

Employee COVID-19 Vaccination /Screening Policy

I. PURPOSE

The purpose of this policy (“Policy”) is to require all EMU employees to be fully vaccinated against COVID-19 or, alternatively, to undergo weekly COVID-19 testing. In the interest of public health and safety, the University reserves the right to implement safeguards that exceed the minimum requirements that apply under any current or future federal, local, or state mandate.

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. Vaccines are free, safe, and effective. The U.S. Centers for Disease Control has [published](#) helpful details about the benefits, safety, and efficacy of COVID-19 vaccines. EMU supports all efforts by employees to complete a full COVID-19 vaccination series. Employees wishing to avoid the burden of weekly testing under this Policy must [show evidence](#) of receiving [a COVID-19 vaccine](#).

II. SCOPE

A. This Policy is applicable to **all** University employees. As such, the terms of this Policy apply to employees in all employment classes including, but not limited to, non-bargained for staff, employees represented by a bargaining representative, employee consultants, temporary employees, part-time employees, graduate assistants, and student workers.

B. Effective January 10, 2022, all employees are required to be:

(a) fully vaccinated against COVID-19 and [report their vaccination status](#) to the University,

or

(b) undergo weekly COVID-19 testing and [report their weekly test results](#) to the University.

C. Employees who have not [presented evidence](#) to the University that they are fully vaccinated will be presumed to be unvaccinated and required to undergo weekly testing.

D. Employees who are not vaccinated based on medical necessity or a sincerely-held religious belief are required to undergo weekly testing under this Policy and [report their weekly test results](#) to the University if tested at an off site facility. .

III. PROTOCOLS

A. Vaccination

1. Vaccinated employees: Employees who are fully vaccinated and [report their vaccination status](#) to the University are not required to undergo weekly testing as outlined in Section III(B) of this Policy. However, employees may still be required to undergo periodic [evidence-based testing](#), and employees (including those who are fully vaccinated) should also voluntarily test should they exhibit symptoms of COVID-19.

The most effective way to avoid the burden of [weekly](#) testing (outlined in Section III(B) of this Policy) is to [receive a COVID-19 vaccine](#), which is free, safe, and effective. The U.S. Centers for Disease Control has [published](#) helpful details about the benefits, safety, and efficacy of COVID-19 vaccines.

“Fully vaccinated” for the purpose of this Policy is defined as completion of a full vaccination series. Employees are considered fully vaccinated two weeks after completing a primary COVID-19 vaccination or vaccination series. For example, 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. At this time, the definition of fully vaccinated *does not* include a booster shot requirement although this is subject to change as the health and regulatory environment evolves.

2. Paid time off for vaccination: Employees are eligible for up to four (4) hours of paid time off, per dose, to receive their COVID-19 vaccination shot(s) to the extent that the vaccination occurs during the employee’s normal working hours. The maximum amount of allowed paid time off is eight (8) hours for a two dose vaccination series to the extent that doses are administered during the employee’s normal working hours. Employees are encouraged to take advantage of [vaccination opportunities on campus](#).

Employees wishing to utilize up to four (4) hours of paid time off for the specific purpose of receiving a vaccination dose **MUST** do all of the following:

- a. Notify their Supervisor with reasonable advance notice of their planned time off to obtain their vaccination dose;
- b. Appropriately code the paid time off for vaccination purposes on their timesheets utilizing the code VPTO (Vaccine Paid Time Off) ; and
- c. [Submit](#) appropriate proof of vaccination upon completion of their final dose to substantiate the absence and confirm vaccination status.

Unfortunately, this provision is not retroactive; employees who are already fully vaccinated are not eligible for additional paid time off. If an employee spends less time getting the vaccine, only the actual amount of time taken will be allowable as paid time off.

3. Paid time off for vaccination side effects: Employees who experience side effects from a COVID-19 vaccination may utilize up to two workdays of sick leave or other paid time off immediately following each dose if these side effects are of a nature that prevent them from working. Employees who have no sick leave or other paid time off will be granted up to two days of additional sick leave immediately following each dose if necessary. To the extent that an employee is experiencing side effects that may also be symptoms of COVID-19 disease, employees are required to [report](#) those symptoms to the University.

