

# COVID-19 Vaccination, Testing and Face Covering Policy

## Highland Community College Vaccination, Testing, and Face Covering Policy Temporary 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 as a whole. Highland encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees, students and community members. However, should an employee not be vaccinated, this policy's sections on testing and face coverings will apply. This policy complies with the Illinois Department of Labor's adoption of the OSHA's Emergency Temporary Standard (ETS) on Vaccination and Testing (29 CFR 1910.501).*

### **Scope:**

*This COVID-19 Policy on vaccination, testing, and face covering use applies to all employees of Highland except for employees who do not report to a workplace where other individuals (such as coworkers or students) are present; employees while working from home; and employees who work exclusively outdoors. All sections of this policy are subject to change as directed by the Illinois Department of Public Health, State of Illinois, Centers for Disease Control or other authority.*

*All employees are encouraged to be fully vaccinated. At present, 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.*

*All employees are required to report their vaccination status and, if vaccinated, 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. Employees not in compliance with this policy will be subject to discipline.*

*Employees may request an exception from vaccination requirements (if applicable) if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by contacting Human Resources. The exemption request form can be found on the Staff Portal, Human Resources, <https://highland.edu/human-resources/>. All such requests will be handled in accordance with applicable laws and regulations and Highland policies.*

## **Procedures:**

### **Overview and General Information**

#### **Vaccination**

*Any required Highland employee not fully vaccinated will be subject to the regular testing.*

*As an example, at present to be fully vaccinated an employee must:*

- Obtain the first dose of a two dose vaccine; and the second dose, or*
- Obtain one dose of a single dose vaccine.*

*Employees will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine as stated above. An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.*

*The conditions to be considered as fully vaccinated may change. Highland follows Illinois Department of Public Health (IDPH) and Center for Disease Control (CDC) for guidance. Employees are encouraged to contact Human Resources or monitor the Human Resources Portal for updated information.*

#### **Testing**

*All employees who are not fully vaccinated will be required to undergo regular COVID-19 testing. Policies and procedures for testing are described in the relevant sections of this policy.*

### **Vaccination Status and Acceptable Forms of Proof of Vaccination**

#### **Vaccinated Employees**

*All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status should be submitted to Human Resources. Vaccination records are considered confidential and will be maintained separate from the Human Resources file.*

*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, 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. In some cases, state immunization records may not include one or more of*

*these data fields, such as clinic site; in those circumstances Highland will still accept the state immunization record as acceptable proof of vaccination.*

*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 (or certify, verify, or state) 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 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.*

### **All Employees**

*All employees, both vaccinated and unvaccinated, must inform Highland of their vaccination status.*

### **Supporting COVID-19 Vaccination**

*An employee may take up to four hours of work time per dose to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight hours of work time for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of work time will be granted. Employees who take longer than four 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 work time they will not be compensated.*

*Employees may utilize their sick leave up to two workdays immediately following each dose if they have side effects from the COVID-19 vaccination that prevent them from working. Employees who have no sick leave will be granted up to two days of additional sick leave immediately following each dose if necessary.*

### **Employee Notification of COVID-19 and Removal from the Workplace**

*Highland will require employees to promptly notify their supervisor and Human Resources when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.*

### **Medical Removal from the Workplace**

*Highland has also implemented a policy for keeping COVID-19 positive employees from the workplace in certain circumstances. Highland will immediately remove an employee from the workplace if they have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider.*

## Return to Work Criteria

*For any employee removed because they are COVID-19 positive, Highland will exclude the employee from the workplace until the employee receives a negative result on a COVID-19 nucleic acid amplification test (NAAT) following a positive result on a COVID-19 antigen test if the employee chooses to seek a NAAT test for confirmatory testing; meets the return to work criteria directed by the Illinois Department of Public Health, CDC's "Isolation Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.*

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

## **COVID-19 Testing**

*All employees who are not fully vaccinated will be required to comply with this policy for testing. Contact Human Resources for instructions on how to sign up for SHIELD on-site testing.*

*Employees who report to the workplace at least once every seven days:*

*(A) must be tested for COVID-19 at least once every seven days; and*

*(B) must provide documentation of the most recent COVID-19 test result to Human Resources no later than Friday each week.*

*Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were teleworking for two weeks prior to reporting to the workplace):*

*(A) must be tested for COVID-19 within seven days prior to returning to the workplace; and*

*(B) must provide documentation of that test result to Human Resources upon return to the workplace.*

*If an employee does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace until they provide a test result.*

*Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis.*

## **Face Coverings**

*Highland will require all employees to wear a face covering. At present, face coverings must: (i) completely cover the nose and mouth; (ii) be made with two or more layers of a breathable fabric that is tightly woven (i.e., fabrics that do not let light pass through when held up to a light source); (iii) be secured to the head with ties, ear loops, or elastic bands that go behind the head.*

*Employees must wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for face coverings will be implemented as part of a multi-layered infection control approach for unvaccinated workers.*

*The following are exceptions to Highland's 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.*
4. *Where Highland has determined that the use of face coverings is infeasible or creates a greater hazard (e.g., when it is important to see the employee's mouth for reasons related to their job duties, when the work requires the use of the employee's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).*

**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.*

**Questions:**

*Please direct any questions regarding this policy to Human Resources.*

Effective: January 24, 2022

Anticipated Temporary End Dated: May 2022