

## Policy: OP007 – COVID-19 Vaccination for Staff

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**I. Purpose:**

In accordance with Affiliated Physicians (AP) duty and desire to provide and maintain a safe and healthy workplace in the midst of the COVID-19 pandemic, AP is adopting the following Vaccination Policy with the intent to safeguard its employees and their families, its clients, patients and visitors, as well as the members of our communities we serve.

This Policy is intended to comply with all applicable federal, state and local rules and regulations, and is based on guidance from the Centers of Disease Control and Prevention (CDC), the Equal Employment Opportunity Commission (EEOC), as well as that of local health authorities, as applicable, and as of its Effective Date

This Policy extends to all employees and contract staff; present, prospective and newly hired.

**II. Policy:**

- a. Based on AP’s public/community health and wellness business lines and the increased safety concerns surrounding employees contracting and spreading the potentially fatal SARS-CoV-2 virus and its mutations that cause COVID-19, all AP staff and contractors that work in an office or who work with patients are required to receive the COVID-19 vaccine.
- b. All staff working for AP, including agency or contractors, must provide attestation of vaccination status effective as of date of this Policy for all existing staff and for all incoming newly hired staff.
- c. All staff will be required to provide updated vaccination status upon hire and as requested by AP thereafter.

- d. There may be extenuating circumstances preventing someone from receiving a COVID-19 vaccine, such as religious beliefs or documented medical exemptions. This may be indicated on the 'vaccination status questionnaire' completed upon hire and as requested by employer.
- e. All exemption requests must be submitted to AP HR prior to September 20<sup>th</sup>, 2021 if employed prior to such date, or upon hire.
- f. AP may provide reasonable accommodations, based on the Title VII of the *Civil Rights Act of 1964*, and the *Americans with Disabilities Act* for any staff member with a known and documented disability and/or sincerely held religious beliefs that preclude vaccination.
- g. All staff who are not fully vaccinated at policy effective date will be required to meet full vaccination status within 45 days of notice. All patient-facing and in-office staff must have at least one (1) dose of Moderna or Pfizer by September 20<sup>th</sup>, 2021 or must have received the Janssen COVID-19 vaccine dose by September 20<sup>th</sup>, 2021.
- h. All staff will have access to COVID-19 vaccine and be afforded time off for vaccination by the company upon request and at no cost.
- i. All full-time, part-time, or contractors who work remotely are encouraged, but not required to obtain COVID vaccination.
- j. Any and all staff who are out of compliance with Policy OP007 may be involuntarily terminated without notice.

**III. Procedure:**

Consistent with the CDC's guidance, as well as that of other state public health agencies, to prevent contracting or spreading the COVID-19 infection and as an integral measure towards the general public's health and safety, AP is, as of the date of this Policy (September 20<sup>th</sup>, 2021), implementing the following practices:

**1. COVID Vaccination Required**

- i. All prospective, newly hired, and/or contractors that work in an Affiliated Physicians office, in the community, and/or with direct patient contact must receive the COVID-19 vaccination, in full, PRIOR TO EMPLOYMENT, unless otherwise exempted from this Policy by an approved accommodation pursuant to the interactive process. As applicable, new employees are required to, at the latest, begin compliance with this Policy during the pre-employment onboarding process, and shall not be assigned to any work until fully vaccinated.
- ii. Fully and properly vaccinated under this Policy includes all individuals who have received:
  - 1. Two (2) doses of a 2-dose mRNA COVID vaccine series, such as Pfizer or Moderna vaccines; OR
  - 2. One (1) dose of a single-dose viral vector vaccine, such as Janssen's COVID vaccine

If an employee does not meet these requirements, that employee is NOT fully vaccinated in accordance with this Policy and may not accept any assignments until 'full vaccination' status has been reached.

