



THIS DOCUMENT IS A GENERAL TEMPLATE THAT SHOULD BE MODIFIED TO FIT YOUR COMPANY'S SPECIFIC CIRCUMSTANCES.

CONSULT WITH LEGAL COUNSEL WITH REGARD STATE AND LOCAL LAW REQUIREMENTS THAT MAY HAVE DIFFERENT OR ADDITIONAL PROVISIONS. THERE IS A RISK THAT COMPLIANCE FEDERAL CONTRACTOR REQUIREMENTS MAY VIOLATE STATE OR LOCAL LAWS.

COLLECTIVE BARGAINING AGREEMENTS MAY HAVE ADDITIONAL REQUIREMENTS THAT DO NOT CONFLICT WITH FEDERAL LAWS

NOTE THAT COVID-19 GUIDANCE AND REQUIREMENTS ARE SUBJECT TO CHANGE BASED ON NEW SCIENTIFIC INFORMATION, PROMULGATION OF NEW LAWS AND REGULATIONS, COURT DECISIONS, AND AGENCY INTERPRETATIONS.

COVID-19 Policy for Federal Contractors & Subcontractors

With the community spread of the respiratory disease SARS-CoV-2 ("Coronavirus" or "COVID-19"), employees must observe health and safety protocols to reduce the transmission of COVID in the workplace.

Our company provides services under federal contracts and/or subcontracts. The purpose of this COVID-19 Policy for Federal Contractors and Subcontractors (the "Policy") is to outline the steps that we must take to reduce the risk of exposure to COVID-19 in our workplace, and comply federal laws, regulations and guidance documents, and the requirements of our customers with regard to the safety of the federal workforce (the "Federal Requirements").

This Policy is intended to comply with Presidential Executive Order 14042, the applicable federal agency Class Deviation Memoranda, regulations and guidance documents including those published by the Safer Federal Work Force Task Force at <https://www.saferfederalworkforce.gov> including updates published from time to time, and the terms and conditions of the contracts with our customers.

[insert description of how your company will comply with state and local laws -consult with legal counsel on situations where local or state law directly conflicts with federal contractor requirements]

This policy is effective as of [insert date].

Requirements

The Company encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees in the workplace, and to read this publication which is posted [on the bulletin board] and available on the internet: [Key Things to Know About COVID-19 Vaccines](#).

The Company requires all employees who work on or in connection with a federal contract or subcontract, or at a location where federal contract or subcontract work is conducted, to be fully vaccinated by the applicable deadlines.

Scope

This Policy applies to all Company employees, including employees who work remotely and employees who work only outside or alone.

*[except for employees who (a) do not work on or in connection with any federal contract or subcontract, **and** (b) do not work at any location where others who work on or in connection with a federal contract or subcontract are likely to be present (these include: [insert list].)]*

The federal government and/or our customers may require our employees to provide proof of vaccination status or proof of a negative test for admittance to certain locations, to wear face coverings and to observe other COVID-19 safety protocols while on-site.

Deadlines

All current employees are encouraged to be fully vaccinated as soon as possible, and in any event, no later than January 18, 2022.

Beginning on January 18, 2022, employees who are not fully vaccinated may not conduct any work on or in connection with a federal contract or subcontract.

Vaccinations

*Persons are considered “**fully vaccinated**” two weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses. For example, this includes two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two weeks after a single-dose vaccine, such as Johnson & Johnson vaccine, or two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series.*

Generally, vaccines listed for emergency use by the World Health Organization (WHO), or administered as part of a clinical trial at a U.S. site, if the recipient is documented to have primary vaccination with the active (not placebo) COVID-19 vaccine candidate, for which vaccine efficacy has been independently confirmed (e.g., by a data and safety monitoring board) or if the clinical trial participant at U.S. sites had received a COVID-19 vaccine that is neither approved nor authorized for use by FDA but is listed for emergency use by WHO, qualify under the definition of “fully vaccinated” as well.

Current employees must complete their primary vaccination series no later than January 4, 2022, in order to be fully vaccinated by January 18, 2022.

Thereafter, all new employees must be fully vaccinated prior to starting work on or in connection with any federal contractor or subcontract.

