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## **COVID-19 Vaccination, Testing, and Face Covering Procedure**

**Effective Date:** 01-03-2022

**Procedure #:** A301-01

**Supports Policy #:** A301 Compliance Policy

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- I. SUMMARY:** Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole. ARS encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees. However, should an employee choose not to be vaccinated, this procedure's sections on testing and face coverings will apply. This procedure complies with OSHA's Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).
- II. DEFINITIONS:** All terms not specifically defined herein shall have the respective meanings given to them by OSHA and as may be found in 29 CFR 1910.501.
- A. **Face Coverings:** Face Coverings acceptable to ARS are clean 3-ply paper surgical masks which must be changed at least daily, or N95/KN95 masks. Face Coverings must fully cover the employee's nose and mouth. ARS makes 3-ply paper surgical masks available to employees On-Site.
- If, and only if ARS cannot provide clean 3-ply paper surgical masks, and if the employee cannot procure N95/KN95 masks, an employee may use an alternative that meets the following criteria:
- Must be laundered on a daily basis;
  - Completely covers the nose and mouth;
  - Is 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);
  - Is 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;
  - Fits snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and

- Is a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.
- B. Fully Vaccinated: Employees 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’s 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. Booster doses are not required for employees to be considered Fully Vaccinated, but are encouraged.
- C. HR: The term HR shall refer to the ARS Human Resources Department.
- D. Office and On-Site: The terms Office and On-Site may be interchangeable and refer to the ARS corporate business Office at 3264 N Evergreen Dr. NE in Grand Rapids, MI, (“Evergreen”); the Saginaw Office at 3400 N Center Rd. in Saginaw, MI; the Kalamazoo location at 524 S Park St, Kalamazoo, MI (“BARS”); or any other physical ARS business location (fixed or mobile) where ARS work or operations are performed. It does not include an employee’s residence.
- E. Telecommuting: Performing as ARS job from a designated remote location, usually from the employee’s residence, on a regularly scheduled or exclusive basis.

**III. PROCEDURE:**

**It is important to note that ARS employees who are members of hospital medical staff must also comply with hospital medical staff rules. Therefore, if hospital medical staff rules require vaccination, or specific face coverings while on hospital campus, ARS employees must comply with those rules even if they are more restrictive than this procedure.**

**A. REPORTING VACCINE STATUS:** This section III.A. applies to all employees. ARS will maintain a roster of every employee’s vaccination status. All employees are required to report their vaccination status (e.g. Fully Vaccinated, partially vaccinated, or not vaccinated) by the following deadlines via Paylocity.

<b>Vaccination Status</b>	<b>Instructions</b>	<b>Deadline(s)</b>
Employees who are Fully Vaccinated.	<ul style="list-style-type: none"> <li>• Submit a statement to HR that you are Fully Vaccinated.</li> <li>• Submit proof of vaccination.</li> </ul>	<ul style="list-style-type: none"> <li>• For existing employees: January 10, 2022.</li> <li>• For new employees: prior to start date.</li> </ul>
Employees who are partially vaccinated (i.e., one dose of a two dose vaccine series).	<ul style="list-style-type: none"> <li>• Submit a statement to HR that you are partially vaccinated.</li> <li>• Submit proof of vaccination that indicates when the first dose of vaccination was received, followed</li> </ul>	<ul style="list-style-type: none"> <li>• For existing employees: January 10, 2022.</li> <li>• For new employees: prior to start date.</li> </ul>

	by proof of the second dose when it is obtained.	
Employees who are not vaccinated.	<ul style="list-style-type: none"> <li>Submit a statement to HR that you are unvaccinated, <i>but are planning to receive a vaccination.</i></li> </ul>	<ul style="list-style-type: none"> <li>For existing employees: January 10, 2022.</li> <li>For new employees: prior to start date.</li> </ul>
	<ul style="list-style-type: none"> <li>Submit statement to HR that you are unvaccinated <i>and not planning to receive a vaccination.</i></li> </ul>	<ul style="list-style-type: none"> <li>For existing employees: January 10, 2022.</li> <li>For new employees: prior to start date.</li> </ul>

**B. CHOICE OF VACCINE or WEEKLY TESTING:** This section III.B. applies to all employees. Employees shall either be Fully Vaccinated or provide proof of weekly COVID-19 testing. Employees who do not submit proof to ARS that they are Fully Vaccinated will be required to provide proof of weekly COVID-19 testing when working On-Site. This requirement applies to all employees except for employees who exclusively Telecommute; however, if it should ever be necessary for a Telecommuting employee to appear On-Site, this requirement will apply.

