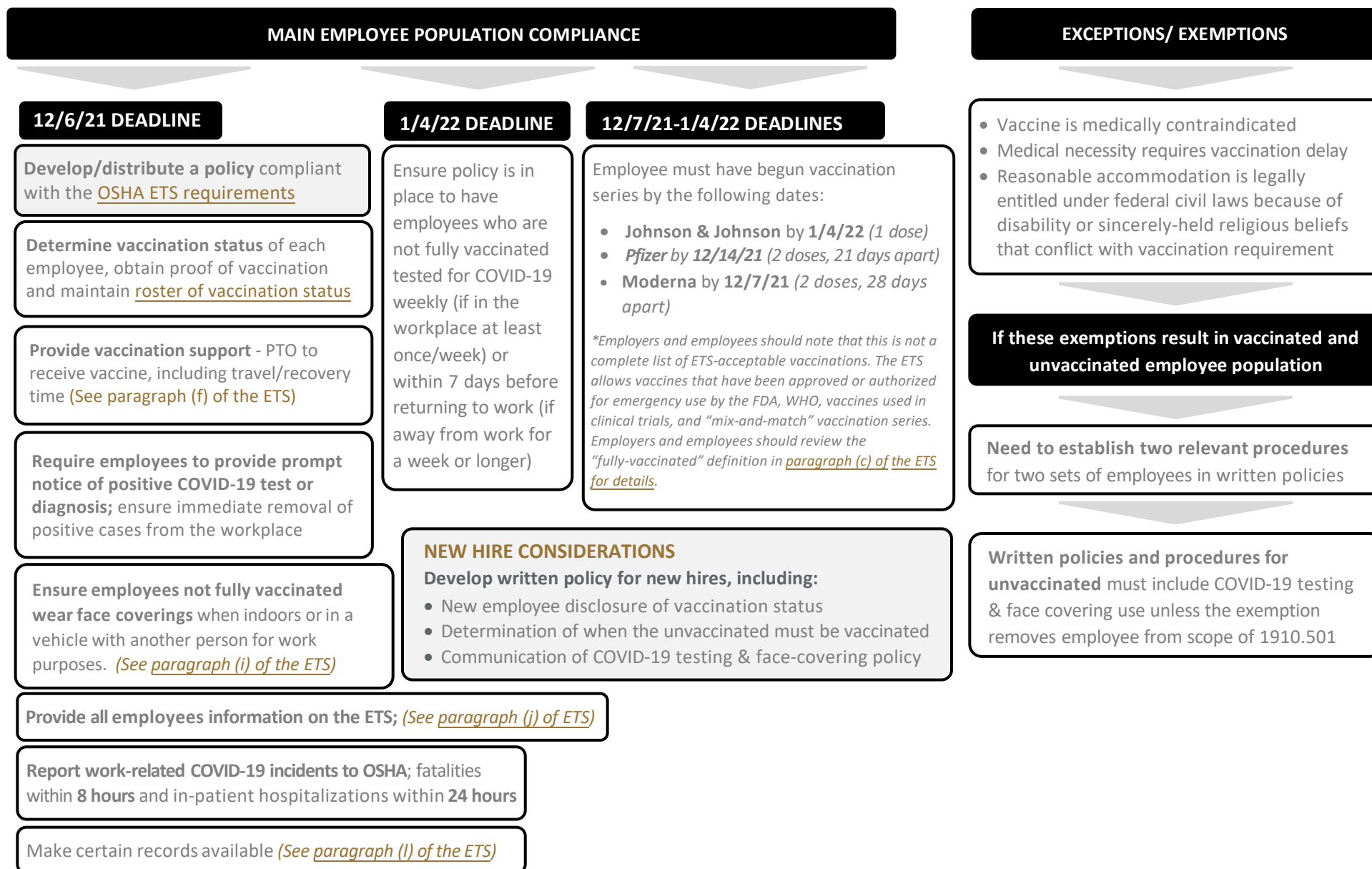


GUIDELINES FOR EMPLOYERS WHO HAVE CHOSEN TO MAKE COVID-19 VACCINATIONS MANDATORY AS A CONDITION OF EMPLOYMENT FOR ORGANIZATIONS WITH 100+ EMPLOYEES



MAIN EMPLOYEE POPULATION COMPLIANCE

12/6/21 DEADLINE

Develop/distribute a policy compliant with the [OSHA ETS requirements](#)

Determine vaccination status of each employee, obtain proof of vaccination and maintain [roster of vaccination status](#)

Provide vaccination support - PTO to receive vaccine, including travel/recovery time (See [paragraph \(f\) of the ETS](#))

Require employees to provide prompt notice of positive COVID-19 test or diagnosis; ensure immediate removal of positive cases from the workplace

Ensure employees not fully vaccinated wear face coverings when indoors or in a vehicle with another person for work purposes. (See [paragraph \(i\) of the ETS](#))

Provide all employees information on the ETS; (See [paragraph \(j\) of the ETS](#))

Report work-related COVID-19 incidents to OSHA; fatalities within 8 hours and in-patient hospitalizations within 24 hours

Make certain records available (See [paragraph \(l\) of the ETS](#))

1/4/22 DEADLINE

Ensure policy is in place to have employees who are not fully vaccinated tested for COVID-19 weekly (if in the workplace at least once/week) or within 7 days before returning to work (if away from work for a week or longer)

12/7/21-1/4/22 DEADLINES

Employee must have begun vaccination series by the following dates:

