


<b>Category:</b>	Workplace	<b>INCA Community Services Personnel Policy</b>  
<b>Sub Category:</b>	Health and Safety	
<b>Effective Date:</b>	12//2021	
<b>Revised Date:</b>		
<b>Forms:</b>	Reasonable Accommodation Form: Medical or Religious Exemptions	
<b>Responsible:</b>	Human Resource Manager, Program Directors, Supervisors, Executive Director	

## Head Start Mandatory Vaccination Policy

### Purpose

On September 9, 2021 President Biden issued an Executive Order requiring COVID-19 vaccinations for all federal employees, contractors, and others. INCA Community Services is the direct grantee of a Federal Head Start which was included in the federal mandate to require vaccination.

This Mandatory Vaccination Policy requires all employees directly or indirectly through the Head Start program to be fully vaccinated against COVID-19. This policy does not offer employees the option to undergo weekly COVID-19 testing and masking in lieu of getting vaccinated, except as part of a reasonable accommodation for individuals who cannot be vaccinated because of a medical contraindication to COVID-19 vaccines, a medical necessity that requires a delay in vaccination, disabilities under the Americans with Disabilities Act (ADA), sincerely held religious beliefs under Title VII of the Civil Rights Act of 1964 (Title VII), as well as protection under the Pregnancy Discrimination Act (PDA) and other applicable federal and state anti-discrimination laws.

### Policy

In accordance with INCA Community Services, Inc.'s duty to provide and maintain a workplace that is free of known hazards, this policy is adopted to safeguard the health of our employees and their families; our customers and visitors; and the community at large from COVID-19, that may be reduced by vaccinations. INCA Community Services has adopted this policy on mandatory vaccination for Head Start employees to comply with the Federal Government's Emergency Temporary Standard (ETS) on Vaccinations.

This policy will comply with all applicable laws and is based on guidance from the federal and state government, the Centers for Disease Control and Prevention, OSHA, and local health authorities, as applicable.

**Head Start Program Mandatory Vaccination Mandate** (waiting on court decision, it is stayed in the state of Oklahoma)

All employees who are employed directly or indirectly through the Head Start program must be fully vaccinated by January 31, 2022, unless a reasonable accommodation is approved. All covered individuals will be considered fully vaccinated two weeks after receiving the requisite

number of doses of a COVID-19 vaccine. An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.
<b>Face Covering Requirements</b>
See INCA's personnel policy - COVID 19 Vaccination, Masking Policy
<b>Vaccination Status and Acceptable Forms of Proof of Vaccination</b>
See INCA's personnel policy - COVID 19 Vaccination, Testing, and Masking Policy
<b>Accommodations for Medical or Religious Exemptions</b> ( (waiting on court decision, it is stayed in the state of Oklahoma)
<p>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 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 conflicts with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by submitting a medical or religious exemption request form to the Human Resource Department.</p> <p>All such requests will be handled in accordance with INCA's policies and procedures, emergency temporary, the federal ETS, and other other applicable laws and regulations.</p>
<b>COVID-19 Testing as part of seeking accommodations</b>
<p>Unvaccinated Head Start employees who receive an exception from this mandatory vaccination policy for sincerely held religious beliefs or medical reasons will be required to comply with this policy for testing. Covered individuals who report to the workplace at least once every seven days:</p> <ul style="list-style-type: none"> <li>• Must be tested for COVID-19 within seven days; and</li> <li>• Must provide documentation of that test results to the human resource department upon return to the workplace.</li> <li>• If an Employee does not provide documentation of COVID-19 test results as required by this policy, they will be removed from the workplace until they provide a test result.</li> <li>• An Employee subject to these testing requirements may not self-administer and self-read their test unless observed by a representative of INCA or an authorized telehealth proctor.</li> <li>• An antibody test does not satisfy the requirement of this section.</li> <li>• 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.</li> <li>• Testing may be conducted by employees independently scheduling tests at point of care locations. INCA human resource department will assist in finding testing locations.</li> </ul>
<b>Dissemination of Policy</b>
The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.