

Carlos Rosario School Policy Requiring Full Vaccination for All Employees

Issue Date: August 29, 2022

Purpose

Following changes in COVID guidelines nationally and in the District of Columbia, *the school has developed a policy that is designed to be flexible and responsive to new guidelines that may be issued by CDC, OSSE, and DC Health.* According to the CDC, staying up to date with COVID-19 vaccination is the leading public health strategy to prevent severe disease caused by COVID-19 virus. Not only does it provide individual-level protection, but high vaccination coverage reduces the burden of COVID-19 on people, schools, healthcare systems, and communities. Thus, the school will continue to provide information about COVID-19 vaccines, encourage trust and confidence in the vaccine, and establish supportive policies and practices that makes getting vaccinated easy and convenient including hosting vaccination clinics. Starting fall semester 2022, the school will receive the largest number of students for in-person classes since the COVID-19 pandemic began and all employees are expected to be working in-person regularly. The School requires all employees, contractors, volunteers, and interns who regularly come to campus to be fully vaccinated.

Scope and Deadline

Beginning Monday, November 1, 2021, as a condition of employment, all employees have been required to be fully vaccinated against COVID-19 unless they have been granted an exemption for medical or religious reasons and comply with the weekly testing requirements. The school has abandoned requiring weekly testing for those employees who are not fully vaccinated following expiration of the law mandating this practice. Those seeking a medical or religious accommodation must submit an accommodation request to Human Resources. Individuals who previously received a religious or health exemption do not need to resubmit the exemption request. Currently, the school doesn't require employees to be up to date with their COVID-19 vaccination i.e., taking all recommended booster doses. We strongly encourage employees who have questions regarding the vaccine to contact their healthcare provider.

The vaccine requirement will apply to all new hires, and new job postings will inform applicants of the vaccination requirement.

The vaccine requirement will also apply to contractors, volunteers, and interns who regularly enter School campus buildings.

- For questions about volunteer and intern vaccination requirements, contact Human Resources. It is critical that volunteers and interns complete onboarding and be cleared by HR prior to allowing them to start and visit campus. This includes submitting proof of vaccination to HR.
- This will not include contractors who visit campus on a one-time or periodic basis (i.e., once a month). All other contractors of the School and CCC are required to

complete written vaccination certifications for their workers prior to coming to campus.

Policy Details

Below are additional details regarding vaccination requirement:

- **“Full Vaccination” or “Fully Vaccinated”** – This means it has been 2 weeks or longer since receiving the primary series of the COVID-19 vaccine – e.g., both doses for Pfizer or Moderna, or one dose for Johnson & Johnson. Employees who are fully vaccinated must submit proof of vaccination via the Benefits App, a smartphone application employees have been using to submit their COVID-19 information to the school. Acceptable proof of vaccination is one of the following:
 - A scan or image of a CDC COVID-19 Vaccination Record Card, or a copy of an official vaccination record from a government body (if vaccinated outside the United States or at a US vaccination site that did not issue CDC Cards).
 - A printout or screenshot of their vaccination status from the DC Health database or other certification from DC Health or other jurisdiction of full vaccination. This does not include screenshots from V-Safe or similar sites whose information is based on individual self-reporting and not health department vaccination records.
 - Record from healthcare professional that administered the vaccinations.

Employees should contact HR if they need time off for COVID-19 vaccination including booster doses.

Individuals may request an exemption for medical or religious reasons. Those seeking a medical or religious accommodation must submit an accommodation request to Human Resources.

- **Medical or Religious Exemptions Generally:** Employees in need of an exemption from being vaccinated due to a medical reason, or because of a sincerely held religious belief must submit a completed Request for Accommodation form to the Human Resources Department as soon as possible after the issuance of this policy. Accommodations will be granted where appropriate and do not cause the School undue hardship or pose a direct threat to health or safety.
- *Pursuant to the School’s nondiscrimination policies, the School will not tolerate discrimination or retaliation against anyone on grounds of religion, disability, or other protected status. The School also maintains the privacy of individual medical information, including vaccination status, except as necessary to comply with applicable law or implement health and safety measures such as COVID testing and contact tracing.*
- On the exemption request form employees will attest that they understand that COVID vaccinations are approved by FDA and it is agreed by local and national public health authorities the consequences of not getting COVID vaccination include increasing the odds of becoming sick and spreading the disease to others

who are not able to protect themselves, and with continuing COVID-19 transmission, the more variants that are likely to be seen.

- **Religious Exemption additional information:** The religious exemption may apply to:
 - Persons who object in good faith and in writing pursuant to procedures established by the School that the person’s vaccination would violate their sincerely held religious beliefs; and
 - the vaccination would in fact violate a sincerely held religious belief of the person; and
 - the granting of the religious exemption would not impose an undue burden or pose a direct threat to health or safety in the workplace consistent with federal and other applicable religious accommodations law. (For religious accommodations, undue hardship is defined as “more than de minimus” cost or burden on the operations of the employer’s business and is determined on a case-by-case basis.)
- **Medical Exemption additional information:** The medical exemption may apply to:
 - Persons who have obtained and submitted written certification from a physician or other licensed health professional stating that vaccination for COVID-19 is medically inadvisable due to the person’s medical condition; and
 - If the condition making the vaccine medically inadvisable is temporary, the physician or other licensed health professional should specify in the certification the date on which, or the change in condition upon which, taking the vaccine would no longer be medically inadvisable, and the person must receive their first dose of the COVID-19 vaccine within 30 days after the specified date or event when taking the vaccine would no longer be medically inadvisable and their second dose (if applicable) within the time period established in the dosing schedule for the vaccine.
 - The granting of the medical exemption would not impose an undue burden or pose a direct threat to health or safety in the workplace consistent with federal and other applicable law. (For medical/disability accommodations, undue hardship is defined as “significant difficulty or expense” and is determined on a case-by-case basis.)