- Johnson & Johnson by 1/4/22 (1 dose)
- Pfizer by 12/14/21 (2 doses, 21 days apart)
- Moderna by 12/7/21 (2 doses, 28 days apart)

**Employers and employees should note that this is not a complete list of ETS-acceptable vaccinations. The ETS allows vaccines that have been approved or authorized for emergency use by the FDA, WHO, vaccines used in clinical trials, and "mix-and-match" vaccination series. Employers and employees should review the "fully-vaccinated" definition in [paragraph \(c\) of the ETS for details.](#)*

NEW HIRE CONSIDERATIONS

Develop written policy for new hires, including:

- New employee disclosure of vaccination status
- Determination of when the unvaccinated must be vaccinated
- Communication of COVID-19 testing & face-covering policy

EXCEPTIONS/ EXEMPTIONS

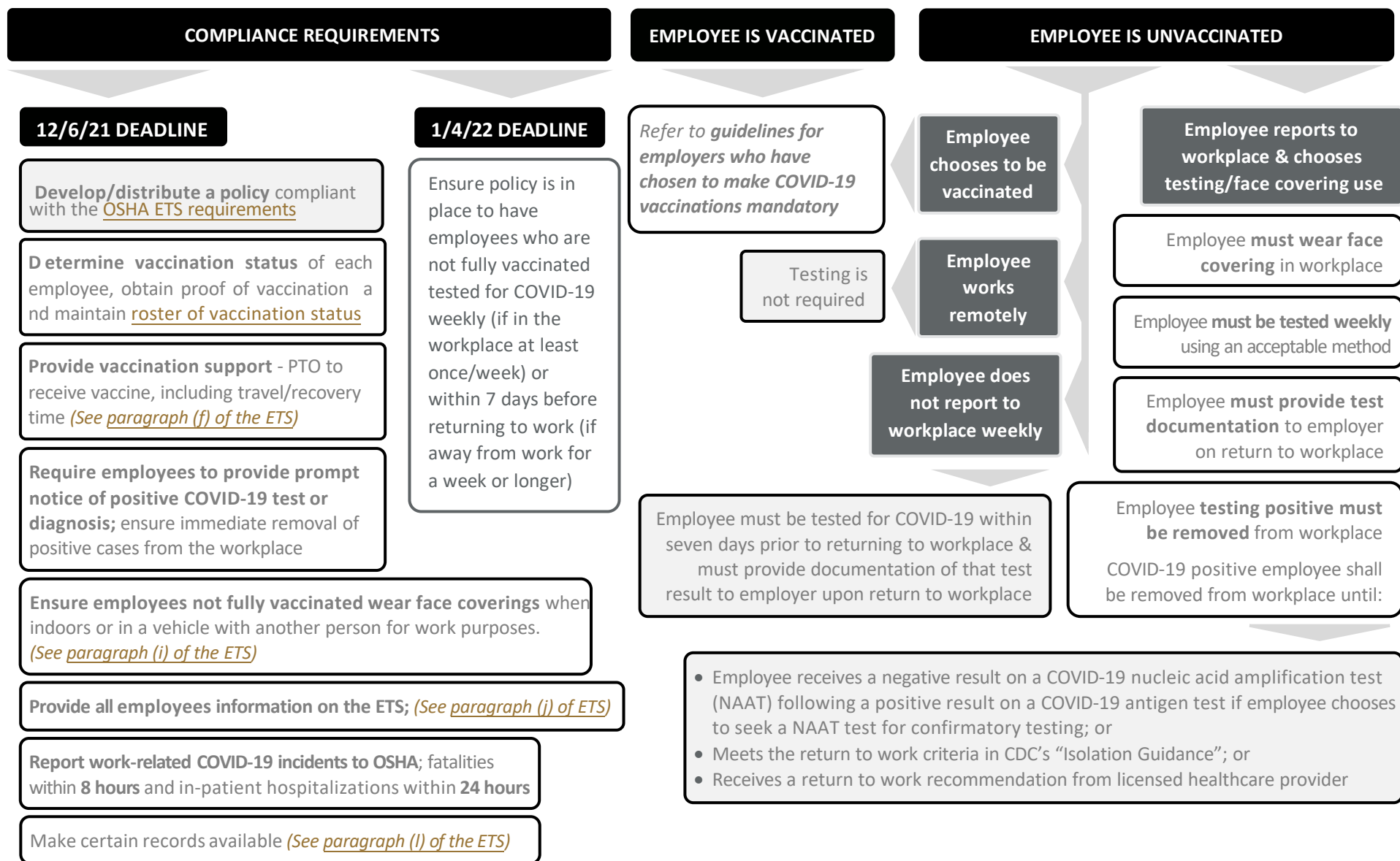
- Vaccine is medically contraindicated
- Medical necessity requires vaccination delay
- Reasonable accommodation is legally entitled under federal civil laws because of disability or sincerely-held religious beliefs that conflict with vaccination requirement

If these exemptions result in vaccinated and unvaccinated employee population

Need to establish two relevant procedures for two sets of employees in written policies

Written policies and procedures for unvaccinated must include COVID-19 testing & face covering use unless the exemption removes employee from scope of 1910.501

GUIDELINES FOR EMPLOYERS WHO HAVE CHOSEN TO ALLOW EMPLOYEE CHOICE BETWEEN COVID-19 VACCINATION, TESTING, AND FACE COVERING FOR ORGANIZATIONS WITH 100+ EMPLOYEES



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