

Mandatory COVID-19 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. University Pharmacy Resident Services, Inc. (hereafter referred to as “UPRS”) has adopted this policy on mandatory COVID-19 vaccination to safeguard the health of our employees from the hazard of COVID-19. This policy also reflects the policies of the sites at which our employees practice and to which compliance is expected. This policy complies with OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).

Scope:

This Mandatory COVID-19 Vaccination Policy applies to all employees of UPRS, regardless of practice site.

All employees covered by this policy are required to be fully vaccinated with an FDA- or WHO-authorized/approved COVID-19 vaccine as a term and condition of employment at UPRS. More information about criteria for full vaccination and acceptable vaccines can be found on the CDC and WHO websites: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html> and <https://covid19.trackvaccines.org/agency/who/>. **All employees are required to report their vaccination status and to provide proof of full vaccination within 30 days of their offer of employment (i.e. date of residency match or date of fellowship offer).** Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees not in compliance with this policy are subject to termination or revocation of their employment offer.

Employees may request an exception from this mandatory vaccination policy if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may request a reasonable accommodation if they cannot be vaccinated because of a disability, or if the provisions in this policy for vaccination conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated within 7 days of offer of employment. All such requests will be handled in accordance with applicable laws and regulations, including practice site policies, and may not place undue hardship on the employer or practice site.

Procedures:

Overview and General Information

All UPRS employees must provide proof of receiving a full, primary vaccination series within 30 days of offer of employment. All employees must be fully vaccinated before their planned start date, as defined

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by the CDC: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>. An employee will be unable to start working until they are fully vaccinated.

Vaccination Status and Acceptable Forms of Proof of Vaccination

All employees must inform UPRS of their vaccination status.

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted via email to Mary Kruszynski (mek5@buffalo.edu). Employees may also be required to submit proof of vaccination to human resources or compliance departments at their practice sites.

Acceptable proof of vaccination status is:

1. The record of immunization from a healthcare provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination(s);
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. An electronic (eg. Excelsior Pass or photograph of a document) or paper 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 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 UPRS will still accept the state immunization record as acceptable proof of vaccination.

Supporting COVID-19 Vaccination

Although employees must be fully vaccinated prior to their start date, UPRS supports ongoing vaccination efforts such as booster doses. If an employee elects to receive a booster, they may take up to four hours of duty time per dose to travel to the vaccination site, receive a vaccination, and return to work. If an employee is vaccinated outside of their approved duty 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 sick leave will be granted up to two days of additional sick leave immediately following each dose if necessary.

Please see UPRS Employee Benefit and Leave policy and the applicable handbook and site policies for requesting time off for these purposes.

Confidentiality and Privacy:

All medical information collected from individuals, including vaccination information, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

Questions:

Please direct any questions regarding this policy to Erin Slazak (emsabia@buffalo.edu) or Mary Kruszynski (mek5@buffalo.edu).