

Leader Guide: Team Member Request for Religious Accommodation Under the No Beard Policy

To help reduce risk of exposure, effective 4/2/2020 a no beard policy has been implemented for team members wearing an N-95 during aerosolizing generating procedures. Beards and facial hair can prevent proper fitting and sealing of N95 masks worn during aerosolizing generating procedures. This requirement is another measure to ensure our team members are being kept safe during this pandemic.

Team members who are requesting a religious accommodation should contact their leader. Leaders who receive a request for religious accommodation from their team member, should reach out to the AARC for partnership in navigating the team member's religious accommodation request. Once you connect with an AARC Consultant, and you've discussed the scenario, you will be asked to have your team member complete the "Request for Religious Accommodation" form. Once your team member has completed this form, please ensure you submit it to the AARC Consultant with whom you are partnering, right away. From there, your AARC Consultant will partner with you to consider and respond to your team member's request.

Leaders may contact the AARC:

- In WI by calling 262-957-8300 or by opening a case online through My HR Navigator
- In IL by calling 847-685-1447 or by opening a case online through Self Service

Several important considerations must be made when considering a team member's request for religious accommodation under the no beard policy:

- Title VII prohibits discrimination against team members based on their religion and it also affirmatively requires reasonable accommodation of religious beliefs and practices.
- Absent proof of an "undue hardship" we are required to offer an accommodation for a team member's religious belief once we become aware of the conflict.
- An undue hardship has been defined as one that presents more than de minimis cost or burden on the operation of an employer's business, including higher-than-ordinary administrative cost or safety or security concerns.
- OSHA's protection standards state that respirators shall not be worn when facial hair comes between the sealing surface of the face piece and the face or that interferes with valve function.
- In some instances, there may be an available accommodation that will permit the team member to adhere to the religious practices (such as reassignment) and will allow us to avoid undue hardship. These types of accommodations should be considered unless a tight-fitting mask is necessary because the team member is working in an atmosphere that poses an immediate threat to life or would cause irreversible adverse health effects.
- If we make an accommodation for one team member, we are not required to alter our policy with respect to team members who do not share those religious beliefs.

If you have questions about the request for religious accommodation process, please contact the AARC by calling 262-957-8300 (WI) or by calling 847-685-1447 (IL)