

KCHA COVID-19 VACCINATION POLICY FAQ'S

- 1. Why is KCHA requiring vaccination?** Primarily because there is a surge in illness and death from the delta variant of COVID-19, which can be prevented by widespread vaccination. While non-pharmaceutical interventions such as wearing face coverings and social distancing helps to reduce the spread of COVID-19, the COVID-19 vaccination has been proven as a safe and highly effective measure in preventing COVID-19 infection and limiting hospitalization and death. Widespread vaccination is also the primary means to prevent and curtail the spread of new variants of the COVID-19 virus, avoid the return of stringent public health measures, and end the COVID-19 pandemic. After very careful deliberation, KCHA leadership concluded that we are obligated by our values and by our responsibility to protect the health and life of those we serve, our staff and their families, our partners and community by requiring use of the safe and effective vaccines.
- 2. What does “condition of employment” mean?** It means that unless they have submitted and received approval for a qualifying medical or religious exemption, KCHA staff will need to provide proof to Human Resources via Apricity that they are fully vaccinated to remain employed with the agency.
- 3. What does “fully vaccinated” mean?** For purposes of this Guidance, people are considered fully vaccinated if they have received COVID-19 vaccines currently approved or authorized for emergency use by the U.S. Food and Drug Administration (Pfizer-BioNTech, Moderna, and Johnson & Johnson [J&J]/Janssen COVID-19 vaccines) or COVID-19 vaccines that have been listed for emergency use by the World Health Organization (e.g., AstraZeneca/Oxford). Someone is fully vaccinated two weeks after they have received the second dose of the Pfizer or Moderna vaccine; or two weeks after receiving a single dose of the Johnson & Johnson vaccine.
- 4. When is the deadline for submitting proof of fully vaccinated status?** The deadline for reaching fully vaccinated status and providing proof is February 28, 2022. Staff should review this vaccination schedule to ensure they meet the deadline.

Pfizer (21 days between doses)	1st shot administered no later than Jan 23 2nd shot administered no later than Feb 14
Moderna (28 days between doses)	1st shot administered no later than Jan 16 2nd shot administered no later than Feb 14
Johnson and Johnson	Single shot administered no later than Feb 14

- 5. Does the vaccine requirement or collection of vaccination information violate any HIPAA laws?** No. It is not a violation of HIPAA for KCHA to collect vaccination status for the vaccine requirement. For more information, please visit [HIPAA, COVID-19 Vaccination, and the Workplace | HHS.gov](#)
- 6. Must employees who previously submitted a vaccine attestation form provide proof of vaccination?** Yes. All employees must follow the instructions for providing proof of vaccination. See instructions in answer to the following question.

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7. **What documents are acceptable proof of fully vaccinated status?** Proof of Full Vaccination Against COVID-19 shall be uploaded to Apricity Wellness App by February 28, 2022, employees must submit a picture or scanned copy of one of the following:
- CDC COVID-19 Vaccination Record Card or photo of the card;
 - Documentation of vaccination from a health care provider or electronic health record;
 - State immunization information system record [MyIRmobile.com](https://myirmobile.com); or
 - For an individual who was vaccinated outside of the United States, a reasonable equivalent of any of the above.

Personal attestation is not an acceptable form of verification of COVID-19 vaccination.

8. **What if I need help uploading my proof of vaccination documents to Apricity?** You can email HRCOVIDOPS@kcha.org.
9. **Will KCHA retain my proof of vaccination that I provide?** Apricity stores the vaccination card and the date(s) of your vaccination dose(s). Apricity complies with the standard of electronic data security requirements set by Department of Health and Human Services (HHS) for medical records.
10. **Who will have access to my vaccination status?** Designed HR staff and Apricity administrators will have access to vaccination status and treat this information like other sensitive medical information in KCHA systems.
11. **What if there is a delay through no fault of the employee in being able to prove that they are vaccinated?** Fully vaccinated employees who do not have access to their vaccine cards AND are unable to access their vaccine record from their medical provider or by visiting [MyIRmobile.com](https://myirmobile.com) should document their attempts to request their records and notify HR at HRCOVIDOPS@kcha.org as soon as possible.
12. **What if an employee is vaccinated but refuses to provide verification?** Barring an approved exemption, KCHA employees must provide proof of vaccination. Employees who are vaccinated but refuse to provide verification by February 28, 2022 will be deemed out of compliance and put on administrative leave on March 1. On March 31, 2022, these employees will be automatically separated from employment. Regular and long term temporary benefits-eligible employees who have completed their 6 month introductory period will be eligible for paid administrative leave. Temporary hires and interns are not eligible for paid administrative leave.
13. **If I have contracted COVID-19 and have fully recovered from my symptoms, will I still need to receive the vaccine?** Yes. The CDC still recommends vaccination for individuals previously exposed to the COVID-19 virus. Following this guidance, regardless of your previous exposure to the COVID-19 virus, full vaccination will still be required as a condition of employment.