To complete the primary vaccination series by January 4, 2022, an employee must:

- Obtain the first dose of the Pfizer vaccine no later than December 14, 2021; and the second dose no later than January 4, 2022;
- Obtain the first dose of the Moderna or any other non-Pfizer two dose vaccine no later than December 7, 2021; and the second dose no later than January 4, 2022;
- Obtain the second dose of any other non-Pfizer, non-Moderna two dose vaccine no later than January 4, 2022 (it is the employee's responsibility to ensure that the first dose is received in time for the second dose to be administered on or before January 4, 2022 with the requisite interval time in between doses);
- Obtain one dose of Johnson & Johnson or other single dose vaccine no later than January 4, 2022.

Employees can schedule vaccination appointments through a variety of methods (e.g., through their own medical provider, by visiting their local pharmacy at community mass-vaccination clinic, etc.). There are several ways to look for vaccination providers:

- Visit [Vaccines.gov](https://www.vaccines.gov) to find vaccination providers near you.
- Text your ZIP code to 438829 or call 1-800-232-0233 to find vaccine locations near you.
- Check your local pharmacy's website to see if vaccination appointments are available.
- Contact your [state health department](#) to find additional vaccination locations in the area.
- Check your local news outlets. They may have information on how to get a vaccination appointment.

If you need help making a vaccination appointment, please contact [name, phone, email].

Acceptable Forms of Proof of Vaccination Status

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted [insert instructions – by email, bring original card to HR, internet app by phone or computer, etc.]

Acceptable proof of vaccination status is:

1. The original record of immunization from the health care provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination(s);
4. A copy of immunization records from a public health, state, or tribal immunization information system; or
5. 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 should include the employee's full 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. In some cases, state immunization records may not include one or more of

these data fields, such as clinic site; in those circumstances the Company will still accept the state immunization record as acceptable proof of vaccination.

*If any employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so, please contact HR for instructions. **[Self-attestation is not permitted for federal contractors/subcontractors]***

In accordance with applicable medical record and confidentiality laws, the Company will maintain a record of each employee's vaccination status and will preserve acceptable proof of vaccination for each employee.

Supporting COVID-19 Vaccination – Paid Time Off and Incentives

CHECK STATE AND LOCAL REQUIREMENTS AND COLLECTIVE BARGAINING AGREEMENTS FOR PTO

EMPLOYER MAY VOLUNTARILY OFFER CASH OR OTHER INCENTIVES AND/OR PTO TO ENCOURAGE EMPLOYEES TO GET VACCINATED BY A CERTAIN DATE.

Employees who are not yet fully vaccinated may take paid time off up to ___ hours for each dose.

Paid time off referenced above [does/does not] apply to booster shots or additional doses after becoming fully vaccinated

This paid time is the employee's actual time to travel to the vaccination site, receive a vaccination, and return to work during a regularly scheduled workday. This would mean a maximum of ___ 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 ___ hours to get the vaccine must send their supervisor an email documenting the reason for the additional time (e.g., 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, to cover the additional time. If an employee is vaccinated outside of their approved paid time, they will not be compensated.

Employees will not be reimbursed for transportation costs (e.g., gas money, train/bus fare, etc.) incurred to receive vaccinations.

Employees who need time to recover from a vaccination may take paid time off up to ___ hours for each dose.

OR

Employees may utilize a reasonable amount of sick leave (typically, up to two days of paid sick leave per primary vaccination dose) 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 a reasonable amount of additional sick leave immediately following each dose if necessary.

Neither the paid time required to receive any vaccine dose(s) nor the paid sick leave required to recover from side effects experienced following any vaccination dose are retroactive requirements for vaccine dose(s) received prior to [date].

Employee Notification of COVID-19 and Removal from the Workplace

The Company requires all employees, regardless of vaccination status, to promptly notify their supervisor when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider. Promptly notifying means notifying the Company as soon as practicable before the employee is scheduled to start their shift or return to work. In the event that the employee is in the workplace when they receive a positive COVID-19 test result or diagnosis of COVID-19, this means notifying the Company as soon as safely possible while avoiding exposing any other individuals in the workplace.

Medical Removal from the Workplace

The Company has also implemented a policy for keeping COVID-19 positive employees out of the workplace in certain circumstances. The Company will immediately remove an employee from the workplace if they have received a positive COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider (i.e., immediately send them home or to seek medical care, as appropriate).

