

	Title: HR Policy Manual – Supplemental Policy: COVID-19 Vaccination Policy	Author: Human Resources	Date: 2021-05-06 Version: 1.0
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HR Policy Manual Supplemental Policy: COVID-19 Vaccination Policy

PREPARED BY	ORGANIZATION	DATE
Human Resources	NRAO	2021-05-06

APPROVALS (Name and Signature)	ORGANIZATION	DATE
	NRAO	2021-05-06

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Change Record

VERSION	DATE	REASON
1.0	2021-05-06	Inclusion of policy in response to the COVID-19 Global Pandemic

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I.1 Policy

Effective September 1, 2021, an AUI/NRAO/GBO employee must be fully vaccinated against COVID-19 in order to be provided with access to any U.S. AUI/NRAO/GBO facility or office. AUI/NRAO/GBO will provide exceptions to this vaccination requirement for employees with an approved accommodation for a disability or a religious reason, as described below. For the purpose of this policy, “fully vaccinated” means that it has been 14 days since the employee has received the final vaccine in the COVID-19 vaccine series, depending on the vaccine.

I.2 Purpose

It is the responsibility of our organization to provide and maintain a workplace that is safe and free from known hazards. This policy is developed to safeguard the health of our employees and their families, our visitors, and the community at large from the virus commonly called COVID-19, the spread and effects of which have been demonstrated to be reduced by vaccinations. It is AUI/NRAO/GBO’s plan to administer this COVID-19 vaccination policy consistent with all applicable federal, state, and local laws, guidance, and authority, including guidance from the Centers for Disease Control and Prevention and public health authorities.

I.3 Scope

This policy is applicable to all U.S. employees of the AUI/NRAO/GBO, including U.S. employees who are teleworking pursuant to (1) the emergency work from home arrangements resulting from the COVID-19 pandemic; and (2) fully executed full-time or part-time telework agreements approved pursuant to HR Policy Section 2.6 (collectively referred to as “Approved Telework Agreements”).

I.3.1 Employees NOT working pursuant to an Approved Telework Agreement

Employees who are not working pursuant to an Approved Telework Agreement (e.g., employees whose job duties require facility or office access) must submit proof that they have been fully vaccinated for COVID-19 no later than September 1, 2021, unless an accommodation is requested and approved as outlined herein. If an employee does not submit proof that they have been fully vaccinated on or before September 1, 2021 and has not received an approved accommodation, the employee will not be provided with access to the work site and will be placed on leave status until a determination regarding their employment has been made; the employee may elect to use any available accrued vacation leave (V) or Leave Without Pay (LW) while in the leave status.

I.3.2 Employees working pursuant to an Approved Telework Agreement

Employees who are working pursuant to an Approved Telework Agreement will be required to be fully vaccinated for COVID-19 before they will be provided with access to an AUI/NRAO/GBO facility or office, unless an accommodation is requested and approved as outlined herein. Employees must submit

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proof that they have been fully vaccinated no later than 5 business days prior to the date access to the AUI/NRAO/GBO facility or office is needed. If an employee enters a U.S. AUI/NRAO/GBO facility or office without first submitting proof that they have been fully vaccinated at least five (5) business days prior to the access date or obtaining an approved exemption as an accommodation, the employee will be subject to discipline, up to and including termination. For the avoidance of confusion, please note that an employee, who is working pursuant to an Approved Telework Agreement that does not require an AUI/NRAO/GBO facility or office access, is not required to submit proof of vaccination.

1.3.3 Grace Period

The organization recognizes that there is a limited supply of COVID-19 vaccines and that some employees may have difficulty securing a vaccination appointment. Accordingly, the organization may, in its sole discretion, extend a “grace period” to employees who have taken good-faith steps to receive the vaccine but are having difficulty making a vaccine appointment through no fault of their own. Employees who are not working under an Approved Telework Agreement or who are working pursuant to an Approved Telework Agreement that requires facility or office access should contact Human Resources (HR) prior to September 1, 2021, if a grace period is needed.

1.4 Procedures

To provide proof of full vaccination, employees will be required to provide to HR or a designee written evidence of a completed vaccine series from an authorized healthcare provider or pharmacy. A copy of the employee’s CDC COVID-19 Vaccination Record Card will suffice. Employees should not submit any medical information other than the proof of full vaccination. The organization regards all such information as confidential and will treat it accordingly. Employees will be expected to receive any subsequent doses of the vaccine, including booster doses, as recommended by their health care provider and/or public health authorities. Intentional falsification or misrepresentation of vaccination records will result in disciplinary action, up to and including termination of employment.

Consistent with the date of AUI/NRAO/GBO’s announcement of this policy on March 17, 2021, non-exempt employees will be paid for at their regular rate of pay for time taken to receive each dose in the vaccine series taken on or after March 17, 2021, including any future vaccination or vaccination boosters that are required. Such time will be paid, regardless of whether the time is taken during regularly scheduled work hours or outside of regularly scheduled work hours. Non-exempt employees are strongly encouraged to schedule vaccination appointment(s) during their regularly scheduled work hours, to the extent possible. Time taken to receive each vaccine dose or booster should be recorded consistent with the timekeeping procedures described in Appendix I, Vaccine Policy Procedures and FAQs.

AUI/NRAO/GBO will reimburse employees for the cost of receiving each dose in the vaccine series (including any future vaccination or vaccination boosters that are required), if any, contingent upon receipt of appropriate supporting documentation. Vaccinations costs are typically covered by the federal government and are administered and coordinated through the state and local health departments. If an employee is charged a fee for the vaccination, expenses should be submitted to HR for reimbursement. In addition, employees are eligible for reimbursement for reasonable costs associated with receiving the vaccine, including mileage at the IRS reimbursement rate.

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I.5 Reasonable Accommodations

Employees in need of an exemption from this policy due to disability, or a sincerely held religious belief, practice or observance must submit a completed Request for Accommodation form to HR as soon as possible and no later than August 13, 2021. Submission of the form will begin the interactive process to determine what, if any, accommodation can be provided that does not place an undue hardship on business operations and/or otherwise pose a threat to the health and safety of individuals in the workplace, in accordance with applicable law. Each request will be evaluated on a case by case basis.

Please direct any questions regarding the need for an accommodation request to your local HR Representative. HR will provide written results of the determination to the employee.

I.6 Workplace Safety Measures

Consistent with applicable guidance, the organization will continue to require adherence to the organization’s COVID-19 safety protocols, such as wearing a mask over nose and mouth, staying at least six feet away from others, avoiding crowds, avoiding poorly ventilated spaces; and washing hands often.

The organization’s COVID-19 safety procedures that affect areas such as travel, mask use, shared use of vehicles, and in-person meetings will be adjusted in accordance with the CDC and local public health authorities’ guidance.

I.7 Vaccine Developments and Trends

Because of the rapidly changing landscape of the pandemic and vaccines, it is important to continue closely monitoring the evolving developments and trends. ES&S and HR are tasked with ensuring that this policy remains compliant with changing guidance and regulations. The organization maintains the right to alter or cancel this policy at any time at its sole discretion.