



# Town of Coventry

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## Personnel Rule: Appendix 13 Revised 2/17/21 Revised 2/28/22 Revised 3/1/22

### Town of Coventry's Vaccination, Testing and Face Covering Policy

#### **Purpose:**

The Town of Coventry, as an employer, has an obligation to provide a safe workplace to its employees, which includes providing reasonable safeguards from infectious diseases and for the general health and safety of its employees. This obligation extends to taking reasonable, safe and effective precautions to minimize the risk of spreading infectious disease to employees and the general public that may interact with Town employees. This Vaccination, Testing and Face Covering Policy is a key part of the Town's overall strategy and commitment to maintaining a safe and healthy workplace during the COVID-19 pandemic. Additional information regarding the benefits of vaccination can be found on the [CDC's website](#).

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. The Town of Coventry 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 policy's sections on testing and face coverings will apply.

#### **Scope – Current Employees:**

This COVID-19 Policy on vaccination, testing, and face covering use applies to all employees of the Town of Coventry except for employees who do not report to a workplace where other individuals (such as coworkers or customers) are present; employees while working from home; and employees who work exclusively outdoors. This includes all Town employees, full time, part time, probationary, contractual, temporary, interns, volunteers who receive stipends and seasonal employees.

All employees are encouraged to be fully vaccinated and boosted. 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. Employees who are not fully vaccinated will be required to comply with face covering requirements at the workplace.

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status. Individuals shall complete and sign a declaration as to the authenticity of their proof of vaccination. Employees not in compliance with this policy will be subject to discipline.

## **Scope—New Hire Employees:**

~~All employees who receive a conditional offer of employment on or after April 1, 2022 must provide proof of Full Vaccination as described above, prior to beginning employment with the Town. An exemption or deferment may be granted to this requirement if the new hire can provide proof that they (1) have received the first dose and have an appointment for the second dose in a two-dose series vaccination, such as Pfizer or Moderna vaccines, (2) have an appointment for a one-dose vaccination, such as Johnson & Johnson's Janssen vaccine, or (3) are exempt from this requirement because a physician, physician's assistant, or advanced practice registered nurse determined that the administration of COVID-19 vaccine is likely to be detrimental to the covered worker's health, or the individual objects to vaccination on the basis of a sincerely held religious or spiritual belief. Failure to meet these requirements will result in a rescission of a job offer or termination.~~

~~Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering (as otherwise may be required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by contacting the Finance Department for additional information. All such requests will be handled in accordance with applicable laws and regulations and the Town of Coventry's personnel policies.~~

## **Procedures:**

### **Overview and General Information**

#### **Vaccination**

Any Town of Coventry employee that chooses to or is required to be vaccinated against COVID-19 must be fully vaccinated no later than April 1, 2022. Any employee not fully vaccinated by April 1, 2022 will be subject to the face covering requirements of the policy.

To be fully vaccinated by April 1, 2022, an employee must:

- Obtain the first dose of a two-dose vaccine; and the second dose no later than March 14, 2022; or
- Obtain one dose of a single-dose vaccine no later than March 14, 2022.

Employees will be considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine as stated above. An employee will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.

~~Vaccinations are available at no cost to the Employee at a variety of locations in and around the Coventry area and through Eastern Highland Health District.~~ Employees shall be released from work with pay to receive the vaccination, up to a maximum of 4 hours. Employees are to coordinate with their supervisor to schedule appropriate time to receive the vaccination subject to the operational needs of their department.

#### **Testing and Face Coverings**

All employees who are not fully vaccinated as of April 1, 2022 will be required to comply with the face covering policies when in the workplace, as outlined in this policy. Policies and procedures for testing and face coverings are described in the relevant sections of this policy.

## **Vaccination Status and Acceptable Forms of Proof of Vaccination**

### **Vaccinated Employees**

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 via email to [abackhaus@coventryct.org](mailto:abackhaus@coventryct.org) or paper copies may be delivered directly to any staff in the Finance Office.

