

**FREEDOM OF INFORMATION ACT (FOIA)
POLICIES AND PROCEDURES MANUAL**

OF THE VERNON HILLS PARK DISTRICT

**VERNON HILLS PARK DISTRICT
FREEDOM OF INFORMATION ACT MANUAL**

TABLE OF CONTENTS

APPROVALS AND REVISION LISTING	3
RULES AND REGULATIONS FOR IMPLEMENTATION OF THE FOIA	4
I. Interpretation	
A. Conflicts and Invalidity	4
B. Definitions	4
C. Measure of Time	4
II. Requests for Inspection, Copying, or Certification of Public Records	5
A. Officials Responsible for Responding to Requests	5
B. Request Form	5
C. Request Form Submittal	5
D. Request form Processing	5
III. Responses to Requests	5
A. Time for Response	5
B. Form of Response	6
C. Failure to Respond	7
D. No Obligation to Create New Records	7
IV. Appeals	7
A. Notice of Appeal	7
B. Action on Appeal	7
C. Failure to Decide	7
V. Fees	8
A. Fees Established	8
B. Method and Time of Payment	8
C. Waiver of Fees	8
VI. Park District Obligations	8
A. Organizational Description	8
B. Index of Public Records	9
C. Records Stored by Electronic Data Processing	9
D. Summary of Procedures	9
E. Posting and Mailing Information	9
F. Filing of Notices of Denial	9
ORGANIZATION DESCRIPTION	10
CATEGORIES OF INFORMATION AVAILABLE	12
REQUESTS FOR PUBLIC RECORDS	15
FORMS:	
Request for Public Records (Form 1)	

APPROVALS AND REVISION LISTING

Policy adopted by the Board October 27, 2005
Revised by the Board January 31, 2008
Revised by the Board December 20, 2012
Revised by Administrative Staff November 21, 2024

**VERNON HILLS PARK DISTRICT
RULES AND REGULATIONS FOR IMPLEMENTATION
OF THE ILLINOIS FREEDOM OF INFORMATION ACT (FOIA)**

These guidelines (“FOIA Guidelines”) outline procedures and contain instructions for orderly compliance with the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.* (the Act”), by Vernon Hills Park District (the “District”) and any persons requesting public records from the District (a “Requestor”).

The District will respond to all written requests for inspection or copying of public records in accordance the Act, these FOIA Guidelines, and other applicable law. Under the Act, the District must disclose to any Requestor for inspection or copying all requested public records except public records that are exempted from disclosure by the Act or other applicable law. Requests falling within any of these exemptions may be denied in the sole discretion of the District.

All notices and other communications in connection with a request to inspect or copy records under the Act shall be sent to: Executive Director, or designee Administrative Assistant, Vernon Hills Park District, 635 N. Aspen Drive, Vernon Hills, Illinois 60061. The Park District’s main telephone number is 847-996-6800. The District has Request Forms available for your use in requesting to inspect or obtain copies of public records, and we strongly encourage you to use these forms for this purpose (See attached FORM 1). Additional Request Forms may be obtained from the District and are also available on our website, www.vhparkdistrict.org. The District will respond to all written requests to inspect or copy public records within five working days after receipt of the request.

I. **INTERPRETATION**

A. Conflicts and Invalidity

These FOIA Guidelines do not supersede, nor are they intended to supersede, the provisions of the Act. In the event that these FOIA Guidelines in any way conflict with the Act, the provisions of the Act shall govern and take precedence over these FOIA Guidelines. If any provision of these FOIA Guidelines is deemed illegal or unenforceable, all other provisions and the application thereof shall remain unaffected to the extent permitted by law.

B. Definitions

In addition to the definitions provided in the Act, the following definitions are applicable to these FOIA Guidelines:

1. Director: The Executive Director of the Vernon Hills Park District or his or her designee.
2. Business Hours: 8:30 a.m. to 5:00 p.m. on a working day.
3. Working Day: Any day on which the Administrative Office is open and staffed for regular public business during Business Hours. Working Days are generally Monday through Friday, except recognized legal holidays.