4. Reporting vaccination information to the University: Upon receiving any COVID-19 vaccination shot, employees must promptly [report their vaccination](#) to the University. Acceptable proof of vaccination status is:

- a. The record of immunization from a health care provider or pharmacy;
- b. A copy of the COVID-19 Vaccination Record Card;
- c. A copy of medical records documenting the vaccination;
- d. A copy of immunization records from a public health, state, or tribal immunization information system; or
- e. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare 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 lot number, the date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) that administered the vaccine. In some cases, state immunization records may not include one or more of these data fields, such as clinic site; in those circumstances the University will still accept the state immunization record as acceptable proof of vaccination.

[Employees should follow the instructions](#) for how to upload proof of vaccination into the University's secure records database. Employees who have already registered their vaccination status but have not provided a copy of their vaccination card should [access their online University vaccination record](#) and click on "edit". Once the edit has been selected, the employee should update any information that has changed (e.g. doses or date of last vaccination) and upload a picture of their vaccination card or other acceptable proof of vaccination. Employees who do not submit acceptable proof of vaccination will remain subject to the mandatory weekly testing protocol.

B. Weekly testing

1. Weekly testing for unvaccinated employees: Unless a specific exception applies as set forth in this Policy, employees **must** undergo a weekly COVID-19 test and, if tested off campus, [share their test results](#) with the University **if** they:

- Are not fully vaccinated; or
- Have not [reported their vaccination status](#) to the University.

2. Remote work: Employees otherwise subject to weekly testing may not avoid the testing requirement by seeking to work remotely. University management is responsible for scheduling employees in accordance with University business needs and approved Flexible Work Arrangement/Operational Excellence Plans.

3. On-campus testing: While the University is not required to provide testing for unvaccinated employees, as a convenience to employees, free rapid COVID-19 testing is available at EMU's [on-campus testing center](#) (pre-registration is required). Employees who are subject to the weekly testing protocol who receive their weekly COVID-19 test at the on-campus testing center are not required to provide the University with any additional information about that test.

4. Off-campus testing: If an employee who is subject to the testing protocol opts to obtain an approved COVID-19 test off campus and at their own expense, the employee is responsible for submitting the results to the [University's secure database](#). Failure to adhere to the requirement to submit results in a timely manner will result in removal from the workplace and may subject the employee to disciplinary action. Employees who fail to submit documentation of testing results, and who are therefore not permitted to work, will be required to utilize paid time off, if available; otherwise the time missed will be unpaid.

5. Exceptions to weekly testing requirement: The only exceptions to the mandatory testing protocol for employees who are not fully vaccinated are as follows:

a. 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 applicability of this exception must be approved by Telehealth based on proof of prior positivity or diagnosis.

b. An employee who is on a leave of absence approved by University Human Resources for at least five or more consecutive work days within a single work week is not required to undergo COVID-19 testing during any such week.

c. A faculty member who is on approved sabbatical or instructors who are not actively working during semester breaks that are in excess of seven (7) days are not required to undergo COVID-19 testing.

d. An instructor who was specifically contracted to teach 100% online courses and whose residence is 75 miles or more from EMU's main campus in Ypsilanti, MI. For this exception to apply, the appropriate language must be in the instructor's assignment letter and/or otherwise approved by the Provost's Office.

e. An employee who is otherwise absent (e.g for pre-approved vacation), and where such absence(s) encompass a full five-day work week, is not required to undergo COVID-19 testing during that week.

Unvaccinated employees returning to campus under the aforementioned provisions, including those returning from vacation, must receive and report to the University a negative COVID-19 test within seven (7) days of their scheduled return to work date. Failure to adhere to this requirement will result in removal from the workplace and may subject the employee to disciplinary action. *Additional exceptions must be approved by the University's Chief Human Resources Officer.*

C. Positive Cases of COVID-19

1. Reporting positive cases of COVID-19: All employees, regardless of vaccination status, are required to immediately [notify](#) the University if any of the following occur:

a. the employee receives a positive COVID-19 test or is diagnosed with COVID-19;

- b. the employee is notified that they were in close contact with another person who was medically diagnosed or tested positive for COVID-19;
- c. the employee has any symptoms of COVID-19; or
- d. the employee has learned that an EMU community member (student or employee) has tested positive or has been diagnosed with COVID-19. The University may require additional reporting as part of its close contacts assessment.

