenance, Code Enforcement, and Building & Construction.

Although under the FFCRA the City may exclude emergency responders from paid leave coverage, the City of Binghamton has adopted this policy based on the guidelines set forth by USDOL. Under this policy, emergency responders are not eligible for paid leave under FFCRA EPSL criteria numbers 4 and 5 (care for others) or EFMLA unless exceptional circumstances exist. For all emergency responders, the Personnel Department will conduct a case-by-case review regarding eligibility for paid leave coverage.

An emergency responder who is ordered to work on site, and safely able to work on site, must do so, subject to vacation, personal, and sick time leave benefits and procedures per applicable union contract. Failure to report to work may be subject to discipline.

If an emergency responder is not safely able to work on site, but is able to telework, and such telework is available, they must do so. If an emergency responder is able to telework, but chooses not to, they may be subject to discipline.

Consistent with FFCRA Categories 1-3 and NYSQL Category 1, an emergency responder will be considered unable to safely work on site and/or unable to telework if:

- (1) Mandated by NYSDOH COVID Protocols and their symptoms prevent them from teleworking, provided such telework is available;
- (2) The employee is (a) under an order of quarantine or isolation from the NYS Department of Health, Broome County Health Department, or health care provider, and (b) such an order is consistent with NYSDOH COVID Protocols, and (c) their symptoms prevent them from teleworking, provided such telework is available; or
- (3) The employee cannot work due to symptoms of COVID-19 and is seeking a diagnosis.

If an emergency responder is showing symptoms of COVID-19, they shall immediately contact their personal healthcare provider or virtual health clinic, such as nyuhs.org/virtualhealth, and undergo an evaluation/virtual appointment. The City will follow recommendations made by

healthcare providers, NYS Dept. of Health, and/or Broome County Health Department if an employee tests positive. Where there is a conflict between the NYSDOH protocols and a local health department or provider, the NYSDOH Protocol will control, unless exceptional circumstances exist.

Emergency responders, subject to the above criteria, qualify for paid leave under EPSL for up to 14 days:

- (1) For the time period ordered by the NYS Department of Health or the Broome County Health Department related to COVID-19 that is consistent with NYSDOH COVID Protocols;
- (2) For the time period recommended in a letter to quarantine or isolate due to COVID issued by the employee's healthcare provider that is consistent with NYSDOH COVID Protocols;
- (3) For the time period the employee actually takes to contact and undergo evaluation by a health care provider; and
- (4) If the healthcare provider instructs the emergency responder to take a COVID-19 test, the time period awaiting the results of such a test.

Any time beyond the time period actually ordered by the NYS Dept. of Health, Broome County Health Department, or health care provider that is consistent with NYSDOH Protocols, or while seeking a diagnosis, may only be granted due to exceptional circumstances, and shall be determined on a case-by-case basis by the Personnel Department. Any additional days, if approved, may result in the emergency responder taking their own accrued time.

The Personnel Department's determinations will be guided by the NYSDOH COVID Protocols and the need for emergency responders during the pandemic. The City will provide emergency responders with necessary protective equipment, based on availability and need.

IV. FMLA AND ADA PROCESS

The City's FMLA Policy and procedure still apply, although documentation and leave requirements will be more relaxed to accommodate an employee's public health concern. The City understands that employees with underlying illnesses or over the age of 70 may have concerns regarding working on site, even if those employees perform essential work for the City.

Even if the employee does not meet the eligibility requirements under the federal and state quarantine laws, the City may be able to offer a leave accommodation under its other policies.

The employee should contact the Office of Personnel & Safety if they are particularly concerned regarding working on site due to an underlying illness/condition or elderly age. The employee may be required to put their request in writing, i.e. FMLA request. Supporting medical documentation standards, while usually strictly required for both FMLA and ADA, will be relaxed to accommodate limited health care access during this pandemic.