

<b>Policy Name</b>	COVID-19 Vaccinations
<b>Chapter</b>	Personnel
<b>Tracking Number</b>	2.65
<b>Administered By (Policy Owner)</b>	Chief Human Resources Officer
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<b>Revision Date</b>	
<b>Signature</b>	, President & CEO

<b>POLICY</b>	<p>Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation. Aspire Health Alliance has adopted this policy on mandatory vaccination to safeguard the health of our employees from the hazard of COVID-19.</p> <p>This step reflects our highest priority, which is to protect the health and safety of the people in our care, our employees, and the broader community in which we work and live. Vaccination also helps to reduce workplace absenteeism due to COVID-19 illness and helps to provide continuity of services for our clients.</p> <p><b>This policy complies with OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).</b></p>
<b>SCOPE</b>	<p>This Mandatory COVID-19 Vaccination Policy applies to all employees of Aspire Health Alliance as follows: all employed colleagues, all contract staff and all interns working onsite or remotely, clinical or non-clinical, full-time or relief.</p> <p>As a condition of employment individuals performing clinical or administrative functions, Doctoral Interns, Interns, all workforce members within Aspire Health Alliance are required to be fully vaccinated against COVID-19 unless they have an approved exemption.</p> <p><b>Full vaccination is defined as:</b></p> <ul style="list-style-type: none"> <li>i. Two (2) doses in a 2-dose vaccine series, such as the Pfizer or Moderna vaccines; or</li> <li>ii. One (1) dose in a single-dose vaccine, such as Johnson &amp; Johnson’s Janssen vaccine.</li> </ul>
<b>PROCEDURES</b>	<p><b>1. Vaccination Status and Documentation:</b></p> <p>All employees who do not have an approved exemption must submit documentation sufficient to demonstrate that they are fully vaccinated by January 31, 2022.</p> <p>Aspire Health Alliance shall require and maintain for each individual proof of current vaccination against COVID-19 or the individual’s approved exemption form in a confidential employee health folder.</p> <p>Employees are strongly encouraged to receive their vaccine. COVID-19 vaccines are widely available, and Aspire Health Alliance will pay you for the time taken during work time to get vaccinated. You can also go to your local CVS or Walgreens pharmacy to get vaccinated. If you are not yet vaccinated, you should explore these options as</p>

soon as possible.

Employees must email supporting documentation of receiving a single-dose vaccine (J&J) or the second dose in a 2-dose vaccine series by January 31, 2022, as applicable to [dfang@aspirehealthalliance.org](mailto:dfang@aspirehealthalliance.org).

Individual proof of current vaccination may include but is not limited to:

- Copy of CDC Vaccination Card front and back;
- Copy of MA Immunization Information System (MIIS) Vaccination Record (found on-line); or
- Copy of vaccination from their electronic health record. (which can be asked for from Primary Care Provider (PCP) Office)

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination.

### **New Hires**

In accordance with the approach noted above, the same documentation deadline applies to all prospective and/or onboarding new hires, contract staff, and Interns. Additionally, effective **January 31, 2022**, all prospective and/or onboarding new employees, contract staff and Interns must receive the COVID-19 vaccination in full prior to their date of hire as a condition of new employment or internship assignment, unless otherwise exempted by an approved accommodation. Supporting documentation must be submitted prior to effective start date.

### **2. Exemptions – Medical or Religious:**

If an employee wishes to request an exemption to this vaccine mandate based on a qualifying medical condition or sincerely held religious belief, the employee should use the **COVID-19 Exemption Request Form** for Medical or Religious Exemption found on Aspire's Intranet. To access the forms, go to the Intranet, look for Forms, then go to Human Resources Forms section, click to find the form listed. The form must be completed, signed by the employee and then submitted to HR Benefits [dfang@aspirehealthalliance.org](mailto:dfang@aspirehealthalliance.org) as soon as possible, and no later than January 7, 2022, so Aspire can evaluate whether a reasonable accommodation can be provided that does not create an undue hardship for Aspire and/or does not pose a direct threat to the health or safety of others in the workplace or employees. Accommodation requests received after January 14, 2022, will be timely processed by Aspire, but may result in the employee being placed on unpaid leave effective February 1, 2022, pending a determination on the reasonable accommodation request.

A request for Medical Exemption must be accompanied by a note from the employee's PCP as noted in the instructions on the Exemption Request Form. Upon receipt of a request for a religious or disability accommodation, Aspire will engage in the interactive process to determine the precise limitations of the employee's ability to comply with the mandatory vaccination policy and explore potential alternatives to address these limitations. While Aspire will consider an employee's suggested accommodation, it is not required to agree to any specific accommodation requested and may provide an alternative accommodation, to the extent any reasonable accommodation can be made consistent with this policy and applicable law. Employees are expected to engage in the interactive process and provide required documentation, consistent with applicable law, to assist Aspire in evaluating their request and determining what, if any, accommodations can be made.

Information regarding any accommodations made or granted will be shared on a need-to-know basis only with personnel necessary to implement the reasonable accommodation and without disclosing the basis for the accommodation were unnecessary.

**3. Vaccine Leave:**

To facilitate compliance with this policy, Aspire is providing all employees with 4 hours of emergency paid leave per vaccine dose to compensate employees for the time that it takes to be vaccinated, this includes travel to the vaccination site, receive the vaccination and return to work.

If an employee is vaccinated outside of their approved work schedule time they will not be compensated.

To request time during your work scheduled to receive the vaccine, the employee must complete a **Request for Vaccination Appointment Form** found on Aspire's Intranet. To access the form, go to the intranet, look for Forms, then go to Human Resources Forms section, click to find the form listed. The form must be completed, signed by the employee, and then submitted to their supervisor for approval before scheduling an appointment to receive the vaccine. The supervisor may need to ensure there is coverage, if necessary, to allow the employee to leave work to receive the vaccination.

**4. Communication:**

Aspire Health Alliance will provide all employees with information about the risks and benefits of COVID-19 vaccination

**5. Management of COVID-19 Cases:**

Employees will continue to follow established DPH and CDC directives and guidance of COVID-19 cases and exposures. These guidelines can be found on the first page of the Intranet under Coronavirus Resources.

**Masking**

If an employee covered by this policy is not fully vaccinated (e.g., if they are granted an exception from the mandatory vaccination requirement because the vaccine is contraindicated for them), Aspire Health Alliance will require the employee to wear a **surgical mask**.

Employees who are not fully vaccinated must wear surgical face masks 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, 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.

Employees will obtain surgical face masks from their manager which are purchased by Aspire Health Alliance.

The following are exceptions to organization's requirements for surgical face masks:

- a. When an employee is alone in a room with floor to ceiling walls and a closed door.
- b. 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.
- c. When an employee is wearing a N95 or KN 95 mask.

**6. 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.

**Resources**

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/safety.html> [cdc.gov];  
<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/How-Do-I-Get-a-COVID-19-Vaccine.html>. [cdc.gov]

**Aspire may revise and update this policy as additional guidance is issued by the Task Force, federal government agencies, the CDC, and/or other government or public health authorities, including any future guidance relating to vaccine booster shots.**

**Questions**

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

This model plan is intended to provide information about OSHA’s COVID-19 Emergency Temporary Standard. The Occupational Safety and Health Act requires employers to comply with safety and health standards promulgated by OSHA or by a state with an OSHA-approved state plan. However, this model plan is not itself a standard or regulation, and it creates no new legal obligations.