

**Policy Title:** Employee COVID-19 Vaccination Policy

**Responsible Executives:** Vice President for Administration

**Adopted by Authority of:** The President's Cabinet

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**Revision Date, if applicable:** August 25, 2021 (*modified exemption categories*)

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#### **PURPOSE**

Consistent with its duty to provide and maintain a workplace free of recognized hazards, the University has adopted this policy to safeguard the health and well-being of our community, including employees and their families; our students and visitors; others who spend time in our facilities; and those living and working in the area. An effective vaccination program can mitigate conditions that promote COVID-19 infection.

# **SCOPE/APPLICABILITY**

**This policy applies to all employees.** It does not apply to external vendors or visitors to any of our campuses.

Effective dates: July 1, 2021, for all employees who access a U of R campus over the summer months, and no later than August 15, 2021, for all remaining employees.

- "Employee" refers to all full- and part-time faculty, staff, and administrators
  working at all locations. This includes those who are on contracts as well as those
  employed through temporary agencies. It also includes employees who are
  employed on our campus by third party vendors, such as Harvest Table and Barnes
  & Noble.
- Student employees should adhere to the Student COVID Vaccination Policy given "student" is their primary status.

### **POLICY**

It is with these considerations and the general availability of COVID-19 vaccines approved by the U.S. Food and Drug Administration for anyone 12-years of age or older that the University will require the COVID-19 vaccination of all employees and students (12+) learning and/or living on-site. Those who do not receive a vaccine must obtain an approved exemption from the requirement by submitting an <u>Accommodation or Exemption Request Form</u>.

The University is committed to ensuring the health and safety of all students, employees, campus guests, and the greater communities in which our campuses are located. This policy is based on guidance from the Centers for Disease Control and Prevention (CDC), the Equal Employment Opportunity Commission, the California Department of Fair Employment and Housing, American College Health Association, and local public health officials and is designed to comply with all applicable federal, state, and local laws.

In making this decision, we once again turn to our core guiding principles that have consistently anchored our decision-making since the outset of the COVID-19 pandemic: (1) protect the health and safety of our students, employees, families, and guests and (2) offer a rigorous, experiential education for all our students. Requiring vaccines is an important aspect of our return to campus and is critical to reducing the spread of the virus. Vaccinations offer an added measure of safety, especially in congregant office spaces residential communities, and classroom settings.

#### **VACCINATION ADMINISTRATION**

#### **Full Vaccination**

An individual being *fully* vaccinated under this policy is defined as receiving *all* required doses of an FDA (or like non-US entity) authorized SARS-COV-2 (COVID-19) vaccination. You are considered fully vaccinated by the CDC:

- 2 weeks after your second dose in a 2-dose series, such as the Pfizer or Moderna vaccines.
- 2 weeks after a single-dose vaccine, such as Johnson & Johnson's Janssen vaccine.

Employees are responsible for scheduling and obtaining all recommended doses of a COVID-19 vaccine.

Employees may get the vaccine during regularly scheduled work hours contingent on supervisor approval. The University will pay employees for time spent getting the vaccine if during regular work hours. An employee's supervisor must approve their leave to receive a COVID-19 vaccine during working hours to minimize business interruptions.

For information about vaccination locations, visit (see sidebar): <a href="https://www.redlands.edu/urready/getting-tested/">https://www.redlands.edu/urready/getting-tested/</a>

#### **VACCINATION DOCUMENTATION & PROCESS FOR REPORTING**

To establish they have received a vaccination, employees must present written evidence of immunization from the designated site or from an authorized healthcare provider, unless an exemption from this policy has been granted.

#### Vaccination Documentation

**Acceptable** documentation **must show the vaccination brand, date of vaccination(s), and your name**, and includes the following options:

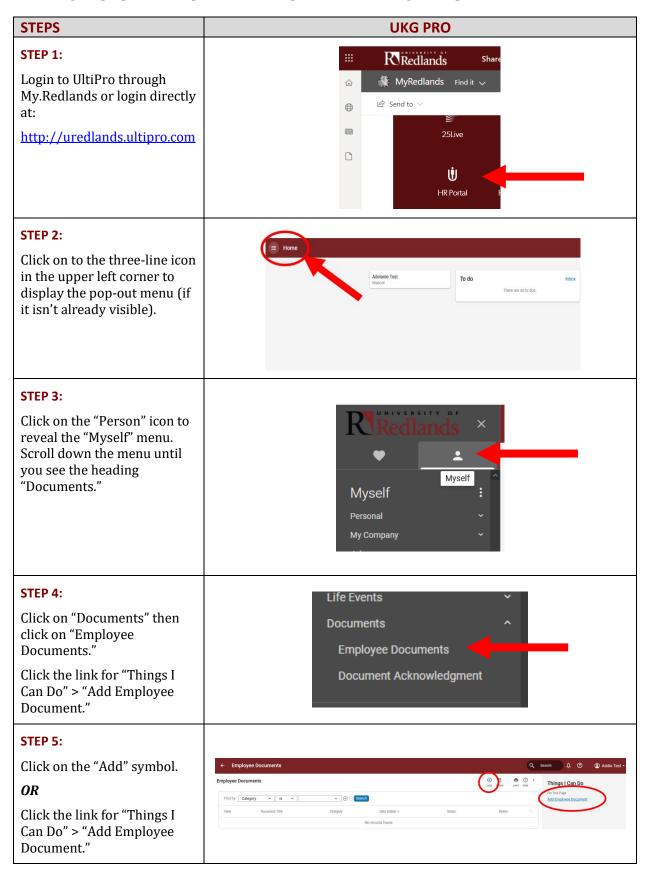
- CDC or similar non-US entity immunization card
- Healthcare provider immunization record

