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11 - M

COVID-19 – Vaccinations (Mandatory) [REVISED 1.13.2022]

Purpose

Our company has adopted a mandatory vaccination policy in order to safeguard the health of all individuals who live and work at our communities, protect those with whom they come into contact, and help reduce community spread of COVID-19.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

Vaccination Requirements

- Team members are required to be fully vaccinated against COVID-19 as a condition of employment with our company.
 - A person is considered fully vaccinated two weeks after receiving a single-dose vaccine (e.g., Johnson & Johnson) or the second dose of a two-dose vaccine (e.g., Pfizer, Moderna, or AstraZeneca).
 - Vaccines must be approved by the U.S. Food and Drug Administration and/or the World Health Organization. Mixing and matching of two-dose vaccines is permissible.
- The vaccine mandate does <u>not</u> apply to team members who work exclusively outdoors or remotely (i.e., in an offsite location where coworkers, customers, vendors, etc. are not present).
 - This includes [Identify any specific job categories (e.g., groundskeepers)].
- Any team member covered by this policy who is not vaccinated by the compliance date [Insert applicable discipline, e.g., unpaid leave, termination].
- Any team member covered by this policy who is only partially vaccinated (i.e., has received one dose of a two-dose vaccine) as of the compliance date [insert applicable policy, e.g., will be placed on unpaid leave].

Reporting Requirements

- Team members will be required to inform our company of their current vaccination status by [notification date.]
 After the information has been collected, team members will be required to submit proof of vaccination by [compliance date].
- Any team member who provides falsified records or false statements regarding their vaccination status will be immediately terminated.
- Our company will handle all vaccination information collected from team members in accordance with applicable laws and policies on confidentiality and privacy.

Exemptions

- On a case-by-case basis, our company may grant exceptions to team members for whom the vaccine is medically contraindicated or for whom medical necessity requires a delay in vaccination.
- Team members may also request a reasonable accommodation on the basis of a disability or sincerely held religious belief, practice, or observance.
 - All requests for reasonable accommodation will be handled in accordance with applicable laws, regulations, and company policies. Refer to [Insert reference to applicable our company policies and procedures].

Any team member who is granted a medical exemption or reasonable accommodation will be required to wear a
face mask and/or undergo regular COVID-19 testing. Refer to COVID-19 - Face-Covering
Requirements and/or COVID-19 - Testing Requirements.

Procedure

Reporting Vaccination Status

- 1. If you are fully vaccinated:
 - a. Follow all steps under Proof of Vaccination below except step 4.
 - b. Submit your vaccination record to HR by [notification date] [Insert method, e.g., via email or through the employee portal].
- 2. If you are not fully vaccinated, draft a statement attesting to your situation.
 - a. Indicate your current status (unvaccinated or partially vaccinated).
 - b. If you are unvaccinated, indicate whether you intend to obtain a vaccine.
 - c. If you are partially vaccinated, note the date of your first dose. If known, provide the date on which you will receive your second dose.
 - d. If you have a future appointment scheduled, provide the appointment confirmation email if available.
 - e. Include the following declaration:
 - "I hereby certify that this statement about my vaccination status is true and accurate."
 - f. Sign and date your statement.
 - g. Submit the statement to HR by [notification date] [Specify method, e.g., via email or the employee portal].

Obtaining a Vaccine

- 1. If you are not yet fully vaccinated:
 - a. Refer to Key Things to Know About COVID-19 Vaccines for the latest information from the CDC.
 - b. Schedule an appointment with a local provider (clinic, pharmacy, etc.) if you have not yet done so.
 - c. Make sure you are scheduled to obtain your final dose at least two weeks prior to our company's compliance date.
 - d. If necessary, request time off as outlined in COVID-19 Time Off for Vaccinations.
- 2. Make sure to obtain an official record from the provider upon receiving your vaccine.
- 3. Keep the record in a secure location so it is not lost.

