



<b>POLICY TITLE:</b>	Employee COVID-19 Vaccination Policy
<b>POLICY NUMBER:</b>	10.34
<b>VERSION:</b>	1.0
<b>REVISED DATE:</b>	August 2, 2021
<b>REVIEWED DATE:</b>	August 6 and September 1, 2021
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<b>NUMBER OF PAGES:</b>	5

## A. OVERVIEW

- 1. Description and Purpose** - In accordance with City of Saint Paul (City) 's duty to provide and maintain a workplace that is free of known hazards, we are adopting this policy to safeguard the health of our employees and their families; our customers and visitors; and the community at large from infectious diseases, such as COVID-19, which may be diminished through an effective vaccination program. This policy will comply with all applicable laws and is based on guidance from the Centers for Disease Control and Prevention and Alaska Department of Health and Social Services, as applicable.
- 2. Applicability** – This policy applies to all to all City employees.
- 3. Failure to Comply** – Failure to comply with this policy may result in disciplinary action in accordance with this Policy and any and all disciplinary policies of the City.

## B. POLICY AND PROCEDURE

### 1. Continued Applicability of Other Infection Control Policies

- This Policy is a key part of our overall strategy and commitment to maintaining a safe and healthy workplace considering the COVID-19 pandemic. This policy is designed for use together with, and not as a substitute for, other COVID-19 prevention measures of the City.
- The City needs employees' full cooperation and compliance with this and other health and safety workplace policies to make them effective.

### 2. Vaccination Requirement

- Consistent with the CDC's guidance and other applicable public health guidance of the State of Alaska, to prevent the infection and spread of COVID-19, and as an integral part of its public health and safety measures, All employees must be fully vaccinated against COVID-19 by November 30, 2021 and provide proof of an FDA-approved or authorized COVID-19 vaccination, unless an exemption from this policy has been granted as a reasonable accommodation.
- All employees will be paid for time taken off from work to receive vaccinations to comply with this Policy.

- c. Before the stated deadline to be vaccinated have expired, employees will be required to provide either proof of vaccination or an approved reasonable accommodation to be exempted from the requirements.

**d. Failure to Comply with Requirement**

- i. Employees will be given until November 30, 2021 to comply with the requirements.
- ii. Employees who fail to comply with these requirements prior to the stated deadline to be vaccinated will be terminated.

**3. Vaccine Administration**

- a. Employees are responsible for scheduling and obtaining all recommended doses of an FDA-authorized COVID-19 vaccine.
- b. Employees may get the vaccine during regular scheduled work hours if feasible and be paid for the time taken off to receive the vaccine.
- c. Employees will be paid for one (1) day taken off from work to recover from receiving a vaccination.

**4. Proof of Vaccination**

- a. Before the stated deadlines to be vaccinated have expired, employees will be required to provide either proof of vaccination in the form of a CDC-issued vaccination card to the City Clerk. Do not include any medical or genetic information with your proof of vaccination.
- b. If an employee has already received a vaccine from a health care provider, the employee must provide written proof of vaccination in the form of a CDC-issued vaccination card to the City Clerk. Do not include any medical or genetic information with your proof of vaccination.

**5. Requests for Reasonable Accommodations from Immunization/Vaccination Requirements**

- a. All objections must be made:
  - iii. Within thirty (30) days of the issuance of this policy for current employees.
  - iv. Prior to being hired for all new hire employees.
    - 1) Requests for reasonable accommodation for new hire employees must be reviewed for consideration prior to the new employee starting.
    - 2) The review of a request for reasonable accommodation may delay the new employee from beginning their employment.
- b. Each request for a reasonable accommodation from an immunization/vaccination requirement will be reviewed to determine if the employee's unvaccinated status would pose a direct threat due to a significant risk of substantial harm to the health or safety of the employee, other employees, or the community than cannot be eliminated or reduced by reasonable accommodation.
- c. The employee requesting the reasonable accommodation will be notified in writing as to whether their request has been granted.

