

COVID-19 VACCINATION POLICY FOR HEALTH PROGRAM AND EARLY CHILDHOOD LEARNING LAB EMPLOYEES

I. Policy Section

14.0 Risk Management

II. Policy Subsection

14.19 COVID-19 Vaccination Policy for Health Program and Early Childhood Learning Lab Employees

III. Policy Statement

Grand Rapids Community College (GRCC) is committed to implementing proactive steps to protect the campus community from a communicable disease outbreak. Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace and the community as a whole.

While GRCC encourages all employees to receive a COVID-19 vaccination to protect themselves and others, the College recognizes that distinctive circumstances exist with regard to health program employees and employees working in its Early Childhood Learning Lab (ECLL). These circumstances include Federal regulations that relate to GRCC's clinical partners and Federal mandates relating to ECLL employees.

As a result of the aforementioned circumstances, this policy requires employees in GRCC Health Programs with clinical components to be vaccinated against COVID-19 unless they have obtained an exemption pursuant to the processes contained in this Policy. This Policy also requires ECLL employees who interact with Head Start Program students to be vaccinated against COVID-19 unless they have obtained an exemption pursuant to the processes contained in this policy.

This policy does not displace the provisions of any collectively bargained agreement to which GRCC is a party.

IV. Reason for the Policy

As a result of the COVID-19 pandemic, health organizations, including the Center for Disease Control and the Kent County Health Department, recommend that individuals be vaccinated against COVID-19. In addition, many of GRCC's clinical partners, including organizations subject to regulations issued by the Centers for Medicare and Medicaid Services, require

that GRCC employees who provide certain on-site and/or patient services be vaccinated against COVID-19. The U.S. Department of Health and Human Services has also revised Head Start Program Performance Standards so as to require some individuals employed in GRCC's Early Childhood Learning Laboratory ("ECLL") to be vaccinated.

V. Entities Affected by this Policy

All individuals employed in GRCC's ECLL who interact with Head Start Program students and all individuals employed in GRCC health programs with clinical components, including individuals employed in the following College Departments:

- Dental
- Nursing
- Occupational Therapy
- Radiologic Technology
- Workforce Training Health Programs
- Allied Health
- Child Development and Education.

VI. Who Should Read this Policy

All GRCC employees and students as well as external entities and organizations.

VII. Related Documents

14.13 Communicable Disease Policy

VIII. Contacts

Policy Owner: Executive Director, Operational Planning
Vice President for Finance and Administration
Provost and Executive Vice President for Academic Student Affairs
Executive Director, Human Resources
General Counsel
Director of Equal Opportunity Compliance

IX. Definitions

Fully Vaccinated Employee: Employees are considered fully vaccinated two (2) 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 (2) weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines; two (2) weeks after a single dose

vaccine, such as Johnson & Johnson's vaccine; or two (2) weeks after the second dose of any combination of two (2) doses of different COVID-19 vaccines as part of one vaccination series.

Partially Vaccinated Employee: Employees are considered partially vaccinated if they have received only one dose of a two-dose COVID-19 vaccine, or if they have completed primary vaccination with a COVID-19 vaccine, but two (2) weeks have not yet passed since completion.

X. Procedures

A. Scope and General Information

1. Applicability

This policy applies to all individuals employed in a GRCC health program with a clinical component, including student employees. This policy also applies to all individuals employed in the College's ECLL who interact with Head Start Program students.

In the event that legal mandates (or associated policies) relating to the ECLL and/or GRCC's clinical partners are modified, altered, or repealed, this policy may be updated.

2. Reporting

All employees to whom this Policy applies are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees who are subject to this policy were initially required to report their vaccination status to the College by January 24, 2022. New hires, or employees who subsequently become subject to this policy are required to report their vaccination status and, if vaccinated, provide proof of vaccination as soon as practicable. Employees may report their vaccination status and provide proof of vaccination via the online center.

Employees must provide truthful and accurate information about their COVID-19 vaccination status. Employees not in compliance with this policy will be subject to discipline as set forth within this policy and pursuant to the terms of any other applicable GRCC policy and/or any applicable collective bargaining agreement.