**2. Fully Vaccinated Employees**

- a. Any fully vaccinated employees under this Policy who: (1) experiences side effects in day(s) following receipt of the COVID-19 vaccine(s), or (2) subsequently contracts the COVID-19 virus, or (3) has an unvaccinated child under 12 years old who contracts the COVID-19 virus, will be provided sufficient paid-time-off (PTO) by employer independent of any accrued or otherwise available PTO.

### 3. Unvaccinated Employees

- a. Any employee or contractor that is required to and who fails or otherwise refuses to receive the COVID-19 vaccine and/or lies on their vaccination status attestation, consistent with the terms of this Policy, will be terminated.

### 4. Proof of Vaccination

- a. AP reserves the right to require proof of vaccination documentation from its employees and will treat any such record for documentation as confidential for purposes of retaining the same.
- b. Employees and contract staff who, regardless of reasoning or exemption, **do not meet the status of fully vaccinated** consistent with the terms of this Policy must, in consideration of all rules, regulations and employer policies and procedures:
  - i. May not work any in-person events.
  - ii. Will be offered alternative work options, if necessary and if available.
  - iii. If vaccination status changes, employee may provide POV and will be considered for reemployment.

### 5. Masking, Social Distancing and Other Requirements

- a. Employees and contract staff who **meet vaccination terms** of this Policy must still adhere to stated following requirements for masking, social distancing and self- screening.
  - i. Abide by masking requirements for vaccinated staff. This includes the following:
    1. Surgical mask wearing for all programs, except COVID-19 testing events. N95 masks are required for all staff during COVID-19 testing events.
      - a. Fully vaccinated staff may remove N95 mask fully during break time.
    2. Wearing surgical mask at all times over mouth and nose while on duty for all wellness and vaccination events.
      - a. May remove surgical mask for breaks only
    3. Ensuring 6-foot distancing between all persons.
    4. Monitoring and reporting daily health symptoms [i.e. fever, cough, shortness of breath, etc.]
  - ii. Any vaccinated employee found to be in violation of the masking, social distancing or self-monitoring requirements will be subject to AP's established progressive corrective action plan.

### 6. Current Employees

- a. All current employees and contractors are encouraged to receive the COVID-19 vaccination immediately and if they work in an office, or in a location where other employees or patients are, must have received at least one vaccine dose no later than September 20<sup>th</sup>, unless otherwise exempt from this Policy by an approved accommodation pursuant to the interactive process.

**7. Vaccination Status Communication**

- a. Vaccine status communication must be submitted and processed prior to accepting or working community events.
- b. Proof of fully vaccinated is required before accepting work assignments.

**8. Accommodations or Exemptions**

- a. In accordance with all federal, state and local rules and regulations, AP recognizes that there may be certain circumstances barring an employee from receiving the COVID-19 vaccine consistent with this Policy.
- b. Employees or contract staff in need of an exemption from this Policy due to a medical reason or in consideration of a sincerely held religious belief, must submit a completed ***Request for Accommodation*** form to Human Resources (HR) Director to begin the interactive accommodation process.
- c. Accommodations may be granted where they are required by law and do not cause Employer undue hardship or pose a direct threat to the health and safety of others, including AP's patients.
- d. All accommodation or exemption requests must be submitted directly by employee to HR.
  - i. All accommodations will be reviewed and processed through Affiliated Physician's HR Department.
- e. NOTE: Employer's receipt of an accommodation request does not automatically excuse an employee from the requirements of this Policy. Rather, consistent with federal and state law, Employer will consider accommodation requests on a case-by-case basis and will engage in further dialogue with an employee, and any physicians, medical providers, and/or church personnel under law, upon receipt of any accommodation form.

**IV. Resources:**

- a. [Can Employers Mandate COVID-19 Vaccines? \(natlawreview.com\)](https://www.natlawreview.com/article/can-employers-mandate-covid-19-vaccines)
- b. [Workplace Vaccination Program | CDC](https://www.cdc.gov/workplace-vaccination/)

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<sup>i</sup> Created Date – 08.24.21

<sup>ii</sup> Last revised – 09.17.21

<sup>iii</sup> Approved Date – 09.08.21