2. Time away from work:

a. Employees who have symptoms of COVID-19, have tested positive for COVID-19, or been diagnosed with COVID-19, must notify their supervisor that they are ill, make arrangements to return home as soon as possible (if they are on campus), and avoid contact with other individuals.

b. Employees who work in positions that are amenable to remote work arrangements and who feel well enough to work remotely may, at the discretion of their supervisor, telework from home if they have tested positive or are diagnosed with COVID-19. Employees who are ill, or who are otherwise unable to perform their job duties from home must utilize available paid time off as outlined in subsection (c) below.

c. Most of EMU's workforce has access to paid sick time as outlined in Board Policy 3.2.5 (for non-bargained for employees) and the collective bargaining agreements (for employees in a collective bargaining unit).

d. Employees will not be disciplined for any time off that is required to be taken due to a positive COVID-19 test result or diagnosis. Employees are, however, expected to continue to judiciously manage their attendance and sick leave time, and the University will continue to enforce work rules related to the abuse of such time.

e. Employees suffering from serious illness may be eligible for a leave of absence under the [Family and Medical Leave Act](#).

3. Returning to Work:

a. In the spirit of maintaining a safe campus community, the University must take steps to ensure that employees who test positive for or are diagnosed with COVID-19 remain out of the physical workplace.

b. Employees who have tested positive for or have been diagnosed with COVID-19 may not return to work on campus until cleared by University

- Telehealth. University Telehealth's standard for return to work will be in accordance with applicable health department directives and recommendations.
- c. Employees must be cleared by the University's [Telehealth Clinic](#) before returning to campus as they will not otherwise be able to clear the [COVID PASS daily screening requirement](#).
 - d. Additionally, employees must follow departmental protocol and/or applicable work rules related to notifying their direct Supervisor of any necessary time off from work
 - e. If an employee has severe COVID-19 or an immune disease, the University will follow the guidance of a licensed healthcare provider regarding return to work.

D. Non-Discrimination: EMU will not discriminate against any employee in the application of this Policy and will not tolerate any form of retaliation towards any employee with respect to the requirements of this Policy. Concerns regarding discrimination or retaliation should be reported to University [Human Resources](#).

E. Compliance

1. Employees who fail to comply with this Policy will be subject to disciplinary action pursuant to University policies and/or the employee's collective bargaining agreement.
2. An employee who is not fully vaccinated or has not reported to the University that they are fully vaccinated violates this policy if they fail to undergo weekly testing for COVID-19 and report the results of all such testing to the University. Employees who are required to test either weekly or through the University's periodic [evidence-based testing program](#) are strongly encouraged to use the University's [on-campus testing center](#).
3. Employees who submit information to the University that is knowingly false or fraudulent may be subject to disciplinary action (up to and including termination) and criminal [penalties](#).
4. All new employees are required to comply with the vaccination, testing, and University face covering requirements (see below) 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. New hires will be required to [submit proof of full vaccination](#) on or before their first day of employment. In the event that proof of vaccination is not received prior to the employee's first day of on campus work, the new employee will be placed into the mandatory testing regimen and must provide [proof of a negative COVID test](#)

that had been completed within seven (7) days of their first day of working on campus. New hires may not work remotely to avoid this requirement.

F. 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.

G. Application of Other Policies

1. Indoor face masks: With few exceptions employees are [required to wear a face mask](#) while indoors (regardless of vaccination status).
2. Daily health screening: All employees must continue to complete the [COVID PASS](#) daily health screening, regardless of vaccination status, on any day they come to campus for any reason.
3. Compliance: Employees who do not comply with policies or work rules, including but not limited to, those relating to workplace health and safety, may be subject to disciplinary action.