3. Vaccination Requirement

All employees initially covered by this policy were required to be vaccinated against COVID-19 by January 31, 2022. If an employee was not vaccinated by the aforementioned date, they were required to seek

and obtain an exemption from the College following the processes set forth in this policy. New hires or employees who become subject to this policy are required to be vaccinated as soon as practicable or seek and obtain an exemption pursuant to the process set forth in this policy. Any covered employee who seeks but does not obtain an exemption is required to be vaccinated as set forth in this policy.

4. Exemptions

a. Exemptions from Vaccination

Employees may request a medical exemption from vaccination 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 because of a disability. Employees may also seek a religious exemption if the vaccine conflicts with a sincerely held religious belief, practice, or observance.

In order to comply with Federal requirements, covered ECLL employees who request and obtain a vaccine exemption will be required to complete weekly COVID-19 testing. In the event that Federal requirements are modified or amended, GRCC reserves the right not to require weekly COVID-19 testing for ECLL employees who have received exemptions.

b. Exemption Requests

Requests for exemptions and reasonable accommodations relating to vaccination or (where applicable) testing must be initiated by the employee. Requests for exemptions and reasonable accommodations must be submitted as soon as practicable and shall adhere to the following process:

- *Medical Exemptions or Reasonable Accommodations.* Employees requesting a medical exemption may submit a request by completing and submitting GRCC's COVID-19 Medical Exemption Request Form via the online center. Employees requesting a reasonable accommodation should contact GRCC's Office of General Counsel. Documentation from a medical provider is required to receive a medical exemption and may be required to receive a reasonable accommodation.

- *Religious Exemptions.* Employees requesting a religious exemption may submit a request for a religious exemption by completing and submitting GRCC's COVID-19 Religious Exemption Form via the online center.

B. Processes

1. Vaccination

Any covered employee that has not obtained an exemption or accommodation must be vaccinated against COVID-19.

Any covered employee who has not received an exemption and who is not fully vaccinated (including partially-vaccinated employees) may be precluded from working in the ECLL or in any GRCC health program with a clinical component.

Employees may schedule their vaccination appointments through an on-site clinic, their own medical provider, local pharmacies, or with a mass-vaccination clinic with local health departments. Employees will be granted up to four (4) hours of paid leave time for each vaccination if such vaccination is obtained during standard working hours.

An employee electing to become vaccinated subsequent to the dates noted in this Policy may submit their documentation once complete.

2. Proof of Vaccination

a. Vaccinated Employees

All vaccinated employees who are subject to this policy are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted via the online center.

The following constitutes acceptable proof of vaccination under the Policy:

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

Proof of vaccination should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the health care provider(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(s); in those circumstances, GRCC will still accept the state immunization record as acceptable proof of vaccination.

b. All Employees

All employees who are subject to this policy, both vaccinated and unvaccinated, must inform GRCC of their vaccination status.

Records relating to employee vaccination status will be maintained by GRCC's Human Resources Department. Records relating to employee vaccination status will be treated in accordance with all applicable laws and college policies on confidentiality and privacy.

C. Supporting COVID-19 Vaccination

An employee may take up to four (4) hours of duty time per dose to travel to a 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 (2) 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 days, personal days) to cover the additional time. If an employee is vaccinated outside of their regularly scheduled shift, they will not be compensated.

Employees will be granted up to one (1) day of paid leave to be used if they have side effects from the COVID-19 vaccination that prevent them from working. Employees needing additional time may use their accrued sick leave.

The following procedures apply for requesting and granting duty time to obtain the COVID-19 vaccine or sick leave to recover from side effects:

1. Employees should inform their supervisor of their upcoming appointment to get the COVID-19 vaccine and the date/time to determine if time off is needed. If time off is needed, hours are logged as sick leave on the employee's timesheet, and noted as "COVID vaccine time" on the notes column of their timesheet.

2. If an employee is having side effects from the COVID-19 vaccine, the employee should notify their supervisor that they are unable to work. Up to eight (8) hours of paid leave relating to side effects may be logged as sick time and identified as "COVID vaccine time" on the notes column of an employee's timesheet.