C. Measure of Time

1. Days: In counting the number of days allowed for any response or decision required to be given by the District pursuant to the Act or these FOIA Guidelines, the day on which the request or notice requiring such response or decision was first received shall be included provided such request is received during normal business hours.

2. Supplemental Requests: Supplemental or additional requests to inspect or copy public records shall not relate back to the time of receipt of the initial request. Supplemental or additional requests shall be considered new requests for purposes of determining all applicable time periods.
3. Response Date: All responses and decisions required to be issued by the District pursuant to the Act or these FOIA Guidelines shall be conclusively deemed to have been given as of the date of personal delivery to the person or to the residence of the person entitled to such response or decision or, if mailed, as of the date of mailing, regardless of the date of actual receipt by such person. Each such response and decision shall include a verified proof of service evidencing the method by which, and time at which, such response or decision was delivered.

II. REQUESTS FOR INSPECTION OR COPYING OF PUBLIC RECORDS

A. Officials Responsible for Responding to Requests

The Director shall be the person administratively responsible for receiving and processing all requests to inspect or copy public records filed pursuant to the Act and these FOIA Guidelines. The Director shall be the person with authority on behalf of the District to respond to such requests, and to issue the appropriate notices with respect to such matters. The Director may consult with the District's Attorney before responding to any request to inspect or copy public records.

B. Request Form

All requests to inspect or copy public records must be made in writing to the Director. We recommend that all such requests be filed with the Director on the form attached hereto as FORM 1 or on a form substantially similar to FORM 1 approved by the District ("The Request Form"). Additional Request Forms may be obtained from the District and are also available on our website, www.vhparkdistrict.org. The District will respond to all written requests to inspect or copy public records within five (5) working days after receipt of the request.

C. Request Form Submittal

Completed Request Forms may be filed with the District by mail, overnight courier service or in person. Request Forms submitted in person shall be handed to the Director at the Administrative Office. Request Forms submitted by mail or other means shall be addressed to the Director at the Administrative Office and shall be deemed received only upon actual receipt by the Director on a Working Day, regardless of date of mailing.

D. Request Form Processing

The Director shall stamp or mark each Request Form with the date and time of receipt.

III. RESPONSES TO REQUESTS

A. Time for Response

The Director shall respond to Request Form filed pursuant to Section II of these FOIA Guidelines within five (5) Working Days after such Request Form is received by the District.

Extension of Time

If the Director determines that additional time is needed and allowed under the Act to respond to a Request Form filed pursuant to Section II of these FOIA Guidelines, the Director shall notify the Requestor in writing of such determination, of the reasons requiring the extension, and of the length of the extension, which shall not in any event exceed five (5) Working Days.

B. Form of Response

1. Disclosure of Public Records

- (a) If the Director determines that the Act requires disclosure of all or any part or portion of any public records requested on a Request Form filed pursuant to Section II of these FOIA Guidelines, the Director shall cause those records to be produced for inspection or copying.
- (b) Except as otherwise specifically authorized by the Director, only District personnel shall be permitted to search District files, records or storage areas; to use District equipment; or to make copies of District public records.
- (c) Public records may not be removed from the Administrative Offices.
- (d) Public records may be inspected, or copies of public records obtained, during Business Hours at the Administrative Offices.
- (e) Because space is limited, Requestors must make arrangements in advance with the Director for a specific appointment to inspect public records at the Administrative Offices.
- (f) The Requestor shall be required to pay all copying fees in advance of receiving copies of any public records.
- (g) Requests for the reproduction of any public records which are in the form of tape recordings will be honored in accordance with the provisions of the Act and these FOIA Guidelines.
- (h) Upon inspection or delivery of copies of the requested public records the Requestor may be required to acknowledge such fact in writing.

2. Categorical Requests

- (a) Requests calling for all records falling within a category shall be complied with unless the Director determines that compliance with the request would be unduly burdensome, there is no way to narrow the request, and the burden on the District outweighs the public interest in the information.
- (b) Before making such a determination, the Director shall extend to the Requestor in writing an opportunity to confer in an attempt to reduce the request to manageable proportions.
- (c) If the Requestor responds to the Director's written notice within fourteen (14) Working Days the Director shall respond to the Request Form, or to the Request Form as narrowed, within five (5) Working Days following the date of the Requestor's response. The Director's response may take any form specified in the Subsection III.B.