Submitting Proof of Vaccination

- 1. Gather one of the following acceptable forms of documentation:
 - a. COVID-19 Vaccination Record Card
 - b. Immunization record from a licensed healthcare provider, pharmacy, or public-health information system
 - c. Medical record or other official documentation of the vaccination
- 2. If you lost your record, call the applicable provider (pharmacy, clinic, health department, etc.) to request a new copy.
 - a. If you are unable to obtain the record, contact HR for guidance on providing a sworn statement as an alternative.
- 3. Verify the record includes the following information:
 - a. Your first and last name
 - b. Type of vaccine (Pfizer, Moderna, or Johnson & Johnson)
 - c. Date(s) of administration
 - d. Name of the provider that administered the vaccine
 - This may not be listed on state immunization forms but will not preclude our company from accepting the record.
- 4. Submit a copy of the record to HR by [compliance date] [Specify method, e.g., via email or the employee portal].

Requesting an Exemption or Accommodation

- 1. If you would like to request a medical exemption:
 - a. Obtain a letter from a licensed healthcare provider stating the valid medical reason for the exemption.
 - b. Submit your request in writing to HR.
- 2. If you would like to request a reasonable accommodation, follow the applicable procedure as outlined in [Insert reference to our company's applicable policies and procedures].



11 **-** O

COVID-19 – Vaccinations (Optional) [REVISED 1.13.2022]

Purpose

Our company has adopted an optional vaccination policy to provide team members with choice while helping to safeguard the health of team members, residents, and others who visit our communities.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

- Team members are encouraged, but not required, to be fully vaccinated against COVID-19.
 - A person is considered fully vaccinated two weeks after receiving a single-dose vaccine (e.g., Johnson & Johnson) or the second dose of a two-dose vaccine (e.g., Pfizer, Moderna, or AstraZeneca).
 - As an exception, our company reserves the right to mandate vaccines for certain team members. [Identify any specific groups of team members or job categories]. Such team members will be subject to the provisions of the COVID-19 Vaccination Policy (Mandatory). (Provide this policy if this applies.)
- Team members who are not fully vaccinated must wear face coverings at work at all times and undergo weekly COVID-19 testing.
- Any team member who fails to comply with this policy will be subject to [Insert information on potential discipline (e.g., unpaid leave, termination)].

Reporting Requirements

- All team members, whether vaccinated or not, will be required to inform our company of their vaccination status by [notification date].
- Any team member who provides falsified records or false statements regarding their vaccination status will be immediately terminated and may also be subject to criminal penalties.
- Our company will handle all vaccination information collected from team members in accordance with applicable laws and policies on confidentiality and privacy.

Procedure

If You Are Not Fully Vaccinated

- 1. Refer to Key Things to Know About COVID-19 Vaccines for the latest information from the CDC.
- 2. Consider scheduling an appointment with a local provider (clinic, pharmacy, etc.) if you have not yet done so.
 - a. If necessary, request time off as outlined in COVID-19 Time Off for Vaccinations.
- 3. Follow COVID-19 Face-Covering Requirements and COVID-19 Testing Requirements.

Reporting Status Using a Vaccination Record

- 1. If you are vaccinated, gather your record (i.e., COVID-19 Vaccination Record Card, medical record, or immunization record from a healthcare provider, pharmacy, or public-health information system).
 - a. If you are unable to locate it, call the applicable provider (pharmacy, clinic, health department, etc.) to request a new copy.
 - If unable to obtain one, follow the steps under No Vaccination Record below.
- 2. Verify the record includes the following information:
 - a. Your first and last name
 - b. Type of vaccine (Pfizer, Moderna, or Johnson & Johnson)

- c. Date(s) of administration
- d. Name of the provider that administered the vaccine
 - This may not be listed on state immunization forms but will not preclude our company from accepting the record.
- 3. Make a copy of the record and submit it to HR by [notification date] [Specify method, e.g., via email or the employee portal].
 - a. If you have had only the first of two doses, include a note stating when you are scheduled to receive the second dose.

Reporting Status (No Vaccination Record)

- 1. If you are unvaccinated or have lost your record, draft a statement attesting to your status.
 - a. If you are unvaccinated, indicate whether you intend to obtain a vaccine and when.
 - b. If you are vaccinated but have no record, describe, to best of your recollection, the type of vaccine received, the date(s) of administration, and the name of the provider.
 - c. Include the following declaration:
 - "I hereby certify that this statement about my vaccination status is true and accurate."
- 2. Sign and date your statement.
- 3. Submit your statement to HR by [notification date] [Specify method, e.g., via email or the employee portal].