**C. SUBMITTING PROOF OF VACCINATION:** All vaccinated employees are required to provide proof of COVID-19 vaccination. Proof of vaccination status can be submitted via Paylocity.

Acceptable proof of vaccination status generally should include the employee’s 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. Examples of acceptable proof are:

- 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, acceptable to ARS in its sole discretion, 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).
- If an employee is unable to produce one of these acceptable forms of proof of vaccination, despite attempts to do so (e.g., by trying to contact the vaccine administrator or state health department), the employee can provide a signed and dated statement attesting to their vaccination status (fully vaccinated or partially vaccinated); attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof; and including the following language: “I declare (or certify, verify, or state) that this statement about my vaccination status

is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties.” An employee who attests to their vaccination status in this way should to the best of their recollection, include in their attestation the type of vaccine administered, the date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine.

**D. RULES FOR FULLY VACCINATED EMPLOYEES:**

1. Fully Vaccinated employees must provide truthful and accurate proof of vaccination to ARS by using the process described in this procedure.
2. If proof has been satisfactorily submitted to ARS, a Fully Vaccinated employee need not submit to weekly COVID-19 testing.
3. A Fully Vaccinated employee is permitted to work On-Site at the Evergreen and Saginaw Offices without a Face Covering while in his or her own personal assigned workspace as long as they are more than 6 feet away from other human beings. However, a Fully Vaccinated employee shall wear a Face Covering over the nose and mouth while away from his or her own personal workspace (e.g. in the hallway, meeting room, or restroom) and when another person enters his/her workspace.

**E. EMPLOYEES WHO ARE NOT FULLY VACCINATED:** Employees who are not Fully Vaccinated must comply with the provisions of this section.

1. Face coverings. Employees who are not Fully Vaccinated must wear Face Coverings over the nose and mouth when indoors On Site and when occupying a vehicle with another person for work purposes. **Employees who are not Fully Vaccinated are NOT permitted to remove Face Coverings while in their personal workspace.** The following are the only exceptions to this requirement for Face Coverings for employees who are not Fully Vaccinated, and these exceptions are applicable only to the Evergreen and Saginaw Offices:
  - a. An Unvaccinated Employee may remove their Face Covering when the employee is alone their own assigned office with floor to ceiling walls and a closed door. (Cubicles and meeting rooms *do not* constitute an employee’s “own assigned office with floor to ceiling walls and a closed door.”)
  - b. An Unvaccinated Employee may remove their Face Covering for a limited time, while the employee is eating or drinking in the lunchroom only, on a designated break, and if the employee is at least 6 feet away from all other human beings.
  - c. An Unvaccinated Employee may remove their Face Covering for a limited time, in ARS’ sole discretion, for identification purposes in compliance with safety and security requirements (e.g. new employee photographs).