- (d) If the Requestor does not respond to the Director's written notice within fourteen (14) Working Days the Director shall deny the request pursuant to Paragraph III. B(3) below.
- (e) Repeated requests for the same records by the same person or on behalf of the same organization or group shall be deemed unduly burdensome.

3. Denial

If the Director determines that all or any part or portion of any public records requested on a Request Form filed pursuant to Section II of these FOIA Guidelines are not subject to disclosure under the Act, the Director shall notify the Requestor in writing of such determination ("Notice of Denial"). The Notice of Denial shall state the reason for the denial and notify the Requestor of the Requestor's right to appeal the Director's denial to the President of the Park Board (the "President").

C. Failure to Respond

If the Director fails to respond to a Request Form properly filed pursuant to Section II of these FOIA Guidelines, the request shall be deemed to be denied as of the last day permitted for such response.

D. No Obligation to Create New Records

Neither the Act nor these FOIA Guidelines create an obligation on the part of the District to maintain or prepare any public record which was not maintained or prepared by the District at the time when the Act became effective.

IV. APPEALS

A. Notice of Appeal

If a Requestor disagrees with a Notice of Denial and wishes to appeal, then such Requestor must file a written notice of appeal with the President ("Notice of Appeal").

B. Action on Appeal

Upon receipt of a Notice of Appeal, the President shall review the public records requested and make a determination as to whether such public records must be disclosed pursuant to the Act. Within five (5) Working Days after the receipt of a Notice of Appeal, the President shall notify the Requestor of such determination. Such notice shall be given in writing, and if access to the requested records is denied, shall state that the Requestor has a right to judicial review of the decision.

C. Failure to Decide

If the President fails to issue a decision granting or denying an appeal within five (5) Working Days after receipt of a Notice of Appeal, the appeal shall be deemed to be denied as of the last day permitted for issuing such decision.

IV. FEES

A. Fees Established

Unless fees are waived or reduced pursuant to Subsection V.C below, each Requestor shall pay the following fees for copying and certification of public records:

1.	Copies (8 1/2" x 11")	No Charge for first 50 pages \$0.15 per page over 50
2.	Copies (Oversize)	Actual cost to reproduce
3.	Certification	\$0.50 per page/document

Where the services of an outside vendor are required to copy any public record, including tape recordings, the actual charges of such outside vendor shall be the fees for copying such records, notwithstanding the fees stated above.

Such fees are hereby found to be no more than necessary to reimburse the District for the actual cost of reproducing and certifying public records requested pursuant to the Act and these FOIA Guidelines.

B. Method and Time of Payment

Payment of all required fees must be made in cash, by cashier's or certified check, or by money order prior to the copying or certification of any public record.

C. Waiver of Fees

If the Requestor seeks a waiver or reduction of the fees set forth in Subsection V.A. the Requestor must so state and also state the principal purpose of the request. If the stated purpose of the request is in the public interest, as defined by FOIA, the fees shall be waived or reduced by the Director, as appropriate. Any request for fee waiver or reduction must be indicated on the Request Form at the time the Request Form is filed.

The Director may consider the number of requested public records and the cost and necessity of copying them in setting the fee waiver or reduction amount.

V. DISTRICT OBLIGATIONS

A. Organizational Description (Exhibit A)

The Director shall, at least once each fiscal year, produce and make available for inspection, copying, and mailing to any person requesting it, a brief description of the District. Such description shall include:

- a short summary of the District's purpose,
- a block diagram of its functional subdivisions,
- the approximate number of its full and part-time employees,
- the total amount of its operating budget
- the number and location of each of its offices, and
- the identification and membership of the Park Board and of all of its standing and special committees and other advisory bodies.

- B. Index of Public Records (Exhibit B)
The Director shall maintain and make available for inspection and copying a current list of all types or categories of public records under the control of the District which were prepared or received by the District after July 1, 1984. The list shall be reasonably detailed in order to aid persons in obtaining access to the public records of the District.

- C. Records Stored by Electronic Data Processing
The Director shall furnish upon request a description of the manner in which public records of the District stored by means of electronic data processing may be obtained in a form comprehensible to persons lacking knowledge of computer language or printout format.

