



Department: All Departments	Approvals Human Resources
Policy: COVID 19 Vaccination Policy	Administrator: Jeremy Schultes, CEO
Effective Date: November 5, 2021	Board of Directors

Purpose: PHS has adopted this policy on mandatory vaccination to safeguard the health of our employees from the hazard of COVID-19. *Considering the continued COVID-19 pandemic and efforts to keep our workforce and patients/residents safe, PHS will require that eligible staff as defined above show proof of COVID-19 vaccination as a condition of continued employment or contract status.*

Applies to:

This policy applies to “eligible staff” which includes covered Philip Health Services (PHS) facility employees, non-employed contract workers, licensed practitioners, students, trainees, and volunteers; and individuals who supply any care, treatment, or other services at PHS covered facilities and/or for PHS patients/residents under contract or other arrangement.

Does Not Apply to: Any fully remote worker that does not have any direct contact with patients/residents, or any eligible staff as defined above.

Considering the continued COVID-19 pandemic and efforts to keep our workforce and patients/residents safe, PHS will require that eligible staff as defined above show proof of COVID-19 vaccination as a condition of continued employment or contract status.

Vaccine Types: There are several distinct types of COVID-19 vaccines available. PHS does not recommend one vaccine over another. Workforce members can choose which vaccine he or she wishes to obtain, so long as they are approved or authorized for emergency use by the US Food and Drug Administration (Pfizer-BioNTech, Moderna, and Johnson & Johnson [J&J/Janssen]), listed for emergency use by the World Health

Organization (e.g., AstraZeneca/Oxford), or if the individual received a vaccine during their participation in a clinical trial.

Vaccination Requirements:

Phase 1: By December 5, 2021, all individuals covered by this policy must have received at a minimum, the first dose of a primary series or a single dose COVID-19 vaccine - prior to those individuals supplying any care, treatment or other services for the applicable facility or its patients/residents.

Phase 2: By January 4, 2022, all individuals covered by this policy must complete the primary vaccination series (except for those who have been granted an exemption from the COVID-19 vaccine or those individuals for whom COVID-19 vaccination must be temporarily delayed, as recommended by the CDC (Centers for Disease Control) (Centers for Disease Control)).

Employees are considered fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine, with, if applicable, at least the smallest recommended interval between doses. Employees must report their vaccination status and to supply proof of vaccination.

Employees may request an exception from this mandatory vaccination policy if the vaccine is medically contradicted for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a disability, or if the provision in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a held religious belief, practice, or observance. Requests for exceptions and reasonable accommodation must be started with Human Resources.

***** Please note:** Individuals covered under this policy who have had a prior COVID-19 infection must still be vaccinated. In addition, individuals covered under this policy are not allowed to supply a recent antibody test to prove vaccination status.

Acceptable Proof of Vaccination Status:

All vaccinated employees must supply proof of COVID-19 vaccination, regardless of where they received vaccination.

One of the following documents is acceptable:

- (a) A copy of the record of immunization from a health care provider or pharmacy.
- (b) A copy of the COVID-19 Vaccination Record Card.
- (c) A copy of medical records documenting the vaccination, a copy of immunization records from a public health or State immunization information system; or

(d) A copy of any other official documentation verifying vaccination with information on the vaccine name, date(s) of administration, and the name of the health care professional or clinic site administering the vaccine.

Proof of vaccination should include the employee's name, the type of vaccination administered, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) that administered the vaccine. In some cases, state immunization records may not include one or more of these data fields, such as clinic site; in those circumstances PHS will still accept the state immunization record as acceptable proof of vaccination.

All employees must inform PHS of their vaccination status.

***** Please note** – an employee's/individual's signed attestation of vaccination is not allowed under this policy.

Paid Time:

- a. Employees and other workforce members who need to take time off from work to obtain the COVID-19 vaccine will be paid up to 4 hours for their time away from work to do so. This would mean a maximum of eight hours of duty time for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of duty time will be granted. Employees who take longer than four hours to get the vaccine must send an email documenting the reason for added time. Any added time requested will be granted, if reasonable, but will not be paid; in that situation, the employee can choose to use PPL if available to cover the added time. If an employee is vaccinated outside of their approved duty time they will not be compensated. ("OSHA (Occupational Safety and Health Administration) COVID-19 Vaccination, Testing and Face Covering ...")
- b. Employees and other workforce members who obtain the COVID-19 vaccine and experience side effects that keep them from being able to report to work to perform their jobs will be compensated for up to 16 hours' time away from work while they recover.
- c. Employees who obtain the COVID-19 vaccine are eligible for a paid leave of absence if they still contract COVID-19. The leave of absence will be paid for up to 80 hours (about 3 and a half days). Thereafter, if a leave of absence is still needed, it will be unpaid, but use of PPL is allowed.

