PUBLIC EMPLOYMENT - ILLINOIS

International Association of Fire Fighters, Local 50 v. City of Peoria

Supreme Court of Illinois - January 21, 2022 - N.E.3d - 2022 IL 127040 - 2022 WL 186577

Firefighters' labor union brought declaratory-judgment action against city, asserting that definitions in city ordinance regarding firefighters' line-of-duty benefits were inconsistent with section of Public Safety Employee Benefits Act requiring city to pay entire premium of health insurance plans of firefighters catastrophically injured in the line of duty and their families.

The Circuit Court granted union's motion for summary judgment and denied city's motion for summary judgment. City appealed. The Appellate Court affirmed. City filed petition for leave to appeal, which was allowed.

The Supreme Court held that:

- Requiring city to follow Supreme Court's decision that defined "catastrophic injury" when city was enacting ordinance did not violate separation-of-powers principles;
- Act's section limiting exercise of concurrent authority by home rule units was sufficiently specific to prohibit city from enacting ordinance that contained definitions that were inconsistent with Act;
- Definition of "catastrophic injury" in ordinance was inconsistent with Act and thus was preempted; and
- Definition of "injury" in ordinance was inconsistent with Act and thus was preempted.

Requiring city, a home rule unit, to follow Supreme Court's decision that defined "catastrophic injury," for purposes of section of Public Safety Employee Benefits Act requiring city to pay entire premium of health insurance plans of firefighters catastrophically injured in the line of duty and their families, when city was enacting ordinance regarding firefighters' line-of-duty disabilities did not violate separation-of-powers principles; Supreme Court was not lawmaking or legislating but rather was determining legislative intent, and General Assembly had not amended Act to supersede decision.

Public Safety Employee Benefits Act's section limiting exercise of concurrent authority by home rule units was sufficiently specific to prohibit city from enacting ordinance that contained definitions that were inconsistent with Act's requirement that city pay entire premium of health insurance plans of firefighters catastrophically injured in the line of duty and their families, though section did not state that home rule units were not allowed to independently define terms "catastrophic injury" and "injury"; General Assembly was not required to anticipate every way that home rule unit may attempt to circumvent Act's requirement via ordinance, and section required that concurrent exercise of home rule units' authority be consistent with respective statutory schemes.

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