- D. Summary of Procedures
The District shall display at each of its administrative or regional offices, make available for inspection and copying, and send through the mail if requested, a brief description of the procedures established by these FOIA Guidelines.

- E. Posting and Mailing of Information
The Director shall keep posted at the Administrative Offices, and shall make available for inspection and copying, and send through the mail to any person making a request therefore, copies of the Organizational Description prepared pursuant to Subsection VI. A. above and the Index of Public Records prepared pursuant to Subsection VI. B. above.

- F. Filing of Notices of Denial
The Director shall retain copies of all Notices of Denial in a single file at the Administrative Offices open to the public and indexed according to the type of exemption asserted and, to the extent such categorization is feasible, the type of records requested.

**VERNON HILLS PARK DISTRICT
EXHIBIT A**

Mission Statement:

Conserving nature, supporting wellness, and inspiring leisure for all.

Governance:

The Vernon Hills Park District, a unit of local government founded in November 1983, and organized and incorporated under the laws of the State of Illinois, is governed by a Board of five elected Commissioners. The Park Board sets policies, approves the operating budget for the District and appoints an Executive Director to administer the District’s operations. Board meetings are normally held the fourth Thursday of each month at 6:00 p.m. at the Sullivan Community Center, 635 N. Aspen Drive, Vernon Hills, unless otherwise posted. Also see the attached District organizational chart.

Commissioners June 2024 through May 2025:

President David J.E. Doerhoefer	term expires 2029
Vice President Carol Sente	term expires 2027
Bruce A. Robbins	term expires 2029
Janice Giraldo	term expires 2027
Abra Jacobs	term expires 2025

Board Committees:

1. Park District/Village Liaison-Commissioners David Doerhoefer and Carol Sente
2. District 73 Liaison -Commissioner Abra Jacobs
3. Park Advisory Committee – Commissioner Janice Giraldo
3. Audit Committee- Commissioner Bruce Robbins
4. Board Development Committee- Commissioner Carol Sente

Operating Budget June 2024 through May 2025: \$10,387,218.00

Office Locations:

1. Dolores Sullivan Community Center, 635 N. Aspen Drive, Vernon Hills 847 996-6800
Contains District’s Administrative Offices, Recreation Supervisors offices, preschool, dance rooms, community rooms, meeting rooms and gymnasiums.
2. Lakeview Fitness Center, 700 N. Lakeview Parkway, Vernon Hills, 847-996-6330
Contains Facility Manager, Staff and Childcare offices, Fitness Center, Aquatic Center, Adult Spa Area, Group Exercise Studio and Childcare Facilities.

Staffing:

Full-time: 47

Part-time and Seasonal: 191

Executive Director	Matthew LaPorte	847 996-6930	mattl@vhparkdistrict.org
Supt. Finance & HR	Jessica Mitchell	847 996-6934	jessicam@vhparkdistrict.org
Recreation Superintendent	Tom Ritter	847 996-6802	tomr@vhparkdistrict.org
Parks Superintendent	Mark Fleishman	847 996-6817	markf@vhparkdistrict.org
Marketing & Communication Manager	Cheryl Buhmann	847 996-6933	cherylb@vhparkdistrict.org
Facility Manager	Lacy Marinenko	847-996-3485	lacym@vhparkdistrict.org

FOIA- How to Get Information:

The Vernon Hills Park District, as a public agency, adheres to the Illinois Freedom of Information Act (FOIA). Copies of the District's Freedom of Information Act policy and procedures for requesting information, including request forms are available at the Sullivan Community Center and are available on the District's website www.vhparkdistrict.org.

The FOIA Officer's for the Vernon Hills Park District are Executive Director, Jeff Fougousse and Administrative Assistant, Amy Darling. Requests can be mailed to the Sullivan Community Center, 635 N. Aspen Drive, Vernon Hills, IL 60061. The following fees may apply:

Copies (8 ½ x 11)	No charge for first 50 pages \$0.15 per page over 50
Copies (Oversize)	Actual cost to reproduce
Certification	\$0.50 per page/document

**VERNON HILLS PARK DISTRICT
EXHIBIT B**

**CATEGORIES OF INFORMATION AVAILABLE
THROUGH THE FREEDOM OF INFORMATION ACT**

The Vernon Hills Park District has prepared this list of the categories and types of records under its control pursuant to Section 5 of the Illinois Freedom of Information Act (5 ILCS 140/1 *et seq*) ("FOIA").