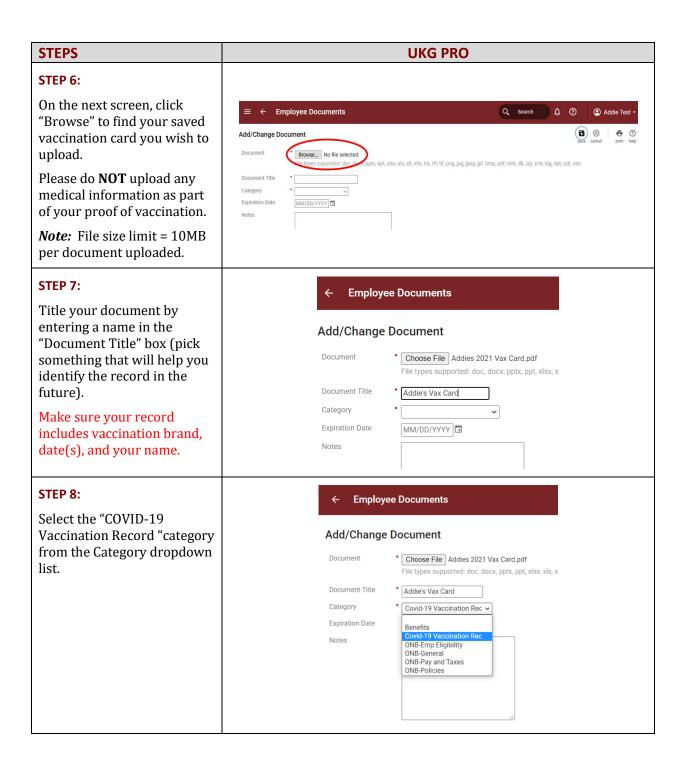
**Not Acceptable** at this time are digital vaccine passports due to lack of a secure international standard.

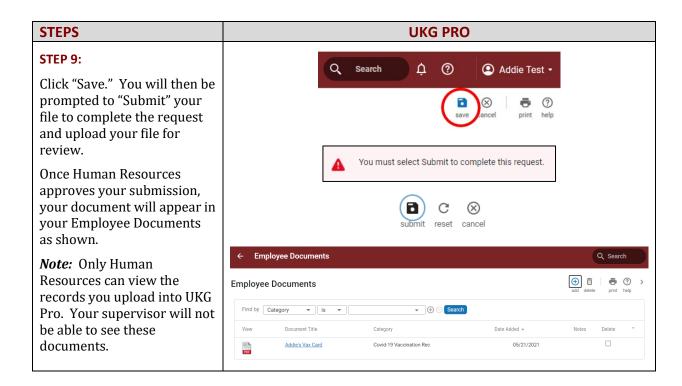
#### Completed Vaccination – Uploading Vaccination Card

Employees need to upload their completed vaccination card (once they are fully vaccinated) via the University's payroll and time management system, UKG Pro(formerly UltiPro). Instructions are included below. Human Resources staff members will verify the information and will only notify an employee if they have any questions. Once uploaded, employees' vaccination cards becomes part of their protected and confidential personnel record accessible only to Human Resources and the employee.

To upload a **COVID-19 Vaccination Card** via UKG Pro, employees must complete the following steps [Do NOT upload an exemption form through UKG]:







# Completed Vaccination – Who Knows My Status?

When an employee uploads a completed vaccination record via the previous steps through UKG, only the employee and Human Resources can access the documents. Supervisors will be able to access within UKG, for their direct reports only, an employee's vaccination status tag as follows: (1) Vaccinated, (2) Exempt, and (3) Temp Exempt. No other information will be accessible. Supervisors need this information so they can ensure proper health and safety protocols are being followed as determined by vaccination status.

# **QUALIFYING EXEMPTIONS & REQUEST FOR EXEMPTIONS**

Employees requesting an accommodation or exemption are required to submit a request using the COVID-19 <u>Accommodation or Exemption Request Form</u>. If you are exempt for any reason, you will be required to do weekly COVID-19 testing, wear face coverings at all times indoors, and maintain physical distancing (this is subject to change as guidance continues to shift).

When submitting an <u>Accommodation or Exemption Form</u> via the online process, employees will be prompted to enter their U of R credentials to access the form. To complete the form:

- 1. Enter personal information (if it did not pre-populate).
- 2. Select one of the four reasons (as listed below).
- 3. Type your name in the signature box to confirm information entered is true and accurate.
- 4. Click the Submit button shown here (located at the bottom of the screen on the left side) to complete the transaction.



