

## The Roman Catholic Church of the Archdiocese of New Orleans Mandatory Vaccination 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. The Roman Catholic Church of the Archdiocese of New Orleans (the “Archdiocese”) has adopted this policy on mandatory vaccination to safeguard the health of the Archdiocese’s Staff members from the hazard of COVID-19. This policy is in compliance *with OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501)*.

**Scope:**

This Mandatory COVID-19 Vaccination Policy applies to all staff members of the Archdiocese (full-time and part-time), and all volunteers and contract workers (“Staff”).

All Staff covered by this policy is required to be fully vaccinated as a term and condition of employment at the Archdiocese. Staff is 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. All Staff is required to report their vaccination status and to provide proof of vaccination to human resources. Staff must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results.

Staff not in compliance with this policy will be placed on administrative leave without pay or terminated, at the discretion of the Archdiocese. Volunteers and contract workers not in compliance with this policy will be prohibited from working at the Archdiocese.

Staff may request an accommodation or exception from this mandatory vaccination policy if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Staff also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face-covering conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by contacting Human Resources. All such requests will be handled in accordance with applicable laws and regulations and the Archdiocese’s employee handbook.

## **Procedures:**

### **Overview and General Information**

All the Archdiocese Staff must be fully vaccinated no later than February 23, 2022.

To be fully vaccinated by February 23, 2022, staff must:

- Obtain the first dose of a two-dose vaccine no later than January 10, 2022; and the second dose no later than February 9, 2022; or
- Obtain one dose of a single dose vaccine no later than January 10, 2022.

Staff will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine. Staff will be considered partially vaccinated if they have received only one dose of a two-dose vaccine, or if the two-week period has not yet elapsed following the completion of a vaccine series.

Unvaccinated Staff should contact their medical provider to schedule their vaccination appointments.

This policy will be maintained and implemented by the Archdiocese's human resources department. Any questions about the policy should be directed to human resources.

### **Vaccination Status and Acceptable Forms of Proof of Vaccination**

All vaccinated staff are required to provide proof of COVID-19 vaccination, regardless of where they received a vaccination. Proof of vaccination status must be submitted in person to the human resources office of the Archdiocese.

Acceptable proof of vaccination status is:

1. The record of immunization from a healthcare provider or pharmacy;
2. A copy of the CDC COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination; or
4. A copy of immunization records from a public health, state, or tribal immunization information system.

Proof of vaccination generally should include the Staff member's name, the type of vaccine administered, 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 sites; in those circumstances, the Archdiocese may still accept the state immunization record as acceptable proof of vaccination.

All staff must inform the Archdiocese of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

<b>Vaccination Status</b>	<b>Instructions</b>	<b>Deadline</b>
Staff who are fully vaccinated.	Submit proof of vaccination that indicates full vaccination.	January 10, 2022
Staff 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, followed by proof of the second dose when it is obtained.	January 10, 2022
<i>Staff who have not yet been vaccinated.</i>	<i>Submit a statement that you are unvaccinated.</i>	<i>January 10, 2022</i>
Staff who receive a second dose after January 10, 2022	Submit proof of vaccination that indicates full vaccination	February 9, 2022

**Supporting COVID-19 Vaccination**

Staff may take up to four hours of duty 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 duty time for Staff receiving two doses. If a staff member spends less time getting the vaccine, only the necessary amount of duty time will be granted. Staff 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). Any additional time requested will be granted, if reasonable, but will not be paid; in that situation, staff can elect to use accrued leave, e.g., sick leave, to cover the additional time. Staff who is vaccinated outside their approved duty time will not be compensated.

Staff 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. Staff who have no sick leave will be granted up to two days of additional sick leave immediately following each dose if necessary.

The following procedures apply for requesting and granting duty time to obtain the COVID-19 vaccine or sick leave to recover from side effects:

Staff must request approval for leave for a scheduled COVID-19 vaccine from human resources at least forty-eight hours prior to the scheduled vaccination appointment. Human resources may deny such requests and require staff to reschedule the appointment if the scheduled time or place is unreasonable or if it otherwise places an undue burden upon workflow and/or other staff.

**Staff Notification of COVID-19 and Removal from the Workplace**

The Archdiocese will require Staff to promptly notify their supervisor and human resources when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

Medical Removal from the Workplace

The Archdiocese has also implemented a policy for keeping COVID-19 positive Staff from the workplace in certain circumstances. The Archdiocese will immediately remove Staff 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).

The Archdiocese's employee policies for medical absences shall apply to any absences as a result of positive COVID-19 tests and COVID-19 diagnoses.

#### Return to Work Criteria

For any Staff removed because they are COVID-19 positive, the Archdiocese will keep them removed from the workplace until the Staff member receives a negative result on a COVID-19 nucleic acid amplification test (NAAT) following a positive result on a COVID-19 antigen test if the Staff member chooses to seek a NAAT test for confirmatory testing; meets the return to work criteria in CDC's "Isolation Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.

If Staff has severe COVID-19 or an immune disease, the Archdiocese will follow the guidance of a licensed healthcare provider regarding return to work.

#### **Accommodations**

Requests for exemptions or accommodations must be initiated by contacting Human Resources and requesting an exemption or accommodation. Staff requesting an accommodation or exemption will be provided the appropriate exemption or accommodation request form. Staff should complete the form and return the completed form to Human Resources on or before January 10, 2022. All such requests will be handled in accordance with applicable laws and regulations. Human Resources will review and process the request for exemptions or accommodations. The Archdiocese reserves the right to request additional information if needed in the review of these exemption and accommodation requests.

#### **COVID-19 Testing**

If a Staff member covered by this policy is not fully vaccinated due to an approved accommodation or exemption, the Staff member will be required to comply with this policy for testing.

Staff who report to the workplace at least once every seven days:

- (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 Human Resources no later than the seventh day following the date on which the Staff member last provided a test result.

Any Staff member who is not fully vaccinated due to an approved accommodation or exemption and 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 to Human Resources upon return to the workplace.

If a Staff member 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.

Staff who are not fully vaccinated due to an approved accommodation or exemption are responsible for obtaining their testing at their own expense.

### **Face Coverings**

If a Staff member covered by this policy is not fully vaccinated due to an approved accommodation or exemption, the Archdiocese will require the Staff member to wear a face covering. 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 and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker's mouth or facial expressions to understand speech or sign language respectively. Face coverings in any the Archdiocese facility that provides medical treatment or care shall comply with the applicable standards for medical personal protective equipment.

Staff who are not fully vaccinated due to an approved accommodation or exemption must wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Staff who are not fully vaccinated are responsible for providing their own approved masks.

The following are exceptions to the Archdiocese's requirements for face coverings:

1. When a Staff member is alone in a room with floor to ceiling walls and a closed door.
2. For a limited time, while a Staff member is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements.

### **New Hires:**

All new Staff are required to comply with the vaccination 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. All new Staff must submit proof of COVID-19 vaccination on or before the first day of employment.

### **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.