Contracting COVID-19: If the employee or workforce member tests positive for COVID-19, the staff member will need to follow CDC guidelines & PHS policy/procedure and will be removed from the schedule. Employee Health will be notified of all results. PHS will

require employees to promptly notify employee health and their supervisor when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

Return to Work Criteria: For any employee removed because they are COVID-19 positive, PHS will need the employee to work with employee health and PHS will need current CDC guidelines to be followed for the employee to return to work.

Reasonable Accommodations: Employees whose medical condition/disability, or their held religious belief, practice or observance prevents them from getting a COVID-19 vaccine may request to be exempted as a reasonable accommodation, unless it would pose an undue hardship to PHS. Reasonable accommodations may include, but not be limited to, a weekly testing requirement for COVID-19, certain masking requirements and social distancing in the workplace. PHS has accommodation request forms available for making these requests. Please see Human Resources for more information.

COVID 19 Testing: If an employee covered by this policy is not fully vaccinated (if they are granted an exemption from the mandatory vaccination requirement because the vaccine is a contradiction for them), the employee will have to follow this policy for testing.

“Employees who report to the workplace at least once every seven days:” (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”)

- A) Must be tested for COVID-19 at least once every seven days; and (“New Federal Vaccine Rule: Wage and Hour Implications - Law ...”)
- B) Must supplied documentation of the most recent COVID-19 test result to Human Resources no later than the seventh day following the date on which the employee supplied last supplied a test result. (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”)

Any employee who does not report to the workplace during a period of seven or more days: (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”)

- A) Must be tested for COVID-19 within seven days prior to returning to the workplace; and (“OSHA’s Emergency COVID-19 Vaccination Rule Is Here ...”)
- B) Must supply documentation of that test result to Human Resources upon return to the workplace. (“COVID-19 Vaccine Program Sample Letter and Policy ...”)

If an employee does not supply documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace until they supply a test result. (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”)

Employees who have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider, are not needed to undergo COVID-19 testing for 90 days (about 3 months) following the date of their positive test or diagnosis. Employees must work with employee health on this.

Face Coverings: All employees must follow the masking requirement of the facility. If an employee covered by this policy is not fully vaccinated (if they are granted an exemption from the mandatory vaccination requirement because the vaccine is a contradiction for them), PHS will require the employee to wear a face covering. “Employees who are not fully vaccinated must wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes.” (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”) The following are exceptions to PHS’s requirements for face coverings:

1. “When an employee is alone in a room with floor to ceiling walls and a closed door.” (“1910.501 - Vaccination, testing, and face coverings ...”)
2. For a limited time, while an employee is eating or drinking at the workplace for identification purposes in compliance with safety and security requirements. (“OSHA COVID-19 Vaccination, Testing and Face Covering ...”)
3. Where PHS has decided that the use of face coverings is infeasible or creates a greater hazard.

New Hires: All new employees must follow the vaccination requirements outlined in this policy as soon as practical and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

Termination of Employment: Any individual’s employment this policy applies to who does not show proof of vaccination (i.e., are considered unvaccinated) or who are not granted an accommodation due to medical condition/disability or held religious belief, practice or observance will be ended from PHS (or their contract will be ended).

Confidentiality and Privacy: All medical information collected from individuals, including vaccination information, test results, and any other information obtained because of testing, will be treated by applicable laws and policies on confidentiality and privacy.

Vendors: PHS requires that individuals not covered under this policy, such as vendors (non-workforce members), who come into a covered facility follow personal protective equipment protocol (PPE) requirements and follow any applicable CDC guidelines (e.g., wearing masks and keeping 6 feet social distancing) for so long as they are in the facility. PHS will not require vaccination or testing of vendors.