- d.** If a request for reasonable accommodation is denied, the employee will be required to obtain the necessary immunization or vaccination.
- e.** Reasonable accommodations from immunization/vaccination requirements are limited to medical contraindication(s) or religious accommodation:
  - i.** All employees requesting a reasonable accommodation based upon a medical contraindication must complete a Request for Accommodation: Medical Exemption From Vaccination Form and include documentation from a licensed Physician, Physician Assistant, or Nurse Practitioner who certifies the medical contraindication.
  - ii.** Medical contraindications may include, but are not limited to:
    - 1) Anaphylaxis allergies to one (1) or more of the vaccine ingredients.
    - 2) A history of a severe adverse reaction after receiving a previous COVID-19 mRNA vaccine or after receiving another vaccine or injection.
  - iii.** The City Manager or designee may, at their discretion, consult with an Infectious Disease Specialist regarding a request for reasonable accommodation based upon a medical contradiction and in accordance with applicable recommendations from the CDC.
  - iv.** The City promotes workforce diversity and an inclusive workplace for all employees as part of its equal employment opportunity commitments. If an employee's religious beliefs or practices conflict with the COVID-19 vaccination requirement, the employee must complete a Request for Accommodation: Religious Accommodation From Vaccination Form.
- f.** Employees who are granted a reasonable accommodation may be subject to reassignment and/or other forms of reasonable accommodation.
  - i.** An accommodation will not be provided if doing so creates an undue hardship for the City or the employee's unvaccinated status poses a direct threat to themselves, other employees, or the community.
  - ii.** The evaluation of whether the employee's unvaccinated status poses a direct threat to themselves, other employees, or the community may include, but is not limited to the following factors:
    - 1) Amount of contact that the employee has with the community and other employees in their job duties.
    - 2) The duration of the risk posed by the unvaccinated employee.
    - 3) The nature and severity of the potential harm.
    - 4) The likelihood that the potential harm will occur.
    - 5) The imminence of the potential harm.
    - 6) The costs and efficacy of changing the employee's job duties or relocating the employee.
    - 7) The costs and efficacy of providing an alternative means of infection control.

- 8) Whether any applicable law contemplates potential accommodations from immunization/vaccination.
  - 9) The impact of the specific disease or condition targeted by the required immunization/vaccination on the population being served by the employee.
  - 10) The number of individuals employed in the City department/division that would make the reasonable accommodation.
  - 11) The impact of the requested reasonable accommodation on the operation of the City department/division.
- g.** If an employee's request for reasonable accommodation is granted but the employee fails to comply with the reasonable accommodation provided by the City, the employee will be subject to corrective action, up to and including termination of employment. In such an instance, the following procedure will apply:
- i.** First, the employee will be placed suspension without pay.
  - ii.** If an employee does not obtain the required immunization/vaccination or comply with the reasonable accommodation provided by the City within thirty (30) days of being placed on suspension without pay, it will be considered as a voluntary resignation.
- h.** If an employee's request for reasonable accommodation is denied, the employee will be placed on suspension without pay.
- i.** If an employee does not obtain the required immunization/vaccination within thirty (30) days of being placed on suspension without pay, it will be considered as a voluntary resignation.
- i. Interactive Process**
- i.** The City will engage in an interactive dialogue with the employee to determine the precise limitations of the employee's ability to comply with this required vaccination policy and explore potential accommodations that could overcome those limitations. The City encourages employees to suggest specific reasonable accommodations. However, The City is not required to make the specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on the City or posing a direct threat to the employee or others in the workplace.

## **6. Policy Modification**

- a.** Government and public health guidelines and restrictions and business and industry best practices regarding COVID- 19 and COVID-19 vaccines are changing rapidly as new information becomes available, further research is conducted, and additional vaccines are approved and distributed. The City reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.

**C. FORM(S)**

1. Request for Accommodation: Medical Exemption From Vaccination Form.
2. Request for Accommodation: Religious Accommodation From Vaccination Form

**D. REFERENCE(S)**

1. None.

**E. DEFINITION(S)**

1. None.

**F. POLICY HISTORY**

1. This policy is a new policy.