21

COVID-19 – Time Off for Vaccinations [REVISED 1.13.2022]

Purpose

Our company provides team members with paid time off for vaccinations.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

- A team member may take up to four hours of paid time off (at the regular rate of pay) per vaccine dose in order to travel to the vaccination site, receive a vaccination, and return to work.
 - Our company may allow additional time as needed, but the time will not be paid. Team members can elect to use accrued leave (e.g., sick leave) to cover the additional time.
 - Team members who obtain their vaccinations outside of work time will not be compensated.
 - If a team member spends fewer than four hours getting the vaccine, they will only be compensated for the time used.
- Any team member who is unable to report to work due to side effects may utilize up to two days of sick leave immediately following each dose.
 - If they have no more sick leave available, our company will grant two additional sick days.

Procedure

- 1. If you need time off to get vaccinated or to recover from side effects, follow our company's procedure for requesting time off. Refer to [Insert reference to applicable our company policies and procedures].
- 2. If it takes you more than four hours to get your vaccine, send your supervisor an email explaining the reason.



31

COVID-19 – Employee Notification and Removal from the Workplace [REVISED 1.13.2022]

Purpose

Our company has established policies aimed at preventing team members who contract COVID-19 from transmitting the virus to others in the workplace.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

Notification Requirement

- Team members are required to promptly notify our company if any of the following occurs:
 - They have received a positive test result for COVID-19, whether they are symptomatic or not.
 - They have received a presumptive COVID-19 diagnosis from licensed healthcare provider (e.g., in the event testing is inconclusive).
 - They are experiencing symptoms of COVID-19 but have not yet been diagnosed.
- Upon notification, team members will be required to stay home or leave work (as applicable).
- our company will provide time off from work to team members who are diagnosed with COVID-19 in accordance with [Insert our company's applicable leave policies (e.g., sick leave, Family Medical Leave Act, etc.)].
- our company will not retaliate against any team member for reporting a work-related COVID-19 illness or otherwise exercising their rights under the ETS.

Return-to-Work Requirements

- Team members who have been removed from the workplace following notification will not be allowed to return to work until they provide one of the following:
 - Proof of a negative result on nucleic acid amplification test (NAAT), such as a PCR test
 - A written statement certifying <u>all</u> of the following are true (per the CDC's isolation guidance):
 - At least five days have passed since you tested positive for COVID-19.
 - At least 24 hours have passed with no fever without fever-reducing medication.
 - You have no symptoms, or your symptoms are resolving (except for loss of taste or smell, which may persist for weeks or months).
- Team members who return to work after five days of isolation must continue to wear a mask around others for an additional five days.

Procedure

- 1. If you are diagnosed with COVID-19 or begin experiencing symptoms:
 - a. Immediately notify your supervisor.
 - b. Do not report to work. If you are at work already, promptly leave as directed.
 - c. Self-isolate. Seek care from a medical provider if necessary.
- 2. As you recover and/or wait for new test results, continue to update your supervisor as to your status.
- 3. Before returning to work, submit the required documentation to HR [Insert method, e.g., via email or the employee portal].



41 9 – Testing

COVID-19 – Testing Requirements [REVISED 1.13.2022]

Purpose

In compliance with OSHA's Emergency Temporary Standard (ETS) on Vaccination and Testing (29 CFR 1910.501), Our company has adopted testing requirements to reduce the spread of COVID-19 at our communities.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

Testing Requirements

- Team members covered under this policy will be required to undergo weekly COVID-19 testing.
- As long as a team member is reporting to work in person at least once every seven days, they must be tested once every seven days.
 - Any team member who works exclusively outdoors or remotely (i.e., in an off-site location where coworkers, customers, vendors, etc. are not present) for a period of seven days or more will not be required to submit to testing during that period.
- [Select applicable policy: Team members will be responsible for arranging their own testing <u>or</u> our company will provide on-site testing. (If applicable, list locations.)]
 - Acceptable types of tests include nucleic acid amplification tests (NAATs), such as PCR tests, and antigen tests that are FDA-approved. Antibody tests will not be accepted.
 - If an over-the-counter test is used, it may not be self-administered unless observed by a licensed telehealth proctor or an authorized our company representative.