### 1 - Disability Accommodation

In accordance with the Americans with Disabilities Act (ADA), the University provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities. If you believe you need an accommodation because of a disability, you are responsible for requesting a reasonable accommodation by submitting an <u>Accommodation or Exemption Request Form</u>. Supporting documentation <u>will</u> be required, reviewed by Human Resources, and treated as personal and confidential.

#### 2 - Medical Reasons

Exemptions are available for medical reasons that make receipt of the vaccine dangerous or otherwise inappropriate. This may also include conditions such history of certain allergic reactions and any other medical condition that is a contraindication to the COVID-19 vaccine even if they do not qualify as a disability under federal, state, or local law. If you believe you need an accommodation regarding this policy for medical reasons, you are responsible for requesting a reasonable accommodation by submitting an <u>Accommodation or Exemption Request Form</u>. Supporting documentation <u>will be</u> required and will be reviewed by Human Resources and will be treated as personal and confidential.

### 3 - Religious Accommodation

The University provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated. If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for submitting an Accommodation or Exemption Request Form.

### **VACCINATION STATUS & RETURNING TO CAMPUSES**

While we are requiring COVID vaccination for all employees, we will have members of our community who cannot or choose not to be vaccinated. **Until further notice, the University will require unvaccinated individuals to take actions intended to mitigate risk whenever they are on-campus**, including weekly COVID-19 testing, completion of daily health check on the Redlands app, physical distancing, and face coverings indoors. Those who are vaccinated no longer need to complete the daily health check on the Redlands app.

For more guidance on what to expect in terms of health and safety requirements when returning to our campuses, please refer to the <u>Interim COVID Policy for All Employees</u> and visit the <u>Employee FAQ</u>.

# **Unvaccinated Employees and Weekly Testing Requirement**

Given we are repopulating our campuses by July 1, 2021, weekly testing results will need to be recorded using the UR Ready app (as is the current process) and **proof of each weekly test must be shared with the employee's supervisor**. Because we have exemptions from the vaccination policy and we must protect the health and safety of our entire community, we are adding this additional step beyond self-reporting via the app. Failure to comply

with the weekly testing requirement while it is in place and/or falsely reporting a test taken will result in disciplinary action up to and including termination.

# **Note on Testing Requirements**

It is reasonable to expect that those who are fully vaccinated will be exempted from weekly COVID-19 testing; however, everyone will still need to follow University health and safety protocols when working, living, and/or studying on a U of R campus.

If there is evidence of substantial or high transmission in the community, or if there are circulating COVID-19 variants that escape the effect of the vaccine, then testing may need to resume for fully vaccinated individuals. Such decisions will be made in conjunction with local public health authorities and/or federal guidance.

# **NON-RETALIATION, PRIVACY, & EQUITY**

The University prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern. Employees have the right to report work-related injuries and illnesses, and the University will not discharge or discriminate or otherwise retaliate against employees for reporting work-related injuries or illnesses or good faith health and safety concerns.

In addition, one's vaccination status is private health information, and the University will handle vaccination records and declination forms with the same care it does for other personal medical information. Requesting (via Human Resources) proof of COVID-19 vaccination, in and of itself, is not a protected inquiry. Nor is asking a colleague if they are vaccinated. Both the Equal Employment Opportunity Commission and California Department of Fair Employment and Housing have indicated that asking whether an employee is vaccinated is permissible as long as the question is limited solely to vaccination status. However, follow-up questions to colleagues such as to why someone did not receive the vaccine may elicit information that is considered protected medical information. Employees do not need to disclose their exemption reason to anyone other than Human Resources.

The University of Redlands is committed to creating and maintaining a community free of all forms of discrimination, harassment, and retaliation. Thus, the University prohibits discrimination and harassment of employees based on their COVID-19 immunization status. Our post-pandemic campuses will be different from our pre-pandemic environments, and we recognize the potential for new forms of discrimination and harassment based on vaccination status.

The University can only act to remedy and prevent specific acts of discrimination, harassment, or retaliation from reoccurring if it is made aware of such conduct. If you believe you are experiencing any of these acts based on your vaccination status, you can contact the <u>Director of Equity and Title IX Coordinator</u> and/or report an incident using the

<u>online form</u>. Behaving in a harassing and/or discriminating manner could result in disciplinary action, up to and including termination.

# **VACCINATION BOOSTER SHOTS**

As medical science continues to evolve and the length of effective immunity for each vaccination option becomes understood, booster shots <u>may</u> become necessary. We will continue to monitor the health science surrounding COVID-19 to modify our health and safety practices as the science emerges.

#### **POLICY MODIFICATION**

Government and public health guidelines and restrictions, as well as best practices within business and industry regarding COVID-19 and COVID-19 vaccines, are changing rapidly as new information becomes available, further research is conducted, and as additional vaccines are approved and distributed. The University reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.