Please Note: Nothing contained in this list affects the Park District's ability to refuse to disclose public records for inspection or copying which are exempt under Section 7 of FOIA.

I. BOARD OF PARK COMMISSIONERS

- A. Matters adopted by action of the Board of Park Commissioners
 - 1. Ordinances
 - 2. Resolutions
 - 3. Policy Statements
 - a. Americans with Disabilities Act
 - b. Blood Borne Pathogens
 - c. Family and Medical Leave
 - d. Risk Management
 - e. Crisis Management
 - f. Hazardous Communication
 - g. Administrative Policy
 - h. Personnel Policy
 - i. Harassment
 - j. Resident/Non-Resident Fees
 - k. Investment
 - l. Employment Policies
 - (1) Equal Employment Opportunities
 - (2) Drug or Alcohol Testing
 - m. Interpretations of Policy adopted by the Board
 - n. Other
 - 4. Other Matters
- B. Board Meetings
 - 1. Minutes of meetings open to the public including the name of every official and the final voting in all proceedings.
 - 2. Minutes of meetings closed to the public where the Board has made minutes available to the public under Section 2.06 of the Open Meetings Act.
 - 3. Board Meeting Packets and Agendas.
- C. Board Committee Meetings
 - 1. Minutes of meetings open to the public including the name of every official and the final voting in all proceedings.
 - a. Standing Committees
 - b. Special Committees

- c. Committee of the Whole
 - d. Citizen Advisory Committees
 - 2. Minutes of meetings closed to the public where the Board has made minutes available to the public under Section 2.06 of the Open Meetings Act.
 - 3. Board Committee Meeting Packets and Agendas.
- D. Board Membership
 - 1. List of names of current Board members
 - 2. Appointment of Vacancies
 - 3. Oath of Office
- E. Elections
 - 1. Candidate Packets
 - 2. Nominating Petitions
 - 3. Referenda
 - 4. Abstract of Votes
 - 5. Certification of Votes
- F. Director's Reports to the Board and/or Committees

II. **FINANCIAL RECORDS**

- A. Revenue
 - 1. Tax Revenue
 - 2. User Fee Revenues
 - 3. Grants, Donations and Revenue from other sources
- B. Budget and Appropriations
- C. Audit Reports
- D. Treasurer's Reports
- E. Expenditures
 - 1. Voucher Lists
 - 2. Receipt and Disbursement Ledgers & Documentation

III. **CONTRACTS**

- A. Grants
 - 1. Applications
 - 2. Agreements
- B. Personal Property Purchases
- C. Concessions
- D. Licenses
- E. Maintenance/Service Agreements
- F. Intergovernmental Cooperation Agreements
- G. Professional or Personal Services Agreements
- H. Construction (included under Capital Projects)

IV. **FINAL REPORTS, STUDIES OR PUBLICATIONS ("REPORTS")**

- A. Staff Reports
- B. Consultant Reports
- C. Grant Reports

V. REAL AND PERSONAL PROPERTY ASSETS

- A. Real Property
 - 1. Inventory
 - 2. Title
 - 3. Purchase or Sale Documentation
 - 4. Maps, Aerial photographs, surveys
 - 5. Tax exemption matters
 - a. Affidavits & Certificates
 - 6. Leases Park District as Lessor & Lessee
 - 7. Licenses
 - 8. Use Permits
 - 9. Zoning Applications
- B. Fixed Assets & Inventory

VI. CAPITAL PROJECTS

- A. Request for Bid Packages
- B. Specifications
- C. Bid Submissions
- D. Contracts
 - 1. Construction
 - 2. Architectural
 - 3. Engineering
 - 4. Payment Applications and Supporting Documentation

