

SUBJECT: COVID-19 Vaccination Policy

APPROVED BY:
Executive Director

Effective Date/Revised: Sept. 2021

Consistent with its duty to provide and maintain a workplace that is free of recognized hazards, and to safeguard the health and well-being of its employees, clients, and students United Community Services has adopted this COVID-19 Vaccination Policy, to be implemented as a condition of employment. This Policy will also serve to protect employees' families, our consumers family members, vendors, contractors, visitors, others who spend time in our facilities, and the community from the risks associated with COVID-19. This Policy is intended to comply with applicable state and local laws. It is based upon guidance provided by the Occupational Safety and Health Administration (OSHA), the U.S. Equal Employment Opportunity Commission (EEOC), the Vermont Attorney General's Office, the Centers for Disease Control and Prevention (CDC), Vermont Department of Health (VDOH), Agency of Education, and other public health and licensing authorities, as applicable. This Policy may be unilaterally amended or retracted by UCS consistent with UCS Personnel Policies and Procedures Section I Division B. The scope of this Policy applies to all employees, volunteers and interns.

Clarification/Procedure:

1. By November 1, 2021, the Agency will require all employees to either (a) establish that they have received the complete SARS-CoV-2 vaccine series ("COVID-19 vaccine"); or (b) obtain an approved exemption as an accommodation in keeping with this Policy and the UCS Policy on Reasonable Accommodation (Section II Division B). For purposes of this Policy, an employee has fulfilled the vaccine requirement after receiving the second dose of a two-dose vaccine (Pfizer or Moderna) or one dose of a single-dose vaccination (Johnson & Johnson/Janssen).
 - a. Employees who do not fulfill one of these two requirements will be placed on unpaid leave until their employment status is determined by the UCS Executive Director or Director of Human Resources.
 - b. To establish that they are fully vaccinated, employees must photocopy or scan and provide a completed COVID-19 Vaccination Record Card or other appropriate confirming documentation to the Human Resources Department. The Agency will treat all such information and documentation as confidential.
 - c. Should the COVID-19 vaccination become a series to include booster(s), employees must remain fully vaccinated in accordance with those updates.
 - d. New employees hired after implementation of this Policy shall present evidence of first vaccination within two weeks of hire and evidence of full vaccination 4 weeks thereafter, unless the employee receives the Johnson & Johnson/Janssen vaccination and fulfills this requirement with the one dose vaccine within two weeks of employment.
 - i. Upon conditional offer of employment, an inquiry about the successful applicant's vaccination status will be sought, and any such successful applicant who is not fully vaccinated will be given a copy of this policy for their understanding and follow-up.
 - ii. The agency highly encourages conditionally offered applicants to begin this process as soon as possible. New employees must request any accommodation as an exemption to this Policy no later than one week after the date of hire. Any paid leave benefit provided through with policy, below, begins only upon actual job start.
2. To facilitate employees' ability to receive the vaccination, the Agency will consider timely requests for appropriate time off.,
 - a. Use of regularly scheduled work time for this purpose should be requested and arranged when possible, including the travel to and from receiving the vaccine, for both exempt and non-exempt employees.
 - b. The Agency will also provide pay for up to two hours to its non-exempt employees for the time entailed in receiving each vaccination dose if it is outside of the employee's regularly scheduled work hours and weekly limits.
 - c. Any time outside of the employee's regular work hours spent receiving the vaccine, including travel to and from the clinic location, in excess of the two hours can be compensated using accrued, unused leave

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time.

- d. Additionally, if an employee has exhausted their accrued Sick Leave or is not Benefit Eligible, the Agency will provide reasonable paid time off, not to exceed 8 (eight) hours if the employee is unable to report to work as a result of symptoms resulting from the COVID 19 vaccine. Any additional time required for this purpose can be compensated using additional accrued Leave if available.
3. Effective with this Policy, the Agency will reimburse employees, and conditionally job offered applicants, for the cost, if any, of receiving the vaccination, contingent upon receipt of appropriate supporting documentation, and only if free vaccination options are no longer available, as verified by the UCS Medical Director.
4. All Agency visitors, vaccinated or unvaccinated, will be required to follow Agency instructions up to and including masking protocols, use of social distancing, Personal Protective Equipment (PPE) and other infection control strategies, as directed by the Agency. Such protocols shall be communicated in a suitable manner at the discretion of the agency with or without formal change to this policy. Any applicable regulatory requirements about mask wearing for healthcare shall be followed.
5. This policy applies specifically to COVID-19 vaccines that are available to the public, which includes our employees. The Vermont Department of Health website will provide employees with the most recent information on COVID-19 vaccines and clinics which, at the time of the initial approval of this Policy is www.healthvermont.gov/covid-19/vaccine/getting-covid-19-vaccine.
6. Individuals who may be eligible for an accommodation in accordance with applicable laws may request an exemption from this policy. (See also the Agency's policy on Reasonable Accommodation Section II, Division B) Requests for exemptions as an Accommodation are as follows: (See also the Agency's policy on Reasonable Accommodation Section II, Division B)
 - a. To assist any employee who is a person with a disability, who has a pregnancy-related condition, who has a qualifying medical condition that contraindicates the vaccination, or who objects to being vaccinated on the basis of sincerely held religious beliefs and practices, the Agency will engage in an interactive process to determine if a reasonable accommodation can be provided so long as it does not create an undue hardship for the Agency and/or does not pose a direct threat to the health or safety of others in the workplace and/or to the employee. These limits will be assessed consistent with applicable legal requirements.
 - b. To request an accommodation for one of the above reasons, please contact the Director of Human Resources in writing by email, briefly stating the category of reason, as noted above, for the accommodation request. Those employed by the Agency as of September 15th, 2021, must submit this initial notice by October 1, 2021 for an accommodation as an exemption from the COVID vaccine requirements set out in Policy.
 - c. Once the Agency is aware of the need for an accommodation, the Agency will engage in an interactive process with the employee to identify possible accommodations, beginning with the employee's timely completion of the Agency's accommodation form(s) that will be provided to the employee upon receiving notice of request for accommodation. The interactive dialogue will begin shortly upon receipt and within a reasonable timeline for scheduling purposes.
 - d. This may require the employee's consent to obtain or receive medical documentation or additional information about a particular religion and its tenets if either is determined to be necessary to support the Agency's consideration of the request for accommodation.
 - e. Employees who are granted an exemption from the vaccination requirement must comply with any applicable accommodation requirement(s) as determined necessary by the Director of Human Resources and the Medical Director, in conjunction with the COVID Core Team. Such requirements may include but are not limited to use of additional personal protective equipment (PPE), testing requirements, and other limitations and modifications that may be applicable. Employees are required to comply with such requirements, which are sometimes referred to as the "alternative procedures to mitigate risk of

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transmission of vaccine preventable diseases.” Failure to comply with such requirements and mitigation procedures may result in disciplinary or remedial action, up to and including termination, as described further in Section VII of the UCS Personnel Policies and Procedures.

7. If any employee believes that they have been treated in a manner not in accordance with this policy, please notify the Agency by speaking with the Director of Human Resources or, if unsatisfied, or if there is a conflict of interest, please follow the chain of command by contacting the Executive Director.
8. As consistent with Agency’s policy on reasonable accommodation, UCS shall not discriminate or retaliate to a good faith request for accommodation.