

Mandatory Employee COVID-19 Vaccination Policy

In the era of the COVID-19 pandemic, the Jewish Association on Aging (JAA) wants to assure you of its continued commitment to maintaining a safe and healthy workplace. We are taking measures to protect you, your coworkers, your families, our residents, and their families from contracting and spreading COVID-19.

Now that the COMIRNATY/Pfizer-BioNTech vaccine has been granted full approval by the US Food and Drug Administration (FDA) and is readily available to the general public, we are implementing a mandatory vaccination policy, subject to the exceptions in this policy (explained below).

This policy is based on guidance from the Centers for Disease Control and Prevention (CDC), the U.S. Equal Employment Opportunity Commission, the Pennsylvania Department of Health, and the Occupational Safety and Health Administration (OSHA) and is designed to comply with all applicable federal, state, and local laws.

Please read this policy carefully.

Continued Applicability of Other Infection Control Policies and Protocols

This Mandatory Vaccination Policy is a key part of our continued overall strategy and commitment to maintaining a safe and healthy workplace in light of the COVID-19 pandemic. This policy is designed for use together with, and not as a substitute for, other COVID-19 prevention measures, including JAA's:

- Face Mask Policy;
- Social Distancing Policy;
- Temperature Check and Health Screening Protocols;
- Cleaning and Sanitation Policy;
- Health and Safety Policy;
- Infection Prevention and Control Policy; and any other applicable protocols.

We need your full cooperation and compliance with this and other health and safety workplace policies to make them effective.

Vaccination Requirements

Consistent with the CDC's guidance and other applicable public health guidance, to prevent the infection and spread of COVID-19, and as an integral part of its public health and safety measures, JAA requires that **all** employees and individuals entering the workplace, including temporary workers and independent contractors, get fully vaccinated against COVID-19 and show proof of receiving an FDA-approved COVID-19 vaccine or a COVID-19 vaccine granted

Emergency Use Authorization by the FDA by November 16, 2021 unless an accommodation or exemption from this policy has been granted. For more information on the accommodation and exemption process, see Accommodation and Exemption Requests below.

Employees who fail to comply with these requirements will be barred from entering their worksite, subject to reasonable accommodation or other requirements of applicable federal, state, and local law.

New employees will be informed of the COVID-19 vaccination requirement prior to an interview and will be required to be fully vaccinated and show written proof of their vaccination or receive an approved medical or religious exemption prior to their first day of work.

Vaccine Administration

You are responsible for scheduling and obtaining all recommended doses (including boosters) of an FDA-approved COVID-19 vaccine or a COVID-19 vaccine granted Emergency Use Authorization by the FDA.

JAA follows the requirements of the City of Pittsburgh's COVID-19 Emergency Sick Leave Act, which provides paid time off for an employee's need to receive a vaccine or booster shot from any approved pharmaceutical company. Employees will be permitted time off to obtain a vaccine or booster consistent with the parameters of that Act.

Proof of Vaccination

You must provide written proof of vaccination from the vaccine administrator or a CDC-issued vaccination card, including the vaccination place, date(s), name, and lot number to Joyelle Bateman, Infection Control Practitioner, by 4:00 p.m. on November 16, 2021. Do not include any medical or genetic information with your proof of vaccination. JAA will keep your vaccination information confidential.

Requesting Additional Time

Employees who have attempted to comply with the policy but are unable to meet the deadlines for receiving a full dosage of vaccine or submitting medical documentation to support a medical exemption, through no fault of their own, should contact the Human Resources Department in advance of November 16, 2021 to request a temporary extension to the compliance deadline.

Accommodation and Exemption Requests

Disability Accommodation

JAA provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. Reasonable accommodation may include appropriate adjustment or modifications of employer policies, including this Mandatory Vaccination Policy.

If you believe you need an accommodation regarding this policy because of a disability, you are responsible for requesting a reasonable accommodation from the Human Resources Department no later than October 21, 2021 to allow time for review prior to November 16, 2021.

Religious Accommodation

JAA provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated for COVID-19.

If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for requesting a reasonable accommodation from the Human Resources Department.

Interactive Process

If you request an accommodation, JAA will engage in an interactive dialogue with you to determine the precise limitations of your ability to comply with this Mandatory Vaccination Policy and explore potential reasonable accommodations that could overcome those limitations and eliminate any direct threat. JAA encourages employees to suggest specific reasonable accommodations. However, JAA is not required to make the specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on JAA or posing a direct threat to you or others in the workplace.

Exemption for Other Medical Reasons

Exemptions for other medical reasons may be available on a case-by-case basis even if they do not qualify as a disability under federal, state, or local law. JAA will engage in an interactive dialogue with you to determine whether an exemption is appropriate and can be granted without imposing an undue hardship on JAA or posing a direct threat to you or others in the workplace. However, JAA reserves the right to take any necessary and appropriate steps, including imposing alternative COVID-19 prevention measures, to ensure that the individual does not pose a direct threat to the health or safety of others in the workplace. You must fill out the applicable forms and provide the information requested for your exemption request to be considered.

Employees who refuse to receive a COVID-19 vaccine for personal or philosophical reasons will not receive an exemption from this policy.

How to Request an Accommodation or Exemption

You may request a reasonable accommodation or other exemption from this policy orally or in writing from the Human Resources Department.

When requesting an accommodation, please provide all relevant information, including:

- A description of the accommodation or exemption requested.

- The reason for the requested accommodation or exemption.

JAA may provide you with a form to fill out for your accommodation request. You must fill out the applicable forms and provide the information requested. JAA reserves the right to request additional documentation supporting the need for an accommodation or request for exemption. JAA will keep confidential any medical information obtained in connection with your request for a reasonable accommodation or exemption.

Determinations

JAA makes determinations about requested accommodations and exemptions on a case-by-case basis considering various factors and based on an individualized assessment in each situation. JAA strives to make these determinations expeditiously and in a fair and nondiscriminatory manner and will inform you after we make a determination. If you have any questions about an accommodation or exemption request you made, please contact the Human Resources Department.

Employees who receive an accommodation or exemption and fail to comply with the applicable requirements may face corrective action, up to and including termination of employment.

GINA Safe Harbor

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, JAA asks that you not provide any genetic information when responding to a request for medical information related to accommodation or exemption request or when providing written proof of vaccination status.

“Genetic information,” as defined by GINA, generally includes:

- An individual’s family medical history.
- The results of an individual’s or family member’s genetic tests.
- The fact that an individual or an individual’s family member sought or received genetic services or participated in clinical research which includes genetic services.
- Genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive technology.

Policy Administration and Questions

Joyelle Bateman, Infection Control Practitioner, is responsible for administering and enforcing this policy. If you have any questions about this policy or about health and safety issues that are not addressed in this policy, please contact the Infection Control Practitioner. Linda Simmeth, Director of Human Resources, is responsible for accommodation and exemption requests under

this policy. If you have any questions about those aspects of this policy, please contact the Director of Human Resources.

Policy Modification

Government and public health guidelines, restrictions and business industry best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available and further research is conducted. JAA reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace and in accordance with applicable law.

Enforcement and Non-Retaliation

Failure to comply with or enforce this policy may result in discipline, up to and including termination of employment.

JAA prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern. Employees also have the right to report work-related injuries and illnesses, and JAA will not discharge or discriminate or otherwise retaliate against employees for reporting work-related injuries or illnesses or good faith health and safety concerns.

