

COVID-19 Vaccination, Testing and Face Covering Policy

St. Thomas University Vaccination, Testing, and Face Covering Policy

Purpose:

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation. St. Thomas University encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees. Should an employee choose not to be vaccinated, this policy's sections on testing and face coverings will apply. This policy complies with OSHA's Emergency Temporary Standard on Vaccination and Testing and requires those employees not fully vaccinated to wear a face covering starting Monday, January 10, 2022, and requires those employees not fully vaccinated to comply with testing requirements by Wednesday, February 9, 2022.

Scope:

This COVID-19 Policy on vaccination, testing, and face covering use applies to all employees of St. Thomas University, except for employees who do not report to a workplace where other individuals (such as coworkers or visitors) are present; employees while working from home; and employees who work exclusively outdoors.

Employees are considered fully vaccinated two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as Johnson & Johnson's vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series. Employees who are not fully vaccinated will be required to provide proof of weekly COVID-19 testing and wear a face covering at the workplace.

All employees will be asked as to their vaccination status and, if vaccinated, to provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their testing results. If an employee's vaccination status has previously been submitted to STU, a new vaccination card is not required to be submitted unless a change has occurred, such as obtaining a booster shot. If employees do not comply, disciplinary action may be taken up to and including termination. Employees who do not provide proof of vaccination will be presumed to be not fully vaccinated.

Procedures:

Overview and General Information

Vaccination, Testing and Face Covering

All employees who are not fully vaccinated as of Monday, January 10, 2022, will be required to wear a face covering when in the workplace. All employees who are not fully vaccinated as of Wednesday, February 9, 2022, will be required to undergo regular COVID-19 testing, as outlined below.

Vaccination Status and Acceptable Forms of Proof of Vaccination

Vaccinated Employees

All vaccinated employees will be asked to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status should be submitted to Matthew Roche, AVP of Student Affairs and Compliance, through the JotForm link.

Acceptable proof of vaccination status is:

1. The record of immunization from a health care provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination;
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).

Proof of vaccination generally should include the employee's name, date of birth, the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) that administered the vaccine.

If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so (e.g., by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated); attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof; and including the following language:

"I declare that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to disciplinary actions and/or criminal penalties."

An employee who attests to their vaccination status in this way should to the best of their recollection, include in their attestation the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine. Intentionally providing false or inaccurate vaccination information may result in disciplinary action. All attestations should also be sent through the Jotform link as an attachment.

All Employees

All employees, both vaccinated and unvaccinated, will be asked to document their vaccination status.

All documentation related to vaccination status must be submitted by Friday, January 7, 2022.

- **Vaccinated individuals should submit proof of vaccination, including the dates of vaccination and type of vaccine received.**
- **Unvaccinated individuals should submit an email to mattroche@stu.edu stating that you are unvaccinated.**

Supporting COVID-19 Vaccination

An unvaccinated or partially vaccinated employee may take up to four (4) hours of duty time per dose to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight (8) 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 (4) hours to get the vaccine must send their supervisor an email documenting the reason for the additional time (e.g., they may need to travel long distances to get the vaccine). Any additional time requested will be granted, if reasonable, but will not be paid; in that situation, the employee can elect to use accrued leave, e.g., sick leave, to cover the additional time. If an employee is vaccinated outside of their approved duty time, they will not be compensated.

Employee Notification of COVID-19 and Removal from the Workplace

St. Thomas University will require employees to promptly notify Matthew Roche, Associate Vice President of Student Affairs, through the contact tracing form, when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

St. Thomas University will immediately remove an employee from the workplace upon notification of a positive COVID-19 test.

Return to Work Criteria

For any employee removed because they are COVID-19 positive, St. Thomas University will keep them removed from the workplace until the employee meets the return-to-work criteria in CDC's "Isolation Guidance".

Under CDC's "[Isolation Guidance](#)," employees may return to work after five days and no symptoms or for symptomatic individuals, if their symptoms are resolving. Masks must be worn for an additional five days after a positive test. If a fever persists, individuals should continue to stay home until 24 hours without a fever and not using fever reducing medication.

If an employee has severe COVID-19 or an immune disease, St. Thomas University will follow the guidance of a licensed healthcare provider regarding return to work.

COVID-19 Testing:

All employees who have not provided documentation that they are fully vaccinated will be required to comply with weekly testing. Covid testing will be offered on campus throughout the semester. As soon as details of testing location and times are finalized, they will be shared with the STU community.

Face Coverings:

Starting January 10th, St. Thomas University will require all employees who are not fully vaccinated to wear a face covering. Employees who are not fully vaccinated must wear face coverings over the nose and mouth when indoors. Policies and procedures for face coverings will be implemented, along with the other provisions required by OSHA's COVID-19 Vaccination and Testing ETS, as part of a multi-layered infection control approach for unvaccinated workers.

The following are exceptions to St. Thomas University requirements for face coverings:

1. When an employee is alone in a room with floor to ceiling walls and a closed door.
2. For a limited time, while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.
3. When an employee is wearing a respirator or facemask.

New Hires:

All new employees are required to comply with the vaccination, testing, and face covering requirements outlined in this policy as soon as practicable 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.

Confidentiality and Privacy:

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

Additional Policy Statements:

St. Thomas University will not discriminate or retaliate against any employee who reports a work-related injury/illness or as a result of actions that an employee takes that are required under this policy.

St. Thomas University will provide to each employee a copy of or a link to the Centers for Disease Control’s document entitled “Key Things to Know About COVID-19 Vaccines.”

Questions:

Please direct any questions regarding this policy to Matthew Roche, AVP of Student Affairs and Compliance.

This policy was adopted and promulgated on _____.