D. Employee Notification of COVID-19 and Removal from the Workplace

Covered employees who receive a positive COVID-19 test or are diagnosed with COVID-19 must promptly notify GRCC. This Policy does not alter or amend GRCC's COVID-19 protocols for employees who test positive for COVID-19 or receive a COVID-19 diagnosis (or for employees who are experiencing COVID-19 symptoms or are at a possible high-risk of exposure to COVID-19).

Pursuant to GRCC's COVID-19 protocols, any employee who receives a positive COVID-19 test or is diagnosed with COVID-19 must notify the GRCC COVID Health Screening Team by self-reporting via the form in the online center.

All employees who test positive for COVID-19 or receive a COVID-19 diagnosis will be immediately prohibited from the workplace, directed to stay at home in isolation, and asked to contact their primary healthcare provider. Employees may return to campus once the following have occurred:

- The employee has experienced at least twenty-four (24) hours with no fever without the use of fever reducing medications;
- The employee's symptoms have significantly improved; and
- It has been at least ten (10) days from initial start of the employee's symptoms for symptomatic positives, and at least ten (10) days from the test or diagnosis for asymptomatic positives.

Employees who have received a positive test or diagnosis should contact their supervisor and follow normal absence procedures.

E. COVID-19 Testing

All covered ECLL employees who are not fully vaccinated will be required to comply with provisions of this Policy related to testing.

Covered ECLL employees who are not fully vaccinated who report to the workplace must be tested at least once every seven (7) days for COVID-19.

Covered employees must do the following:

- Must be tested for COVID-19 on a Monday or Tuesday of the week that they report to work; and
- Must provide documentation of the most recent COVID-19 test result to GRCC no later than Thursday of that week

The cost of off-site testing is the employee's responsibility. Employees who elect to participate in off-site testing should be aware that all tests must be subject to independent confirmation in order to comply with this policy.

If applicable legal mandates are still in place once GRCC stops providing on-site testing, unvaccinated and partially-vaccinated employees will be responsible for obtaining weekly testing and submitting results as required by this policy.

Any covered ECLL unvaccinated or partially-vaccinated employee who does not report to the workplace during a period of seven (7) or more days (e.g., if they were on leave for more than seven [7] days) prior to returning to the workplace) must do the following:

- Must be tested for COVID-19 within seven (7) days prior to returning to the workplace; and
- Must provide documentation of that test to GRCC upon returning to the workplace.

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

F. New Hires

All new covered employees are required to comply with the vaccination requirements outlined in this policy as soon as practicable and as a condition of employment.

All new covered employees are required to inform GRCC of their vaccination status in accordance with the above-stated requirements of this policy at the time of their hiring.

Potential candidates for employment will be notified of the requirements of this policy prior to the commencement of their employment.

G. Confidentiality and Privacy

All medical information collected from individuals, including vaccination information, will be treated in accordance with applicable laws and College Policies on confidentiality and privacy.

H. Discipline

In an effort to protect the community and ensure the College's compliance with applicable legal mandates, employees who are found to have violated this policy may be subject to corrective action, which may include discipline. Corrective actions steps will normally be taken in the following order when an incident of non-compliance occurs:

- First Incident: Record of Conversation (confirmed via email);
- Second Incident: First Written Warning;
- Third Incident: Final Written Warning;
- Fourth Incident: Termination.

An example of non-compliance may include an employee's failure to notify GRCC of their vaccination status as required by this policy.

I. Non-Retaliation

GRCC prohibits any form of discipline, reprisal, intimidation or retaliation for reporting a violation of this policy or any other injury, illness, or health or safety concern.

XI. Forms

COVID-19 Medical Exemption Request Form
COVID-19 Religious Exemption Request Form
Disability Accommodation Request Form

XII. Effective Date

January 17, 2022

XIII. Policy History

January 17, 2022: Policy implemented.

February, 2023: Policy revised to reflect rescission of GRCC's Face-Covering Policy and applicable timelines for covered employees.

XIV. Next Review/Revision Date

February, 2024, or upon further modifications of applicable legal mandates and/or policy mandates imposed by GRCC's clinical partners for health programs.