



Town of Coventry

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Personnel Rule: Appendix 13

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. This policy complies with OSHA's Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).

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. 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 provide proof of weekly COVID-19 testing and wear a face covering 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, and, if not fully vaccinated, their testing results. 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 January 3, 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 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 December 6, 2021. Any employee not fully vaccinated by December 6, 2021 will be subject to the regular testing and face covering requirements of the policy.

To be fully vaccinated by December 6, 2021, an employee must:

- Obtain the first dose of a two dose vaccine; and the second dose no later than November 22, 2021;
or
- Obtain one dose of a single dose vaccine no later than November 22, 2021.

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 December 6, 2021 will be required to undergo regular COVID-19 testing and wear a face covering when in the workplace. 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 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 December 5, 2021.

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, and return to work. This would mean a maximum of eight hours of duty time for employees receiving two doses. 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 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 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.

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

For any employee removed because they are COVID-19 positive, the Town of Coventry 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"; 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 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.

COVID-19 Testing

All employees who are not fully vaccinated will be required to comply with this policy for testing no later than January 3, 2022.

Employees who report to the workplace at least once every seven days:

- (A) must be tested for COVID-19 at least once every seven days; and
- (B) must provide documentation of the most recent COVID-19 test result to the Finance Department no later than the seventh day following the date on which the employee last provided a test result.

Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were teleworking for two weeks prior to reporting to the workplace):

- (A) must be tested for COVID-19 within seven days prior to returning to the workplace; and
- (B) must provide documentation of that test result to the Finance Department upon return to the workplace.

Proof of weekly COVID-19 testing must be submitted via email to abackhaus@coventryct.org or paper copies may be delivered directly to any staff in the Finance Office.

If an employee does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from the workplace without pay until they provide a test result.

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.

COVID-19 tests are available at a variety of locations in and around the Coventry area and through Eastern Highland Health District. In the event that Employees choose to get tested during their normal work hours, the employee must coordinate with their supervisor to schedule appropriate time subject to the operational needs of their department. Employees who choose to get tested during normal work hours will not be paid for such absence. The appropriate amount of accrued time off (personal, sick, vacation) will need to be noted on the employee's time card. Any related costs to obtaining weekly COVID-19 tests will be the responsibility of the Employee.

Face Coverings

The Town of Coventry will require all employees who are not fully vaccinated 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.

Employees who are not fully vaccinated must wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for face coverings will be implemented, along with the other provisions required by OSHA's COVID-19 Vaccination and Testing ETS, as part of a multi-layered infection control approach for unvaccinated workers.

The following are exceptions to the Town of Coventry's requirements for face coverings:

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.
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, including, but not limited to, the weekly COVID-19 testing requirement, 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

Policy adopted by Town Council on 11/15/2021