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14. **How are masking rules determined?** KCHA follows guidance from Washington state and Labor & Industries, along with public health recommendations and mandates.
15. **If I wear a mask and social distance at work, why do I need to be vaccinated?** Given what is known about the COVID-19 and vaccine effectiveness, layered prevention strategies are needed to reduce the transmission of the COVID-19 virus. Significant efforts have been made to address workplace safety in the face of COVID. We now have the tool of vaccine, which is the single most effective resource to combat spread, and prevent illness and death.
16. **If staff are able to work remotely, why do they need to be vaccinated?** KCHA must balance the need to achieve business priorities and objectives with the employee's need to balance personal responsibilities and work demands. As we continue with our recovery planning, staff can be recalled into the workplace to meet business needs, attend meetings, or provide services to our residents.
17. **How do I ask for a qualifying exemption? And what does the process look like?** Staff can request an exemption form through Human Resources by emailing HRCOVIDOPS@kcha.org or it can be found on the P:Drive **COVID Vaccine REQUIREMENT**. Thoroughly completed exemption forms and supporting documentation must be received via email at HRCOVIDOPS@kcha.org by December 29, 2021 to initiate the exemption review process. KCHA has partnered with law firm Ogden Murphy Wallace, P.L.L.C. to review exemption requests to evaluate the nature and validity of the request in alignment with the ADA, EEOC and state guidelines. If more information is needed, HR will contact you with additional questions. If sufficient information was provided, HR will provide the requestor a written determination of approval or denial of the exemptions. Supervisors of staff who request exemptions will be notified of delays and final decisions.
18. **What constitutes a sincerely held belief for the religious exemption?** KCHA will follow the Americans with Disabilities Act, EEOC, and state guidelines for exemptions. Staff must demonstrate a sincerely held religious belief, observance or practice that prevents the employee from receiving the vaccine. This term is explained more fully in KCHA's COVID-19 Vaccination Policy. If you have additional questions, please email HRCOVIDOPS@kcha.org. Requests for this exemption will be reviewed on a case-by-case basis by KCHA's legal counsel. Personal social, political, or philosophical beliefs do not qualify for exemption.
19. **What constitutes a medical exemption?** KCHA will follow the Americans with Disabilities Act, EEOC, and state guidelines for exemptions. A medical exemption means you cannot get the vaccine due to a medical condition. Medical exemptions must be determined by a licensed healthcare provider and confirmed to KCHA by the provider using the medical exemption request form.

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20. **Will all employees who receive an exemption receive reasonable accommodations to continue working for KCHA?** KCHA may not be able to reasonably accommodate all those who request and receive an exemption. KCHA is not required to grant accommodations if they cause undue hardship or pose a direct threat to the safety and health of others. The undue hardship standard for religious exemptions is lower than for medical accommodations. Examples of an undue hardship for the purpose of accommodating a sincerely held religious belief include if the accommodation involves more than a de minimis cost or burden on operations, infringes on other employees' job right or benefits, violates a collective bargaining agreement, causes lack of necessary staffing, jeopardizes the health and safety of others, decreases workplace efficiency or workplace productivity, or has a negative impact on other employees. If a reasonable accommodation is identified, the accommodation will be subject to continuous review and evaluation depending on guidance from public health officials. Reasonable accommodations may need to be changed or modified as circumstances change.
21. **If someone is granted a religious or medical exemption and accommodation, what safety protocols will be enforced?** Staff who are approved for exemption must follow required safety protocols, including but not limited to wearing a mask and social distancing and any other protocols deemed appropriate in the future, including weekly testing.
22. **Will KCHA separate vaccinated/unvaccinated workers within the office?** No. KCHA values all employees and respects individuals who have an approved exemption from the vaccine requirement. Individuals who receive an exemption will adhere to safety protocols noted above.
23. **What if my exemption request is denied?** Employees must then comply with the February 28, 2022 deadline to provide proof that they are fully vaccinated or separate employment.
24. **Is there an appeal process if my request is denied?** Employees will have up to ten days to request an appeal, following an exemption denial.
25. **If I know that I will not comply with the vaccine mandate, what should I do?** Notify your supervisor and HR to discuss your situation further and/or review the process for separation from employment. Regular and Long Term Temporary, benefits-eligible employees having completed their 6 month introductory period who separate employment due to the vaccine mandate are eligible for the thirty days of paid administrative leave.
26. **What happens if I do not comply with the vaccination requirement?** Regular and Long Term Temporary, benefit-eligible employees who do not provide proof of full vaccination by February 28, 2022, or who do not have an approved exemption, will be placed on paid administrative leave on March 1, 2022 for thirty (30) calendar days and then separated from employment on March 31, 2022. Trainees and temporary workers are not eligible for paid administrative leave and will be separated from employment on March 1, 2022 if they do not