- d. An Unvaccinated Employee may remove their face covering when ARS, in its sole discretion, 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, or when the use of a face covering presents a risk of serious injury or death to the employee).
2. COVID-19 Testing Requirements for Employees who are Not Fully Vaccinated.
- a. If you work On-Site at least once every seven days:
    - 1. You must be tested for COVID-19 at least once every seven days; and
    - 2. You must provide documentation of the most recent COVID-19 test result to HR no later than the seventh day following the date of providing the previous test result.
  - b. If you do not report to the Office during a period of seven or more days (e.g., if you Telecommute for two weeks prior to reporting to the Office):
    - 1. You must be tested for COVID-19 within seven days prior to returning to the Office; and
    - 2. You must provide documentation of that test result to HR upon return to the Office.
  - c. Acceptable tests: COVID-19 test samples must be collected at a pharmacy, physician's office, hospital, or other community-based testing site. Tests may be lab tests or rapid result tests. However, self-tests/home tests are not acceptable under this procedure. All tests must be cleared, approved, or authorized, including in an Emergency Use Authorization (EUA), by the FDA to detect current infection with the SARS-CoV-2 virus (e.g., a viral test).
  - d. Testing Costs: Employee shall be responsible for any and all costs associated with COVID-19 testing.
  - e. How to submit test results: Employees shall provide documentation of test results to HR via Paylocity. If and only if Paylocity is not available, test results may be submitted via [vaccine@advancedrad.com](mailto:vaccine@advancedrad.com).
  - f. Failure to provide test results. If an employee who is not Fully Vaccinated does not provide documentation of a COVID-19 test result as required by this procedure, they will be removed from the Office until they provide a test result. Employees must use PTO, or if no PTO is available, unpaid time off until they provide a test result. Failure to provide test results in a timely fashion may result in discipline, up to and including termination.

- g. Testing after a positive COVID-19 diagnosis. Employees who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed healthcare provider, are not required to undergo COVID-19 testing for 90 days following the date of their positive test or diagnosis as long as the employee provides documentation confirming such diagnosis to ARS, in whatever form ARS in its sole discretion deems acceptable.

#### **F. SCHEDULING AND TIME OFF FOR VACCINES AND RECOVERY:**

1. Change in vaccination status. Employees who are not Fully Vaccinated may later choose to become Fully Vaccinated. ARS offers limited time off for vaccinations and, in some cases, recovery from side-effects.
2. Scheduling the COVID-19 vaccine. Employees who choose to vaccinate must schedule vaccines themselves with the provider or clinic of their choice. ARS does not offer vaccines.
3. Time off for receiving the COVID-19 vaccine. An employee may take limited time off per primary vaccine dose for purposes of travel to the vaccination site, to receive a vaccination, and to return to work. Employees should contact Ryan Duhn, MD to coordinate time off requests for this purpose.

ARS will not grant paid time or work credit to an employee for the time spent receiving a COVID-19 vaccine prior to the effective date of this procedure. If an employee chooses to receive the vaccine outside of work hours, ARS will not grant paid time to the employee for the time spent receiving the vaccine during non-work hours.

4. Time off for side effects. Employees may utilize sick days if they have side effects from the COVID-19 vaccination if the side effects are so severe that the employee is prevented from working.

#### **G. NOTIFICATION OF POSITIVE COVID-19 TEST/DIAGNOSIS AND REMOVAL FROM THE WORKPLACE:**

This section G applies to all employees.

1. Notification. Employees who are scheduled to work On-Site are required to complete the ARS COVID Symptoms Survey in Paylocity and follow the instructions, including promptly notifying their section chief and the schedulers when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

2. Removal from the Office. ARS will immediately remove an employee from the Office 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).
3. Return to work criteria. For any employee removed or absent because they are COVID-19 positive, ARS will keep them removed from the Office until:
  - h. 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; or
  - i. Meets the return to work criteria in CDC's "Isolation Guidance" in effect at the time; or
  - j. Receives a recommendation to return to work from a licensed healthcare provider. If an employee has severe COVID-19 or an immune disease, ARS will follow the guidance of a licensed healthcare provider regarding return to work.

**H. NEW HIRES:** All new employees are required to comply with the vaccination, testing, and face covering requirements outlined in this procedure as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this procedure prior to the start of employment.

**I. RECORD RETENTION:** 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.

**J. EXEMPTIONS:** Employees may be legally entitled to a reasonable accommodation if the provisions in this policy for testing for COVID-19, and/or wearing a face covering are not possible due to a disability or conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by contacting HR. All such requests will be handled in accordance with applicable laws and regulations and ARS Code of Conduct Policy.

**K. QUESTIONS:** Employees shall contact HR with any questions regarding this procedure.

**IV. RESPONSIBILITIES:**

A. Responsible Department: Human Resources Department

B. Collaborating Department: Compliance

**V. RECISSIONS:** None/new

**VI. ATTACHMENTS:** None

**VII. APPROVED BY:** Chief Legal Officer