

Opportunity Partners' COVID-19 Vaccination, Testing, and Face Covering Policy

Purpose:

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole. Opportunity Partners encourages all employees to receive a COVID-19 vaccination series to protect themselves, the people we serve, coworkers, and the community. However, should an employee choose not to be vaccinated, this policy's sections on testing and face coverings will apply. This policy complies with OSHA's Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501). Because Opportunity Partners employs more than 100 employees, the organization faces penalties up to \$13,653 per violation of the requirements in the ETS, to a maximum fine of \$136,532. In addition, individual employees who knowingly supply false information regarding vaccination or testing may face criminal penalties and fines up to \$10,000.

Scope:

*This COVID-19 Policy on vaccination, testing, and face covering use applies to **all employees** of Opportunity Partners who are in direct contact with others during their workday. This includes face-to-face contact with people receiving services, customers, coworkers, and community members.*

Opportunity Partners encourages all employees to be fully vaccinated. Employees 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 Johnson & Johnson's 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. Employees who are not fully vaccinated will be required to provide proof of weekly COVID-19 testing and wear a face covering continuously while at the workplace.

Certain employees, including current Opportunity Partners employees working under state and federal contracts, are already required to provide proof of full vaccination or submit documentation of weekly COVID-19 test results. These employees will continue their current protocols for vaccination and/or testing.

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their weekly testing results. Employees not in compliance with this policy will be subject to discipline up to and including termination.

Procedures:

Overview and General Information

Vaccination

Any Opportunity Partners employee that chooses to or is required to be vaccinated against COVID-19 must be fully vaccinated no later than January 10, 2022. Any employee not fully vaccinated by January 10, 2022 will be subject to the regular face covering requirements of the policy. In addition, employees not fully vaccinated by February 9, 2022 will also be subject to the weekly testing requirements of this policy.

To be fully vaccinated by February 9, 2022, an employee must:

- Obtain the first dose of a two dose vaccine no later than December 29, 2021 and the second dose no later than January 26, 2022; or*
- Obtain one dose of a single dose vaccine no later than January 26, 2022.*
- While boosters are highly encouraged for those eligible, **boosters are not required to be considered fully vaccinated.***

Employees will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine as stated above. An employee will be considered partially vaccinated if they have received only one dose of a two dose vaccine.

Vaccines are available at no cost in Minnesota. Your medical provider or [MN Vaccine Locator](#) can help you find vaccine options in your area.

Testing and Face Coverings

All employees who are not fully vaccinated as of February 9, 2022 will be required to undergo regular COVID-19 testing, in addition to wearing a face covering when in the workplace. Policies and procedures for testing and face coverings are described in the relevant sections of this policy.

Vaccination Status and Acceptable Forms of Proof of Vaccination

Vaccinated Employees

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status for staff will be submitted via the COVID survey tool in the ADP mobile app. Proof of vaccination status for supported employees of Opportunity Partners (individuals receiving services and paid by OP) will be submitted via email to policy@opportuntites.org, and stored electronically in the MyEvolve case management system. This information will be treated as electronic Protected Health Information (ePHI), and both platforms comply with the privacy requirements of the Health Insurance Portability & Accountability Act (HIPAA).

Acceptable proof of vaccination status is:

- 1. The record of immunization from a health care provider or pharmacy;*
- 2. A copy of the COVID-19 Vaccination Record Card;*
- 3. A copy of medical records documenting the vaccination;*
- 4. A copy of immunization records from a public health, state, or tribal immunization information system; or*
- 5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).*

Proof of vaccination generally should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) that administered the vaccine. Minnesota offers tools to help you locate your vaccine records: [Find My Immunization Record - Minnesota Dept. of Health \(state.mn.us\)](https://state.mn.us)

If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite submitting documentation of attempts to do so (e.g., by trying to contact the vaccine administrator or Minnesota Department of Health), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated); attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof; and including the following language:

"I declare (or certify, verify, or state) that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties."

An employee who attests to their vaccination status in this way should to the best of their recollection, include in their attestation the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine.

All Employees

All employees, both vaccinated and unvaccinated, must inform Opportunity Partners of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

<u>Vaccination Status</u>	<u>Instructions</u>	<u>Deadline(s)</u>
Employees who are fully vaccinated .	Submit proof of vaccination that indicates full vaccination.	January 10, 2022
Employees who are partially vaccinated (i.e., one dose of a two dose vaccine series).	Submit proof of vaccination that indicates when the first dose of vaccination was received by January 10 th , 2022, followed by proof of the second dose when it is obtained.	January 26, 2022
Employees who are not vaccinated and wish to remain unvaccinated	Submit a statement that you are unvaccinated and not planning to receive a vaccination. Staff may submit this statement via the COVID survey tool in the ADP mobile app; supported employees may submit this statement via email to policy@opportunities.org	January 10, 2022

Supporting COVID-19 Vaccination & Testing

An employee may take **up to four hours of paid work time per dose** to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight hours of paid work time for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of paid work time will be granted. Employees who take longer than four hours to get the vaccine must send their supervisor an email documenting the reason for the additional time (e.g., they may need to travel long distances to get the vaccine). Additional time requested will be granted, if reasonable, but will not be paid; in that situation, the employee can elect to use PTO to cover the additional time. If an employee is vaccinated outside of their regular paid work time, they will not be compensated.