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meet the requirement.

27. **If I am placed on paid administrative leave for non-compliance, and decide to become vaccinated while on leave, can I return to my position?** No. Employees placed on paid administrative leave will be separated at the end of thirty calendar days. If an employee decides to become fully vaccinated, they may reapply for employment with KCHA.
28. **Will KCHA provide time off work to receive the vaccine?** Yes. Staff may use one day of COVID emergency paid sick leave for each vaccination dose appointment scheduled during their normal work hours.
29. **What happens if I temporarily don't feel well after receiving the vaccine and I am unable to work?** In alignment with KCHA work and play plan, staff can access the emergency paid sick leave benefit if they don't feel well after receiving the vaccine.
30. **Am I eligible to apply for unemployment benefits if I'm separated from employment for declining to receive the vaccine?** Eligibility for unemployment benefits is determined by the state Employment Security Department. It is currently unknown if separation from employment for not meeting an employer's vaccination requirement will qualify for consideration.
31. **What about booster shots? What is the timing and documentation required?** Staff will be required to keep up to date with booster vaccinations if required by public health agencies, and once boosters are available locally. As we get more information regarding booster shots, KCHA will provide additional guidance to staff and supervisors.
32. **Will service partners and contracted providers be required to be vaccinated?** The executive team and a VRT subcommittee is engaging with key stakeholders to understand our contractual rights for contractors and contracted service partners.
33. **What is KCHA's plan going forward to ensure there are not long-term requirements for employment conditions based on medical information?** The COVID-19 pandemic is an unprecedented world-wide event and impacts all places of employment. The agency's vaccine policy is in response to the life-threatening safety concerns that this pandemic poses for KCHA staff and those we serve. While we cannot predict if there will be another pandemic or major health emergency, KCHA will comply with public health guidance and requirements in the future, as necessary.
34. **What does this vaccination requirement mean for current recruitments and new hires between now and February 28?** This vaccine requirement applies to applicants immediately. Recently hired staff will have until February 28, 2022 to meet the requirement. Applicants hired now, and in the future are required to submit proof of vaccination or notify Human Resources of a request for exemption before their first day of employment. The

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Human Resources recruitment team will notify applicants for active recruitment postings and confirm this requirement at the time of an employment offer.

35. If a staff member is not exempted and has not been vaccinated by February 28 and on paid administrative leave, what does this mean for hiring/fulfilling work functions?

Supervisors have the option of hiring temporary employees to fill the vacancy while they initiate recruitment for a regular placement.

36. If I am a supervisor, who will keep track of my staff's vaccination statuses and who will communicate with staff as we approach the February 28 date? Designated HR staff will track vaccination status and will communicate with staff who have not provided documentation as we approach the February 28, 2022 date. HR can provide summary information to supervisors upon request.

37. If am a supervisor, will I be notified of staff who receive an exemption? Yes. Supervisors will be involved in the reasonable accommodation process for their exempted team members so as to assist KCHA in implementing the accommodations. However, KCHA supervisors and management are not permitted to disclose an employee's vaccination status to other employees, clients, or others except on a need-to-know basis (the same as any other medical information about an employee).

Questions: HRCOVIDOPS@kcha.org

Resources:

[KCHA Vaccination Policy](#)

[Vaccines for COVID-19 | CDC](#)

[Vaccinate WA: Find COVID-19 Vaccine Appointments Near You](#)

[Employee Assistance Program](#)

Forms:

[COVID-19 Vaccination Request for Medical Exemption](#)

[COVID-19 Vaccination Request for Religious Exemption](#)