


Category:	Workplace	INCA Community Services Personnel Policy 
Sub Category:	Health and Safety	
Effective Date:	12/1/2021	
Revised Date:	06/2022	
Forms:		
Responsible:	Human Resource Manager, Program Directors, Supervisors, Executive Director	

COVID-19 Vaccination and Face Covering 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 vaccinations.

(As of November 19, 2021 no ruling concerning vaccine mandate has been issued by the Office of Head Start)

The ETS also indicated OSHA will develop a rule that will require all employers with 100 or more employees to ensure the workforce is fully vaccinated or require any worker who remains unvaccinated to produce a negative test result on at least a weekly basis before coming to work.

As of November 4, 2021 OSHA has implemented an Emergency Temporary Standard to implement this requirement. This policy is a reflection of these mandates and shall be enforced, abided by, and understood by all staff of INCA Community Services, Inc.

On November 16, 2021 it was suspended upon litigation pending. OSHA will resume implementation and enforcement of the ETS following litigation if permitted.

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 the infectious disease COVID-19, that may be reduced by 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.

See Head Start Program Mandatory Vaccination Policy

Face Covering

INCA requires all employees to comply with the face covering requirements as they are mandated by federal, state, and local laws. At this time INCA Community Services work locations are not in areas identified as substantial or high transmission communities, fully vaccinated

employees are not required to wear a mask or remain 6 feet apart from others while working at this time. Proof of vaccination will be required, as allowed by the Equal Employment Opportunity Commission, with details on that process to follow. We will monitor updates on community transmission rates for each location and update these guidelines as necessary. Employees working on-site who are not fully vaccinated or remain unvaccinated are required to wear a mask when maintaining social distance is not possible while at work.

Safety Procedures In Effect

- Practice social distancing - by avoiding large gatherings and maintaining a distance of six feet from others when possible.
- All barriers and partitions should remain in place to protect face and mucous membranes from respiratory droplets that may be produced from a sneeze, cough, talk or breath.
- Wash your hands frequently. Key times for employees to clean their hands include:
 - Before and after work shifts
 - Before and after work breaks
 - After blowing their nose, coughing or sneezing
 - After using the restroom
 - Before eating or preparing food
 - After putting on, touching or removing cloth face coverings
- Practice routine cleaning and disinfection of frequently touched objects and surfaces such as workstations, keyboard, telephones, handrails and doorknobs.
- Avoid using other employees' phones, desks, offices or other work tools and equipment, when possible. Clean and disinfect them before and after us.

Utilization of the CDC's [Covid-19 Community Levels](#) should be used in determining additional safety measures.

Vaccination Status (Compliance with 29 CFR 1910.501(e))

All employees must provide INCA Community Services documentation of their vaccination. Individuals shall also provide INCA with documentation of any changes in their vaccination status (e.g., when they become fully vaccinated after being partially vaccinated).

Any individuals who fail to inform INCA of their vaccination status will be considered unvaccinated for purposes of this policy.

Individuals must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results.

All vaccinated individuals are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted in person at the HR office or by electronic communication.

Acceptable Proof of Vaccination Status

- 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 healthcare professional(s) or clinic site(s)

<p>administering the vaccine(s).</p> <p>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 INCA will still accept the state immunization record as acceptable proof of vaccination.</p>
<p>Supporting COVID-19 Vaccination</p>
<p>Employees may take up to four hours of paid time and the Employee's regular rate of pay per vaccination dose to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight or paid for Employees receiving two does. 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 notify INCA's human resource manager and document 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 sick leave to cover the additional time.</p> <p>Employees will follow INCA's sick leave policies and procedures to request and obtain approval for time off under this section.</p>
<p>New Hires</p>
<p>All new employees 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. New hires must:</p> <ul style="list-style-type: none"> • Provide acceptable proof of vaccinations; • If not fully vaccinated provide a timeline to HR of completion of vaccination and follow testing and masking guidelines until fully vaccinated; • If not fully vaccinated and employed through Head Start employees must submit to weekly testing. • If requesting a medical or religious exemption, submit a completed application with documentation. Exemption may or maynot be given. If not, the employee has not met the condition of employment. If exemption is given, will follow testing and masking guidelines for unvaccinated employees.
<p>Confidentiality and Policy</p>
<p>All medical information collected from individuals, including vaccination information, test results, and other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.</p>
<p>Record Requests</p>
<p>By the end of the next business day after a request, INCA shall make available, for examination and copying, an individual Employee's vaccination and testing records to that employee or to anyone having the written authorized consent of that employee. By the end of the next business day after a request by an Employee or an employee representative, INCA shall make available</p>

the aggregate number of fully vaccinated employees at a workplace along with the total number of employees at the workplace. Employee requests for these records should be directed to the Human Resource Department.

Dissemination of Policy

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.