Guidance and Procedures for Implementation of the Mandatory COVID-19 Vaccination Policy

(2021-03 Mandatory COVID-19 Vaccination Policy)

**Receiving and Documenting Vaccination**

**Timing:** All Workforce Members must receive their first dose of the vaccine (and upload proof of vaccination) no later than **September 10, 2021** and any applicable second dose (and upload proof of vaccination) no later than **October 15, 2021**. Workforce Members will not be considered to have met these deadlines without uploading proof of vaccination.

The deadline to apply for an exemption is **August 30, 2021**. Please review the relevant exemption sections for more information on specific timeframes and guidance. Workforce Members who have been denied an exemption after September 10, 2021 shall have ten (10) days from the date of the notice of denial to receive the vaccine (either a single dose vaccine or first dose of a two-dose vaccine). An extension will be considered granted from these dates if the denial of an exemption occurs less than 10 days from September 10, 2021.

**Where to Receive Vaccination(s):** Appointments to receive the COVID-19 vaccine are available at UConn Health at no cost for Workforce Members. Appointments can be scheduled through the UConn Health Vaccine Call Center at 860-679-5589, through your own medical provider if you are not a UConn Health patient, by visiting the Outpatient Pavilion 1st floor during normal hours of operation, or with another provider identified through the state’s vaccination portal. Workforce Members are not required to receive vaccination at UConn Health, but are encouraged to do so.

**Approved Types of Vaccine:** Workforce Members will meet the COVID-19 vaccine requirement if they have been vaccinated with a COVID-19 vaccine that has either been authorized for use in the United States by the Food and Drug Administration (FDA) or been authorized for use outside of the United States by the World Health Organization (WHO). International Workforce Members must present proof of vaccination in the form of a copy of the WHO Certificate of Vaccination (WHO Vaccine Booklet) or documentation to include a statement signed by a healthcare provider/organization authorized to administer the vaccination attesting to the dates and name of COVID-19 vaccination given. All documentation must be submitted in English or accompanied by a certified translation at the student’s expense. International students who have received COVID-19 vaccines not authorized by the FDA or WHO will be managed on a case-by-case basis.

**Proof of Vaccination:** All Workforce Members will be required to provide proof of COVID-19 vaccination. Proof of vaccination must be uploaded for each dose in order to comply with the timing requirements. Workforce Members will be required to upload their proof of vaccination by logging into an online portal created for this purpose.
Exemption Requests

Medical Exemption or Medical Deferral

Workforce Members who believe that they have a medical condition that prevents them from receiving or necessitates a delay in receiving the COVID-19 vaccine may request a medical exemption or deferral. Workforce Members requesting a medical exemption or a medical deferral must complete and submit Section I of the Medical Exemption, Medical Deferral, or Personal Deferral Request form by **August 30, 2021**. If a Workforce member is unable to obtain documents to support their exemption request by the deadline the employee will be granted up to thirty (30) days to submit information from their healthcare provide to support their request for an exemption. Detailed instructions on this requirement are located directly on the Medical Exemption, Medical Deferral, or Personal Deferral Request form.

The Medical Exemption/Deferral Review Committee, consisting of Human Resources, Employee Health/Occupational Medicine, and Infectious Disease clinicians, will make final determinations regarding all medical exemption and deferral requests. The Medical Exemption/Deferral Review Committee will evaluate each Medical Exemption, Medical Deferral, or Personal Deferral Request form and supporting documentation. Workforce Members may be asked to submit additional documentation to support their exemption or deferral request and/or their healthcare provider may be contacted for the purpose of obtaining additional information. The committee will approve or deny the request, which will be communicated to the requestor. If approved, an exempted Workforce member’s vaccination status will be shared only to the extent necessary to enforce protective restrictions and monitoring. However, the nature and details of any exemption or deferral request will remain confidential by the exemption committee.

All requests are pending until the requestor receives notice of an approval or denial. If no decision has been made by September 10th, requestors must comply with the protective guidelines (including weekly testing and enhanced PPE) outlined in this policy until a decision is made. Individuals who are denied an exemption after September 10th shall have ten (10) days from the date of the notice of the denial to receive the vaccine (either a single dose vaccine or first dose of the 2 dose vaccine).

**Examples of medical conditions that will be considered for exemption:**

- A documented history of severe or immediate-type allergic reaction to any ingredient of all currently available COVID-19 vaccine brands. (Vaccine ingredients for each of the vaccine brands is available at: https://www.cdc.gov/vaccines/covid-19/eua/index.html). There must be a documented severe or immediate-type allergic reaction to an ingredient in all three available vaccines, medical contraindications to
all three, or a combination that would not allow an individual to receive any of the three available vaccines.

- A documented history of severe allergy or immediate-type hypersensitivity reaction to a previous COVID-19 vaccination, and also a separate contraindication to all currently available COVID-19 vaccine brands.

**Examples of medical conditions that will be considered for deferral:**

- **Active treatment for a medical condition**
  - Medication-induced immunocompromised condition that is temporary in nature and results in the vaccine to not be considered effective.

