

# COVID-19 Vaccination and Testing Policy

## Purpose

This policy has been developed in order to comply with the OSHA COVID-19 Emergency Temporary Standard (ETS) on Vaccination and Testing (29 CFR 1910.501). The ETS establishes binding requirements on all private employers with 100 or more employees. In accordance with Millsaps College's duty to comply with government laws and regulations and maintain a workplace that is safe and healthy, we are adopting this policy to safeguard the health of our employees and their families; our students; visitors to campus; and the community at large from infectious diseases, such as COVID-19, that may be reduced by vaccinations.

We strongly recommend that all employees receive the COVID-19 vaccine, and booster as appropriate, to help safeguard the health and wellbeing of our community. However, if an employee is not vaccinated, this policy's sections on testing and face coverings will apply. Regardless of vaccination status, all employees must also comply with the most recent COVID-19 Employee Guidelines ([link to EE guidelines on website](#)). In addition to those guidelines, this policy outlines weekly testing requirement and face covering requirements for unvaccinated employee.

## Scope

This COVID-19 policy on vaccination, testing, and face covering use applies to all employees of Millsaps, including student workers, except for employees who: (1) telework from home, or do not report to a workplace where other individuals are present; or (2) work exclusively outdoors.

## Definitions

An employee will be considered **fully vaccinated** two weeks after receiving the second dose in a two dose COVID-19 vaccine series or two weeks after receiving a single dose COVID-19 vaccine.

An employee will be considered **partially vaccinated** if they have received only one dose of a two-dose vaccine, or if less than two weeks has passed since receiving their final dose of the COVID-19 vaccine.

Any employee who has not received the COVID-19 vaccine or who has not provided acceptable proof of vaccination will be considered **unvaccinated**.

## Vaccination Requirements

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Vaccination status must be provided to Human Resources.

### Providing Proof of Vaccination

Fully vaccinated employees must provide written proof of vaccination by submitting one of the following documents to Human Resources at [humanresources@millsaps.edu](mailto:humanresources@millsaps.edu):

- The record of immunization from a health care provider or pharmacy;
- A copy of the COVID-19 Vaccination Record Card;

- A copy of medical records documenting the vaccination;
- A copy of immunization records from a public health, state, or tribal immunization information system; or
- 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 must 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.

An employee who does not possess their COVID-19 vaccination record (e.g., because it was lost or stolen) should contact their vaccination provider (e.g., local pharmacy, physician's office) to obtain a new copy or utilize their state health department's immunization information system.

#### Getting Vaccinated

Employees wishing to obtain a COVID-19 vaccine should visit [Vaccines.gov](https://www.vaccines.gov) to find an appropriate provider nearby. If the option to receive a vaccine on campus becomes available, the availability of on-campus vaccinations will be announced by the Human Resources department.

COVID-19 vaccinations are free, whether an individual has health insurance or not.

#### Time-off for Vaccination

Any employee wishing to be vaccinated against COVID-19 or obtain a COVID-19 booster will be provided with paid time off to be vaccinated. For off-site vaccinations, employees are to work with their managers to schedule appropriate time to comply with this policy. An employee may take up to four hours of paid 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 time for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of paid 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). Any additional time requested will be granted, if reasonable, but will not be paid; in that situation, the employee can elect to use accrued leave, e.g. sick leave or vacation, to cover the additional time. If an employee is vaccinated outside of their regular 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 sick leave will be granted up to two days of additional sick leave immediately following each dose if necessary.

Any employee wishing to use regular work time to be vaccinated or recover from vaccine side effects must notify their immediate supervisor and Human Resources in advance in writing. Time off must be approved by the supervisor in advance, in accordance with our regular time off policy.

### Testing Requirements for Unvaccinated Employees

Employees who are not fully vaccinated, or who are unable to provide proof of vaccination, must provide proof of weekly COVID-19 testing *and* wear a face covering at the workplace. Initial test results must be submitted to Human Resources for review in advance of the February 9, 2022 deadline and must be submitted every 7 days following the initial submission of results.

Employees 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 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 to Human Resources upon return to the workplace.

### *Acceptable tests*

In accordance with the OSHA standards, tests cannot be self-administered and self-read unless observed by the employer or an authorized telehealth provider. Generally speaking, this means that a home test cannot be utilized to clear an employee to be on campus.

Employees are responsible for obtaining and paying for any COVID-19 test needed to clear them for work. Employees can visit the [Mississippi Department of Health website](#) to find a list of local testing locations. If the option to be tested on campus becomes available, Human Resources will notify employees.

### *Failure to Test or Provide Timely Test Results*

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. Proof of positive test must be provided to Human Resources.

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

### Face Coverings

Appropriate use of a face mask is critical in minimizing risks to others near you. You could spread COVID-19 to others even if you do not feel sick. All employees, regardless of vaccination status, must comply with Millsaps policy and local regulations regarding the use of face coverings. If the College's policy does not include wearing a face mask indoors, unvaccinated employees will still be required to wear a mask when indoors and while in a vehicle with another person for work purposes. If you work in

an office and are the only person in the room, you are not required to wear a mask while in your office. If more than one person is in a room, masks should be worn at all times.

Face coverings must:

- completely cover the nose and mouth;
- 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);
- 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;
- fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and
- be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.

CDC does not recommend using face shields or goggles as a substitute for masks. Refer to the [CDC Mask Guidelines](#) for more information. Any employee requesting a medical accommodation should contact Human Resources by email at [humanresources@millsaps.edu](mailto:humanresources@millsaps.edu).

### **Employee Notification of COVID-19 and Removal from the Workplace**

#### *Reporting COVID-19 Symptoms and Positive COVID-19 Diagnosis*

Employees must promptly notify Millsaps College when they have been exposed to COVID-19, are experiencing COVID-19 symptoms, have tested positive for COVID-19, or have been diagnosed with COVID-19 by a licensed healthcare provider. Notification should be made by completing the [Faculty and Staff Reporting Form](#) on the Millsaps College website. Student workers should submit the [Student Reporting Form](#) on the Millsaps College website. Employees must also contact their direct supervisor to notify them of their absence from work.

Any employee who receives a positive COVID-19 test or is diagnosed with COVID-19 by a licensed healthcare provider must immediately leave the workplace, regardless of their vaccination status, and must remain away from the workplace until return to work criteria are met.

The Human Resources team will review all form submissions and confirm the return to work date and criteria based on information the employee has provided. Employees who are feeling well may be approved to work from home for part or all of the time they are isolated, depending on their specific position and workload. The employee's direct supervisor, with assistance from the Human Resources director, will confirm whether a remote work accommodation can be provided. For student workers, the Student Life team will review and respond to all form submission. In most cases, student workers will not be permitted to work from home during quarantine or isolation.

Any employee who must quarantine or isolate due to COVID-19 must follow the Faculty/Staff COVID-19 Health Decision Tree and the return to work criteria confirmed by Human Resources.

### **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. Human Resources will coordinate with new employees prior to their start date.

### **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.

### **Questions**

Please direct any questions regarding this policy to the Human Resources department at [humanresources@millsaps.edu](mailto:humanresources@millsaps.edu).

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