



## **COVID-19 Vaccination Policy**

### **Policy:**

The mission of Open Arms Free Clinic (O AFC) is to better understand, and serve with compassion, the health and wellness needs of low-income, uninsured, and underinsured residents of Walworth County. This is accomplished through the work of dedicated staff, volunteers, and students. In order to best serve and protect all O AFC constituents, it is imperative to act in a socially responsible manner to help mitigate the spread of COVID-19. It is O AFC's responsibility to provide and maintain a workplace environment that is free of known hazards. This includes ensuring that all staff, students and volunteers are vaccinated for COVID-19.

### **Procedures Overview and General Information:**

Staff members 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. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as the Johnson & Johnson vaccine, 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. O AFC reserves the right to modify the definition of fully vaccinated to comply with applicable federal and state laws as well as CDC guidelines.

As of February 1, 2022, all staff (defined as paid employees, volunteers, and students) must provide documentation of COVID-19 vaccination, regardless of where they received vaccination, reflecting an FDA-authorized COVID-19 vaccine, or if vaccinated outside of the United States, a COVID-19 vaccine listed for emergency use by the World Health Organization (WHO). This may be accomplished by providing acceptable proof of vaccination status in one of the following manners:

- a. Print out obtained from the Wisconsin Immunization Registry (WIR)
  - b. Signed electronic record from another employer's Employee Health Department
  - c. Electronic chart record from an outside medical provider/health system/retail pharmacy
  - d. **Copy of COVID vaccine cards are not accepted.**
2. A copy of the completed **Vaccine Verification Form** (see attachments) must be submitted to the Executive Director for clinic record retention.



Staff members who are unable to meet the February 1, 2022 deadline will be placed on unpaid leave for up to forty-five (45) calendar days. If proof of vaccination is received prior to completion of the 45 day period, they will be authorized to continue their association with O AFC. If at the end of the unpaid leave period the staff member, student or volunteer is not fully vaccinated, their association with O AFC may be terminated.

#### **COVID-19 Testing / Face Coverings:**

Staff members may request an exception from this mandatory vaccination policy if the vaccine is medically contraindicated for them, medical necessity requires a delay in vaccination or employees have an objection based upon a sincerely held religious belief, practice or observance. An employee must present documentation using the **COVID-19 Vaccination – Medical/Religious Observation Declination Form** (see attachments).

- a. Requests will be reviewed by a committee composed of the O AFC Medical Director, O AFC designated Board member, and O AFC Executive Director.
- b. An individual who is denied an exemption can appeal in writing within five (5) business days of written denial notification.
- c. Accommodations may be granted if they do not create an undue hardship for O AFC and/or do not pose a direct threat to the health or safety of patients, volunteers or students.
- d. All such requests will be handled in accordance with applicable laws and regulations.

Staff members who have been granted accommodations will be required to undergo weekly COVID-19 testing and wear an approved face covering in compliance with this policy for testing and face coverings at all times when engaging with patients, students, or volunteers unless an approved exemption from wearing a face covering has been provided. Requests for exceptions and reasonable accommodations related to face coverings must be initiated by the staff member. All such requests will be handled in accordance with applicable laws and regulations.

#### **Confidentiality and Privacy:**

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.



**Further Information:**

No staff member will be discharged or in any manner discriminated against if an member reports a work-related injury or illness, files an occupational safety or health complaint or otherwise exercises any rights afforded by the OSH Act.

Nothing in this Policy replaces any other COVID-19 safety protocol that OAFc has implemented or may implement in the future.

**References:**

California Dental Association (October 6, 2021). Covid-19 Mandatory Policy Instructions for Employers and Sample Mandatory Vaccination Policy. Retrieved from: <https://www.cda.org/Home/Practice/Back-to-Practice/Preparing-your-Practice/Restarting-Office-Equipment/covid-19-mandatory-policy-Instructions-for-employers-and-sample-mandatory-vaccine-policy>.

Community Care Inc.. COVID-19 Vaccination – MEDICAL/RELIGIOUS OBSERVATION DECLINATION FORM. (K. Carter, Personal Communication, September 21, 2021)

Nova Southeastern University (October 6, 2021). Mandatory Covid-19 Vaccination Policy for Employees. Retrieved from: <https://www.nova.edu/hr/covid19/vaccination/MandatoryPolicyu.html>.

Waukesha Free Clinic. COVID Vaccination Policy for Staff, Students, and Volunteers. (A. Vega, Personal Communication, October 1, 2021).