- **Prior positive COVID-19 test:**
  - A Workforce member may request a deferral of vaccination if they have had a COVID-19 positive test within 30 days or if they were treated with Monoclonal Antibody infusion within 90 days of the request. If a Workforce member tests positive for COVID-19 after the first vaccine, they must consult with the COVID-19 Call Center.

- **Scheduled surgery:**
  - Workforce Members should consult with the surgeon to determine if their vaccination should be scheduled to a later date. A note from surgeon deferring the vaccine will be requested, and it should include the date when the individual should be able to get vaccinated.

**The following conditions are not considered medical contraindications to COVID-19 vaccination:**

- A history of allergy or anaphylaxis to foods, antibiotics, other oral medications, pets, venom, other environmental allergies, or non-COVID vaccines
- A history of latex allergy
- Individuals who do not eat eggs or gelatin
- Family history of adverse vaccine reactions or autoimmune conditions
- Fear of needles or general avoidance of vaccines

**Religious Exemptions**

Workforce Members may request an exemption on the basis of a sincerely held religious belief or practice that prohibits them from receiving the COVID-19 vaccination by completing the *Religious Exemption Request* form. The Religious Exemption Review Committee, comprised of Human Resources, legal, and religious services members will make final determinations regarding all religious exemption requests. Workforce Members must request a religious exemption no later than **August 30th, 2021**. If a Workforce member is unable to obtain documents by the deadline to support their exemption request the employee
will be granted up to thirty (30) days to submit additional information in support their request for an exemption. The Religious Exemption Review Committee will approve or deny the request, which will be communicated to the requestor. If granted exemption, vaccination status will be shared only to the extent necessary to enforce protective restrictions and monitoring. However, the nature and details of your exemption request will remain confidential by the exemption committee.

All requests are pending until the requestor receives notice of an approval or denial. If no decision has been made by September 10th, requestors must comply with the protective guidelines (including weekly testing and enhanced PPE) outlined in this policy until a decision is made. Individuals who are denied an exemption after September 10th shall have ten (10) days from the date of the notice of the denial to receive the vaccine (either a single dose vaccine or first dose of the 2 dose vaccine).

**Personal Deferrals**

Workforce Members under very limited circumstances may qualify for a personal deferral. Those qualified Workforce Members may request a personal deferral by completing and uploading the *Medical Exemption, Medical Deferral, or Personal Deferral Request form by August 30, 2021.*

Only the following circumstances will be considered for a personal deferral:
- Pregnancy (proof of pregnancy required)
- Breastfeeding for a period of twelve (12) months from the birth of the child
- Currently on block leave and will not return to work until after September 10, 2021.
  Workforce Members on an approved block leave are not required to complete the weekly testing requirements outlined in this policy.

Human Resources will verify the above circumstances and inform Workforce Members of their approved deferral period. Workforce Members must receive confirmation from Human Resources in order to be granted a personal deferral. If no decision has been made by September 10th, requestors must comply with the protective guidelines (including weekly testing and enhanced PPE) outlined in this policy until a decision is made. Individuals who are denied an exemption after September 10th shall have ten (10) days from the date of the notice of the denial to receive the vaccine (either a single dose vaccine or first dose of the 2 dose vaccine).

**New Hires/Appointments**

UConn Health will require all new hires and appointments to comply with the vaccination requirements outlined in this policy as a condition of employment/appointment. Potential candidates for employment/appointment will be notified of the requirements of this policy prior to the start of employment. All new hires must receive at least the first dose of vaccine
prior to the start date, or an exemption request must be submitted and approved in advance.

**Unvaccinated Workforce Member Protective Requirements**

If a Workforce member is approved for a religious or medical exemption or deferral, the Workforce member will be required to comply with the following protective measures:

- Receive a weekly COVID-19 NAAT or PCR testing. Full instructions to follow on how Workforce Members can schedule and fulfill their weekly testing requirement.
- Must follow the present travel guidelines for out-of-state travel with HR documentation and obtain a COVID-19 NAAT or PCR (not rapid antigen) test before returning to work following any out-of-state travel that lasts 24 hours or more. Additional testing following travel may be required under the instruction of the COVID-19 Call Center clinicians.
- Be required to wear a mask at ALL times while working and required to wear protective eyewear when providing clinical care to all patients and an N95 or equivalent respirator when performing any aerosol-generating procedure on any patient.

Updates to these requirements may be made based on evolving state and federal public health guidance.

Any Workforce member who is awaiting a decision from the Exemption Committees and in which no decision has been made by September 10, 2021 must also comply with this section. If an exemption is granted, the Workforce member must continue to adhere to this section. If an exemption is denied, the Workforce member has ten (10) days to receive their first dose.

**Sanctions**

Workforce Members who have not received an approved exemption or deferral and who have not received the first dose by September 10, 2021 may be subject to disciplinary action. Discipline for non-compliance shall be administered in accordance with existing progressive disciplinary processes, up to and including termination/dismissal.