

### Seven Hills COVID-19 Policy for Rhode Island Staff

Rev. 1.19.22

### **Purpose:**

On Monday January 10, 2022, the United States reported 1.35 million new coronavirus infections, the highest daily total for any country in the world, which is impacting every aspect of daily life. This alarming number is impacting our ability to provide a continuum of care across our affiliates at Seven Hills. Because of the continuing rise of active infections, Seven Hills Foundation & Affiliates (Seven Hills) is instituting this policy.

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation. Seven Hills has adopted this policy on mandatory vaccination to safeguard the health of our employees, those we support and our communities from the hazard of COVID-19.

This policy complies with OSHA's Emergency Temporary Standard (29 CFR 1910.501).

### Scope:

This Mandatory COVID-19 Vaccination Policy applies to Seven Hills Rhode Island (SHRI) employees.

# **Policy:**

All employees covered by this policy are required to be *fully vaccinated* as a term and condition of employment by March 14, 2022.

All employees are required to report their vaccination status and to provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees not in compliance with this policy will be subject to disciplinary action up to and including termination of employment.

Employees who do not comply with this policy, will be placed on unpaid administrative leave for a period not to exceed thirty (30) days to allow the employee time to consider their options. An employee may use accrued vacation or personal time during this leave of absence. Limited sick time may only be used if the employee is in the process of vaccination and exhibits side effects. If a staff member leaves employment at Seven Hills due to non-vaccination compliance, baring a sufficient medical/religious reason for choosing not to be vaccinated, claimants have been found ineligible for unemployment benefits in Massachusetts and Rhode Island.

#### **Exception Requests:**

Employees may request an exception from this mandatory vaccination policy if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Medical documentation will be required. 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 the employee (using the exemption form found at (<a href="https://staff.sevenhills.org/COVID-19-Vaccine-Policy-Resources-Staff">https://staff.sevenhills.org/COVID-19-Vaccine-Policy-Resources-Staff</a>) and submitted to Marissa Ruff, Vice President of Seven Hills Rhode Island <a href="mailto:mruff@sevenhills.org">mruff@sevenhills.org</a> or to Ali Suenaert, Sr HR Generalist for Seven Hills Rhode Island <a href="mailto:asuenaert@sevenhills.org">asuenaert@sevenhills.org</a> . All such requests will be handled in accordance with applicable laws and regulations and Seven Hills' policies. <a href="mailto:Please submit">Please submit</a> all exception requests on or before January 24, 2022.

### **Overview and General Information**

All employees covered by this policy must be fully vaccinated no later than March 14, 2022. To be fully vaccinated by March 14, 2022, an employee must obtain their two doses as outlined below:

Pfizer - First dose no later February 7, 2022 - second dose no later than February 28, 2022.

Moderna - First dose no later than January 31, 2022 - second dose no later than February 28, 2022.

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 of the Pfizer or Moderna vaccine, or the single dose of the Johnson & Johnson vaccine. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, 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.

Please visit the following site for a list a vaccination sites in Rhode Island and Massachusetts. Seven Hills will also be holding additional vaccine clinics in the month of January, and they are continuing to be promoted to all Seven Hills staff.

MA - <u>COVID-19 vaccination locations | Mass.gov</u> RI - Vaccine Information | RI COVID-19 Information Portal

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

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted to your immediate supervisor or sent via email to Ali Suenaert, SR HR Generalist, at <a href="mailto:asuenaert@sevenhills.org">asuenaert@sevenhills.org</a>.

Acceptable proof of vaccination status is:

- 1. The record of immunization from a healthcare 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 healthcare professional(s) or clinic site(s) administering the vaccine(s).

To comply with the federal mandate, all employees must inform Seven Hills of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

Vaccination Status	Instructions	Deadline
Employees who are fully vaccinated.	Submit proof of vaccination that indicates full vaccination.	January 21, 2022
Employees who are partially vaccinated (i.e., one dose of a two dose vaccine series).	Submit proof of vaccination that indicates when the first dose of vaccination was received, followed by proof of the second dose when it is obtained.	January 21, 2022
Employees who have not yet been vaccinated but intend to be vaccinated.	Submit statement that you are unvaccinated but intend to get vaccinated.	January 21, 2022
Employees who have not yet been vaccinated and do not intend to be vaccinated.	Submit a statement that you are unvaccinated and do not intend to get vaccinated.	January 21, 2022

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

An employee may take up to four hours of sick time per dose to travel to the vaccination site, receive a vaccination, and return to work for a maximum of eight hours of sick time for employees receiving two doses. 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 additional sick leave. If an employee is vaccinated outside of their scheduled work time, they will not be compensated.

Employees may utilize up to two workdays of sick leave 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

In accordance with OSHA ETS, Seven Hills will require employees to promptly notify their supervisor 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

Seven Hills 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 (i.e., immediately send them home or to seek medical care, as appropriate).

### Return to Work Criteria

Under CDC's <a href="https://www.cdc.gov/media/releases/2021/s1227-isolation-quarantine-guidance.html">https://www.cdc.gov/media/releases/2021/s1227-isolation-quarantine-guidance.html</a> asymptomatic employees may return to work once five days have passed since the positive test, and symptomatic employees may return to work after all the following are true:

- At least five days have passed since symptoms first appeared, and
- At least 24 hours have passed with no fever without fever-reducing medication, and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

# **COVID-19 Testing**

Ongoing testing may be required by federal, state and licensing agency mandates.

### **Face Coverings**

Seven Hills will continue to require all staff to wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. In any program with positive COVID-19 cases, employees must be fit tested for N95s and wear them throughout the shift.

The following are exceptions to Seven Hills'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 Seven Hills 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:**

Effective immediately, all new employees are required to comply with the vaccination requirements outlined in this policy prior to their first date 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 because 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 your Marissa Ruff, Vice President of Seven Hills Rhode Island, or Ali Suenaert, SR. HR Generalist for Seven Hills Rhode Island.