Documentation Requirements

- Team members who obtain off-site testing must submit documentation of their test results on a weekly basis.
 - Any team member who fails to submit a test result within seven days of their last test will be required to leave the workplace and may not return until they are able to provide a negative test result.
- Our company will handle all testing information collected from team members in accordance with applicable laws and policies on confidentiality and privacy.
- Any team member who provides falsified test results will be subject to immediate termination and possible criminal penalties.
- Team members who are subject to the testing requirement will also be required to wear face coverings while at work unless they are granted a reasonable accommodation. See COVID-19 Face-Covering Requirements.

Exemptions

 Any team member who receives a positive COVID-19 test result, or is diagnosed with COVID-19 by a licensed healthcare provider, will not be required to undergo testing for 90 days following the date of the positive test or diagnosis.

Procedure

If On-Site Testing Is Available

1. Refer to HR for guidance on scheduling, testing hours, etc.

- 2. Report to the designated testing location as instructed.
- 3. [Insert how results are communicated: sent via email, made available through the employee portal, etc.]

If On-Site Testing Is Not Available

- 1. Locate a local clinic, pharmacy, or other COVID-19 testing provider.
- 2. Obtain a test every seven days maximum.
- 3. Submit a copy of each test result to HR no later than the seventh day after the date on which you provided your last test result.
 - a. [Insert method, e.g., via email or employee portal]
- 4. If you will be returning to work after a leave or period of teleworking, get tested no more than seven days prior to your planned return date.
 - a. Try to obtain your test as close to your return date as possible.
- 5. If you will miss a testing deadline for any reason (e.g., personal emergency, no appointments available, etc.), immediately contact HR for guidance.
 - a. Do not report to work if you have missed the deadline.

Positive Test Results

1. If you receive a positive test result, refer to COVID-19 – Employee Notification and Removal from the Workplace.



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COVID-19 – Face-Covering Requirements [REVISED 1.13.2022]

Purpose

In compliance with OSHA's Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501), our company has adopted face-covering requirements to reduce the spread of COVID-19 at our communities.

[Important Note: On Thursday, January 13, 2022, the United States Supreme Court invalidated the Occupational Safety and Health Administration (OSHA) COVID-19 Vaccination and Testing Emergency Temporary Standard (ETS). These policy templates have been updated to remove some of the information specific to the ETS. Although the federal standard has been blocked, remember that your state or local government could have COVID-19-related regulations that may still apply to your company.]

Standard

Requirements

- Except when an exception applies (per below), all team members covered by this policy are required to wear face coverings while indoors at work or when occupying a vehicle with another person for work purposes.
- Acceptable types of face coverings include disposable surgical masks, cloth face coverings (made of two layers of fabric), and gaiters (made of two layers of fabric or folded to make two layers).
 - Fabrics must be tightly woven enough to prevent light from passing through when held up to a light source.
- Plastic face shields are not permitted.
- Face coverings must be secured to the head with ties, ear loops, or elastic bands that go behind the head. They may not have slits, exhalation valves, visible holes, punctures, or other openings.
- Face coverings must cover the nose and mouth.

Exceptions

- Team members are not required to wear face coverings while engaged in any the following activities at work:
 - Working alone in a room with floor-to-ceiling walls and a closed door
 - Eating or drinking (for a limited time)
 - Wearing a respirator (when the use of PPE is required to perform a work task)
- Team members may be required to remove their face coverings for the following purposes:
 - To identify themselves briefly to a law enforcement officer or for other security reasons
 - To perform a specific work task if a supervisor has determined wearing it would create a hazard (For example, it may become entangled with equipment.)

Reasonable Accommodations

- Team members may request a reasonable accommodation if they cannot wear a face covering because of a
 disability or a sincerely held religious belief, practice, or observance.
 - All such requests will be handled in accordance with applicable laws and regulations and as outlined in [insert reference(s) to the company's applicable policies and procedures].

Procedure

- 1. Make sure you purchase face coverings that meet our company's requirements.
- 2. [If our company provides face coverings, state how and where team members can obtain them].
- 3. Wear a face covering at work unless an exception applies.
 - a. Keep it snugly over your nose and mouth.

4. If you would like to request a reasonable accommodation, follow the applicable procedure as outlined reference to our company's applicable policies and procedures].						