Employees may utilize **up to two workdays of sick leave immediately following each dose** if they have side effects from the COVID-19 vaccination that prevent them from working. Employees who have no PTO leave will be granted up to two days of additional PTO leave immediately following each dose if necessary.

Employee Notification of COVID-19 and Removal from the Workplace

Opportunity Partners requires employees to promptly notify their supervisor when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

In accordance with Opportunity Partners' [COVID-19 Preparedness Plan](#), all employees are required to screen themselves for COVID-19 symptoms before beginning work – and notify supervisor and stay home if symptoms are present. If symptoms of illness develop during the workday, all employees must notify their supervisor and quarantine onsite until able to go home.

Medical Removal from the Workplace

Opportunity Partners has also implemented a policy for keeping COVID-19 positive employees from the workplace in certain circumstances. Opportunity Partners will immediately remove an employee from the workplace if they have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider (i.e., immediately send them home or to seek medical care, as appropriate).

Return to Work Criteria

Opportunity Partners will follow the guidance of the Centers for Disease Control (CDC) and MN Department of Health (MDH) regarding return to work following COVID-19 infection. Please refer to Opportunity Partners' [COVID-19 Preparedness Plan](#) for more information.

If an employee has severe COVID-19 or an immune disease, Opportunity Partners will follow the guidance of the employee's licensed healthcare provider regarding return to work.

COVID-19 Testing for employees not fully vaccinated

All employees who are not fully vaccinated will be required to comply with this policy for testing, beginning February 9, 2022.

Employees who report to the workplace or interact directly with others during the course of the workday:

(A) must be tested for COVID-19 at least once every seven days; and

(B) must provide documentation of the most recent COVID-19 test result to their supervisor no later than the seventh day following the date on which the employee last provided a test result.

Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were teleworking for two weeks prior to reporting to the workplace):

(A) must be tested for COVID-19 within seven days prior to returning to the workplace; and

(B) must provide documentation of that test result upon return to the workplace. Staff employees must upload documentation via the ADP Mobile app. Supported employees must email documentation to policy@opportunities.org.

If an employee does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace until they provide a test result.

Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis.

The MN Department of Health offers many resources to help you find low- and no-cost testing: [COVID-19 Testing - Minnesota Dept. of Health \(state.mn.us\)](#)

Face Coverings

Opportunity Partners requires all employees to wear face coverings **over the nose AND mouth** while working and moving about inside buildings, inside a vehicle with another person, and when unable to maintain social distancing. **Face coverings must:** (i) completely cover the nose and mouth; (ii) be made with two or more layers of a breathable fabric that is tightly woven (i.e., fabrics that do not let light pass through when held up to a light source); (iii) be secured to the head with ties, ear loops, or elastic bands that go behind the head. If gaiters are worn, they should have two layers of fabric or be folded to make two layers; (iv) fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and (v) be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.

Acceptable face coverings include clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet these criteria.

*Employees who are not fully vaccinated must wear face coverings **over the nose AND mouth** at all times when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for face coverings are implemented, along with the other provisions required by OSHA's COVID-19 Vaccination and Testing ETS, as part of a multi-layered infection control approach for unvaccinated workers. Cloth and surgical masks meeting these criteria are available free of charge at every Opportunity Partners location.*

The following are exceptions to requirements for face coverings:

- 1. When an employee is alone in a room with floor to ceiling walls and a closed door.*
- 2. For a limited time, while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.*
- 3. When an employee is wearing a respirator or facemask.*
- 4. Where Opportunity Partners has determined that the use of face coverings is infeasible or creates a greater hazard (e.g., when it is important to see the employee's mouth for reasons related to their job duties, when the work requires the use of the employee's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).*

New Hires:

All new employees are required to comply with the vaccination, testing, and face covering requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment.

Newly hired employees are required to bring proof of full vaccination status or a negative COVID-19 test within the last 7 days on their first day of employment orientation.

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. Both ADP and MyEvolve are HIPAA compliant platforms.

Questions:

Please direct any questions regarding policy/procedures affecting staff to hr@opportunities.org.

Please direct any questions regarding policy/procedures affecting supported employees to policy@opportunities.org.