VII. INSURANCE POLICIES AND CERTIFICATES OF INSURANCE

VIII. LISTS OF NAMES, SALARIES, JOB TITLES AND DATES OF SERVICE FOR PARK DISTRICT EMPLOYEES AND OFFICERS

IX. CORRESPONDENCE

X. MEMORANDA

XI. ADMINISTRATIVE MANUALS AND PROCEDURAL RULES AND INSTRUCTIONS TO STAFF

XII. FINAL OPINIONS AND ORDERS RELATING TO ADJUDICATION OF LITIGATION AND SETTLEMENT AGREEMENTS

**VERNON HILLS PARK DISTRICT
LAKE COUNTY, ILLINOIS**

**REQUESTS FOR PUBLIC RECORDS
INSTRUCTIONS AND INFORMATION**

1. In Section 1, describe in detail the public records that you wish to inspect or to have copied. Use a separate sheet if necessary.

Indicate whether you wish only to inspect the public records at the Administrative Offices or to have the public records copied by checking the appropriate space to the right of each record described.

2. By submitting this Request Form, you are agreeing to pay to the District, in advance of receiving copies of any public records, the copying fees set forth in Section II below.
3. If the Requestor seeks a waiver or reduction of the fees set forth in Subsection II.B, the Requestor must so state and also state the principal purpose of the request. If the stated purpose of the request is in the public interest, as defined by FOIA, the fees shall be waived or reduced by the Director. To be considered for such a waiver or reduction, the Requestor must also separately sign the statement set forth in Subsection II. B.
4. You must provide the information requested in Section III.
5. You must sign the statement set forth in Section IV.

The District will disclose the public records requested on this Request Form within five (5) Working Days after the receipt of this Request Form, unless the five day period is extended as provided by law or the request is denied. All extensions and denials will be in writing and will state the reasons therefore. A denial may be appealed to the Park Board President, who will respond to such appeal within five (5) Working Days after the receipt of the notice of appeal. All appeals must be in writing. If the appeal is denied by the Park Board President, judicial review is available under Section 11 of the Illinois Freedom of Information Act 5 ILCS 140/1 *et seq.* For more detailed information, please consult the "Vernon Hills Park District, Guidelines for Compliance with the Illinois Freedom of Information Act", which is available from the Executive Director.

TO: Executive Director, Matthew LaPorte
Vernon Hills Park District
635 N. Aspen Drive
Vernon Hills, IL 60061

I. Request for Records

I hereby request the right to inspect or to obtain copies of the following public records of the District:

Records Requested

	Inspect	Copies
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

II. Agreement to Pay Fees

A. Unless a waiver is requested and approved pursuant to Paragraph B of this Section, I agree to pay the following fees for all public records copied at my request:

- | | | |
|----|---------------------|---------------------------------------|
| 1. | Copies – 8 ½” x 11” | No Charge for first 50/\$0.15 over 50 |
| 2. | Copies – Oversize | Actual Charge to Reproduce |
| 3. | Certification | \$0.50 per page/document |

I further acknowledge and agree that, if the services of an outside vendor are required to copy any public record, including tape recordings, I shall pay the actual charge that the Park District incurs in connection with such copying services, notwithstanding the fees stated above.

B. I request a waiver of the fees set forth in Paragraph A of this Section, and, in support of such request, I do hereby state that the principal purpose of my request is:

Signature of Requestor

III. Identification of Requestor

A. Printed name of Requestor: _____

B. Address for Responses, Decisions, and Communications:

C. Telephone Numbers of Requestor:

Daytime: _____

Evening: _____

D. Email Address of Requestor: _____

IV. Signature of Requestor

By signing this Request, I acknowledge and represent that I have reviewed and understood the Vernon Hills Park District's Guidelines for Compliance with the Illinois Freedom of Information Act and that all of the information provided in support of this request is true and accurate.

Signature of Requestor

Date

FOR PARK DISTRICT USE ONLY

Received by Vernon Hills Park District, Lake County, Illinois

Date: _____

Time: _____

Method of Delivery: Personal Delivery during Business Hours

Personal Delivery after Business Hours

Mail Delivery during Business Hours

Mail Delivery after Business Hours

District employee receiving request:

Name: _____

Title: _____

Signature: _____

Park District employee responsible for compiling response:

Name: _____

Title: _____