**Mandatory COVID-19 Vaccine Policy**

**Important Notice:** Catapult does NOT advise mandating vaccines for a variety of reasons. We offer a decision- making tool for companies grappling with how to handle vaccinations. Please review the tool carefully before putting any policy in place.

Reviewed for NC and federal compliance. If using this policy in multiple states, review with legal counsel. For example, Oregon does not permit mandatory vaccines, unless otherwise mandated by state or federal law.

Also, please note that under EEOC guidance employers may mandate vaccination only when a worker poses a “direct threat” to themselves or others by being in the workplace without being immunized. The EEOC advises employers to conduct an individualized assessment of specific factors to determine whether a “direct threat” exists. Additionally, it is currently unclear whether employers can mandate COVID-19 vaccines which have been issued under Emergency Use Authorization. As a result, employers should consult with legal counsel before enacting a mandatory COVID-19 vaccine policy.

**Overview:**

COMPANY NAME is committed to high standard of safety and customer care. We have implemented multiple measures to prevent COVID-19 from spreading within our company and from being transmitted to customers. As an additional measure, COMPANY NAME is mandating COVID-19 vaccines for certain workers to reduce the risk of harm to employee and customer health. This policy is intended to comply with all state and local laws and to be in alignment with guidance from the CDC and EEOC.

**Employees Covered by This Policy:**

Due to the nature of our business (generally it is best to only mandate the vaccine for organizations which have high risk individuals or situations, such as healthcare or congregant living), we are requiring vaccination against COVID-19 for all employees in the following positions/departments to avoid increasing potential risk and harm to the safety and health of our employees and customers.

(Bullet list here – in general any job or department who might present a direct risk to self or others by not being vaccinated. For example, workers who come into close contact with COVID cases might be at high risk themselves; workers that assist elderly or immune compromised might put those patients at risk.)

**Procedures:**

All employees in the above job/department classifications will make an appointment with a healthcare provider to administer any of the approved COVID-19 vaccine alternatives. The vaccine should be administered by or on \_\_\_\_\_\_\_\_\_\_ (date).

Non-exempt (hourly) employees should provide a record to their supervisor of the time that it took them to travel to and from the testing site, as well as the time that it took to wait and have the vaccine administered. Employees will be paid for this time.

In general, there should be not cost to the vaccine. However, the cost (if any) of the vaccine should be submitted to the Accounting Department and will be paid by the organization.

The employee will provide proof of vaccination to the Human Resources Department by \_\_\_\_\_\_\_\_\_ (date), unless a reasonable accommodation is approved. Employee will be careful to not include (or to black out) any medical information other than the employee’s name and confirmation that the vaccine was completed to avoid providing the organization with information on a disabling condition (ADA) or genetic trait (GINA).

If the employee has a qualifying medical condition which would prevent them from safely having the vaccine administered to them, or if they have a religious objection to a vaccine, the employee should contact the Human Resources department by \_\_\_\_\_\_\_\_\_\_ (date).

COMPANY NAME is committed to an interactive and respectful dialogue about individual employee needs and will, at that time, request additional information if needed to substantiate the employee’s ADA condition or religious beliefs and will discuss potential alternatives (reasonable accommodations) to receiving the vaccine. COMPANY NAME is committed to providing reasonable accommodation unless such accommodation is an undue hardship or causes a direct threat to the health or safety of the employee or others in the workplace.

Retaliation for reporting an ADA or religious objection to getting the vaccine is expressly prohibited and should be reported to Human Resources should it occur.

Employees who refuse to take the vaccine without having initiated an ADA or religious accommodation discussion will be placed on unpaid leave. This leave will be evaluated on an ongoing basis. Termination may occur at the point that the company feels the leave is not progressing towards re-instatement.