Acceptable proof of vaccination status is:

1. The record of immunization from a health care provider or pharmacy;
2. A copy of the COVID-19 Vaccination Record Card;
3. A copy of medical records documenting the vaccination;
4. A copy of immunization records from a public health, state, or tribal immunization information system, such as [CT WIZ](#); 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 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. In some cases, state immunization records may not include one or more of these data fields, such as clinic site; in those circumstances The Town of Coventry will still accept the state immunization record as acceptable proof of vaccination.

Individuals shall complete and sign a declaration as to the authenticity of their proof of vaccination. Proof of vaccination will not be deemed valid unless accompanied by the individual's signed declaration. Individuals should note that it is a crime under federal law to use, buy, sell, or transfer a CDC vaccination card knowing that the card is fraudulent. A violation of this federal law is punishable by a fine or imprisonment of up to five years. 18 U.S.C. SEC. 1017. It is also a crime under Connecticut State law punishable pursuant to Section 53a-157b of the Connecticut General Statutes by a fine of not more than \$2,000 or imprisonment of not more than one year.

Personal attestations are not acceptable as proof of vaccination status.

**All employees, both vaccinated and unvaccinated, must inform The Town of Coventry of their vaccination status no later than April 1, 2022.**

### **Supporting COVID-19 Vaccination**

An employee may take up to four hours of duty time per dose to travel to the vaccination site, receive a vaccination or booster, and return to work. This would mean a maximum of twelve hours of duty time for employees receiving two doses and a booster. If an employee spends less time getting the vaccine, only the necessary amount of duty time will be granted. Employees who take longer than four hours to get the vaccine or booster must send their supervisor an email documenting the reason for the additional time (e.g., they may 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 duty time they will not be compensated.

Employees may utilize up to two workdays of sick leave immediately following each dose or booster if they have side effects from the COVID-19 vaccination that prevent them from working. Such time should be clearly documented on the employee's timecard as "COVID" time so that it can be processed correctly by finance.

### **Employee Notification of COVID-19 and Removal from the Workplace**

The Town of Coventry will require employees 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.

Any employee experiencing symptoms may request a home test kit from the Town. The Town will provide an at home test kit at no cost to the employee if available.

#### Medical Removal from the Workplace

The Town of Coventry has also implemented a policy for keeping COVID-19 positive employees from the workplace in certain circumstances. The Town of Coventry 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

Under CDC's Quarantine and Isolation guidance, employees may return to work after 5 days have passed since the positive test, pending the employee is fever-free for 24 hours and symptoms are improving. A well-fitted facemask is required for ~~10~~5 full days after a positive test

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

Employees should keep their supervisors informed of their status during isolation and their planned return to work.

### **Face Coverings**

Depending on the status of COVID 19, per CDC guidelines, the Town of Coventry may require all employees to wear a face covering. 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. 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.

The following are exceptions to the Town of Coventry's requirements for face coverings. These are in effect when masks are suggested by CDC guidelines:

1. When an employee is working outdoors.
2. When an employee is alone in a room with floor to ceiling walls and a closed door.
3. For a limited time, while an employee is eating or drinking at the workplace or for identification purposes in compliance with safety and security requirements. Unvaccinated staff must remain at least 6 feet away from others while eating or drinking.
4. When an employee is wearing a respirator or facemask.

## **Violations of these Regulations**

Employees who fail to comply with these regulations will be subject to disciplinary action, up to and including termination of employment.

Employees who are exempt from vaccination who do not abide by the reasonable accommodations and safety protocols established for unvaccinated individuals will be subject to discipline, up to and including termination of employment, and will not be allowed in Town facilities or on Town premises.

Covered workers other than employees who fail to comply with these regulations may be excluded from Town facilities and/or school premises, and/or may have contracts for services suspended or terminated.

## **Non-Retaliation**

The Town of Coventry prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of these regulations or any other health and safety concern, or for requesting and/or receiving an exemption to the COVID-19 vaccination requirement and reasonable accommodations pursuant to these regulations.

## **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 Amanda Backhaus in the Finance Department: 860-742-3528 or [abackhaus@coventryct.org](mailto:abackhaus@coventryct.org)

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