Return to Work Criteria

For any employee removed because they are COVID-19 positive, the Company will keep them removed from the workplace until the employee:

- *receives a negative result on a COVID-19 nucleic acid amplification test (NAAT) following a positive result on a COVID-19 antigen test if the employee chooses to seek a NAAT test for confirmatory testing;*
- *meets the return to work criteria in CDC's "Isolation Guidance" (see below); or*
- *receives a recommendation to return to work from a licensed healthcare provider.*

Under CDC's "[Isolation Guidance](#)," asymptomatic employees may return to work once 10 days have passed since the positive test, and symptomatic employees may return to work after all the following are true:

- *At least 10 days have passed since symptoms first appeared, and*
- *At least 24 hours have passed with no fever without fever-reducing medication, and Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).*

If an employee has severe COVID-19 or an immune disease, the Company will follow the guidance of a licensed healthcare provider regarding return to work.

CHECK STATE AND LOCAL LAWS AND COLLECTIVE BARGAINING AGREEMENTS REGARDING PTO FOR REMOVAL AS A RESULT OF A POSITIVE COVID-19 TEST OR DIAGNOSIS OF COVID-19.

Face Coverings

Any employee who is not fully vaccinated must wear a face covering while working indoors and comply with other COVID-19 safety precautions as directed by the Safety Department.

In areas of substantial or high community transmission, as determined by the CDC, all employees must wear masks indoors, regardless of their vaccination status. Signs will be posted at all entrances indicating these requirements which may change from time to time.

If required by state or local law, all employees must wear face coverings even when working outdoors.

All employees must wear a face covering when occupying a vehicle with another person while traveling in a company vehicle.

Face coverings must:

- (i) completely cover the nose and mouth;*
- (ii) 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);*
- (iii) 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;*
- (iv) fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and*
- (v) be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.*
- (vi) be replaced if wet, soiled or damaged.*

Acceptable face coverings include clear face coverings or cloth face coverings with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet these criteria and which may be used to facilitate communication with people who are deaf or hard-of-hearing or others who need to see a speaker's mouth or facial expressions to understand speech or sign language respectively.

Employees are responsible for providing their own face coverings [unless state or local laws or collective bargaining agreements require employer to pay for masks.]

The following are exceptions to the requirements for face coverings:

- 1. When an employee is alone in a room with floor to ceiling walls and a closed door.*
- 2. For a limited time, while an employee is eating or drinking at the workplace*
- 3. For a limited time for identification purposes in compliance with safety and security requirements.*

4. *When an employee is wearing a respirator.*
5. *Where the Company has determined that the use of face coverings is infeasible or creates a greater hazard (e.g., when it is important to see the employee's mouth for reasons related to their job duties, when the work requires the use of the employee's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee).*

New Hires

All new employees are required to comply with this Policy as a condition of employment.

Potential candidates for employment will be notified of the requirements of this Policy prior to the start of employment.

Exceptions and Accommodations

Employees may request an exception from this Policy requirements only if the employee submits

(1) a written statement from a licensed doctor that the COVID-19 vaccine is medically contraindicated according to CDC guidance, or medical necessity requires a delay in receiving the COVID-19 vaccination, or they are entitled to a reasonable accommodation because they cannot be vaccinated and/or wear a face covering because of a disability, or

(2) a written statement that the provisions in this Policy conflict with their sincerely held religious belief, practice, or observance.

State and local laws may provide additional reasons that an employee may request an exception.

Consult with legal counsel.

Requests for exceptions and reasonable accommodations must be initiated by the employee by contacting Human Resources and submitting the appropriate forms. Political views, ethical objections, concerns about vaccination efficacy or safety, or proof of natural immunity from a prior infection or an antibody test are not acceptable reasons for requesting an exception to this Policy. All requests will be handled in accordance with applicable laws and regulations, and in accordance with applicable Company policies and procedures in a confidential manner.

Consequences for Submitting False or Misleading Information

Employees are cautioned that submitting false or misleading information required under this Policy will result in discipline up to and including termination and can constitute a violation of federal laws leading to criminal prosecution.

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 [name, email, phone].

EMPLOYEE ACKNOWLEDGEMENT

I acknowledge that I have received a copy of and read the Company's Federal Contractor Policy (the "Policy"), and that I have had an opportunity to ask questions about the Policy.

I understand and acknowledge that it is my responsibility to review the Policy and to familiarize myself with the policies and procedures contained in the Policy.

I understand that if I have any questions about the Policy or its contents, I will discuss them with my supervisor. I agree to abide by all policies and procedures contained in the Policy.

I further understand and acknowledge that the Company reserves the right to add, delete, or change any or all portion of the Policy at any time, with or without notice.

Printed Name

Employee Signature

Date