

Mandatory COVID Vaccination Policy

Last Updated: October 26, 2021

Purpose

Vaccination protects our residents, patients, clients, Team Members, and the integrity of the National Church Residences (“the Organization”) workforce. This policy is intended to provide a safe workplace and maximize COVID vaccination among the employees of the Organization. The goal is to protect residents, patients, clients, Team Members, family members, and the community from infection through immunization. This policy is intended to comply with all applicable laws and is based on guidance provided by the Centers for Disease Control and Prevention and public health authorities, as applicable.

Policy

The Organization requires all employees, volunteers, contracted employees (e.g. agency service coordinators, temporary staff and agency staff), and other non-employed individuals working on behalf of the Organization (e.g. instructors who perform clinical rotations onsite) to obtain a COVID vaccination, unless an exemption as a reasonable accommodation is obtained.

Mandatory COVID Vaccination Program: As a condition of employment, continued employment, and in accordance with resident safety standards, all employees, volunteers, and contracted employees are required to be fully vaccinated unless granted an exemption as defined below. This procedure outlines the Mandatory COVID Vaccination program requirements and responsibilities.

- A. All **employees** must maintain immunization records in accordance with organization policies. This includes providing initial proof of immunization, providing booster records, and updating exemption records if applicable. Documentation should be submitted through the confidential email: HRConfidential@nationalchurchresidences.org
- B. Failure to comply with any component of the mandatory vaccination program will result in termination as the employee no longer meets the conditions of employment.
- C. **Volunteers** must provide verification of immunization, booster records, and/or exemption status to the volunteer coordinator prior to beginning volunteer work.
- D. **Companies that supply contract workers** must ensure their immunization and exemption records are up to date and follow Organization policy prior to allowing contract workers onsite.
- E. Failure to comply with any component of the mandatory vaccination program will result in the volunteer or contracted worker being unable to provide any services at or on behalf of the Organization.

Process

I. New Hire/Rehire Candidates:

- A. Recruiters/Hiring Manager will advise New Hire/Rehire Candidates of the policy and assist them with obtaining the exemption forms if requested and following through on the exemption process.
- B. Post offer, New Hires/Rehire Candidates have 3 days to file for an exemption or provide proof of first series of vaccination/full vaccination by submitting required documentation to HRConfidential@nationalchurchresidences.org.
- C. New Hire/Rehire Candidates, requesting an exemption, cannot begin work until the exemption process is approved and communicated by the Exemption Committee.

- D. After providing proof of first vaccination in a series during the hiring process, new hires must provide documentation of full vaccination within 30 days of hire. Failure to do so will result in immediate suspension from work and termination if proof of full vaccination is not received within 3 days of suspension.
 - E. New hires that are not fully vaccinated must follow all protocols and procedures of unvaccinated workers receiving an exemption until fully vaccinated.
- I. **Exemptions:** New Hire/Rehire Candidates requesting an exemption and current employees updating or requesting a new exemption must submit the appropriate request form(s) and provide documentation by the established deadline to HRConfidential@nationalchurchresidences.org. The information provided will be kept confidential. Human Resources will engage in an interactive process to determine if a reasonable accommodation can be provided so long as it does not pose a direct threat to the health or safety of others in the workplace and/or does not create an undue hardship for the Organization.
- A. Medical accommodation
 1. An individual requesting medical exemption because of medical concerns must complete and submit a **Request for Medical Accommodation**.
 2. The individual must also have their physician attest to the medical issue by completing and submitting a **Request for Medical Exemption from Vaccination**.
 3. Each request for a medical accommodation will be evaluated by the Exemption Review Committee utilizing standard criteria for medical exemptions.
 4. The Organization will make a final decision as to whether to grant the medical accommodation upon completion of the processes outlined.
 - B. Religious accommodation
 1. An individual requesting exemption because of sincerely held religious belief or observance including strongly held moral or ethical beliefs as to what is right and wrong which are held with the strength of traditional religious views must complete and submit a **Request for Religious Accommodation**. Social, political or economic philosophies, and mere personal beliefs are not protected by Title VII of the Civil Rights Act, and requests of this nature will not be considered.
 2. The individual may also submit other supporting documentation such as excerpts from doctrine, pamphlets, text or other materials that support the religious tenet which prohibits vaccination.
 3. Each request for religious accommodation will be evaluated by the Exemption Review Committee.
 4. The Organization will make a final decision as to whether to grant the religious accommodation upon completion of the processes outlined.
 5. Individuals who are granted a religious accommodation must reapply for exemption annually.
 - C. State or local legislation exemption:
 1. An individual requesting an exemption because of state or local legislation affecting their designated worksite must complete and submit a **Request for State or Local Legislation Exemption**.
 2. Each request for exemption will be evaluated by the Exemption Review Committee.
 3. The Organization will make a final decision as to whether to grant the state or local legislation exemption upon completion of the processes outlined.
 4. Should legislation be overturned, exemptions will expire and employee will be required to comply.
 - D. Notification following review by Exemption Review Committee:
 1. Human Resources will communicate final exemption decision to the requesting individual as well as the hiring manager/direct supervisor. Confidential details regarding the exemption request will not be included in the communication to the hiring manager/direct supervisor.
 2. If approved, the direct supervisor will ensure the employee complies with unvaccinated requirements.
 3. Failure to comply with any component of the mandatory vaccination program will result in a no hire status/termination as the individual no longer meets the conditions of employment.
 - E. Requirements upon receiving approval for exemption:

1. Mask/PPE: Unvaccinated employees are required to wear a mask/PPE at all times while in any Organization property or worksite and any time working and within close proximity to others, including co-workers, residents, clients, and visitors. The type of mask/PPE required is determined by the Organization based on CDC guidance and/or state requirements/recommendations.
2. Social distancing: Unvaccinated employees will follow current protocols for social distancing by increasing the space between people and reducing the number of times people come into close contact with each other.
3. Self-Screen:
 - a. Unvaccinated employees are required to perform a daily self-screen upon entering an Organization property or worksite.
 - b. If an employee fails the daily self-screen, the employee cannot work and must present a negative COVID test before returning work.
4. Testing: Unvaccinated employees may be required by the employee's worksite to be regularly tested for COVID based upon regulations as defined by CMS, ODH, or ACHA, or other governing body.
5. Quarantine after traveling: Unvaccinated employees are required to follow current quarantine recommendations provided by the Organization when returning from travel. An unvaccinated employee may use PTO or unpaid leave during any required quarantine.

II. Returning from Leave of Absence

- A. Following implementation of this policy, upon returning from a Leave of Absence, employees must ensure vaccination/exemption status is current. Employees returning from a Leave of Absence that are not fully vaccinated must follow all protocols and procedures of unvaccinated workers receiving an exemption until fully vaccinated.

Tools and Resources

Definitions:

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- Team Members: employees, managers, board members, associated providers, volunteers, independent contractors and their employees, vendors, and employees of contracted services
 - Full Vaccination/Fully Vaccinated: Employee has received the recommended number of doses of the COVID-19 vaccine in the recommended time frame as outlined by the CDC and followed up with subsequent booster vaccinations if required and as communicated by the Organization.
 - Organization property or worksite: all residential facilities, housing facilities, corporate office and other freestanding office settings, remote/distributed work environments, as well as any location where we do business or provide services
 - Proof of full vaccination: Documentation indicating the recommended doses of the vaccine was received which includes, date of administration, manufacturer, lot number, and individual or location administering.
 - Exemption: As pertains to this policy, exemption is to be released of the requirement to receive the vaccination.
 - Exemption Review Committees: Medical accommodation requests will be reviewed by Clinical Leadership and HR. Religious accommodation requests will be reviewed by Legal and HR.
 - Appeal Process: If initial request for exemption is denied, employee may choose to escalate the request by submitting additional statement(s) and/or additional documentation to support the request.

Applicable Forms:

- Request for Medical Accommodation – Employee Form – COVID
- Request for Medical Exemption from Vaccine – Physician – COVID
- Request for Religious Accommodation (including Moral/Ethical Belief Exception) – COVID
- Request for State or Local Legislation Exemption – COVID

Revision History

Issuer: Chief Human Resources Officer				Effective Date: November 1, 2021	
Policy Number: 400-12		Version: 1		Supersedes: n/a	
Date	Reviewed/Revised by:	New Changes	No Change	Revision(s): State reason for revision	Initials
8/9/2021	Human Resources	X		Started with template provided by outside counsel (Squire Patton Boggs)	LO/MN
8/19/2021	Human Resources	X		Combined policy with form templates	LO/MN
9/10/2021	Human Resources	X		Fully vaccinated date changed	MN/CE
10/26/2021	Human Resources	X		Policy formatted to move forward, Dates removed so policy is universal	LO/MN