
OSHA COVID-19 Vaccination, Testing and Face Covering Policy

PURPOSE:

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 COVID-19 vaccines have been determined to be a safe and effective measure for preventing serious illness or death from the virus. Addus encourages all employees to receive a COVID-19 vaccination to protect themselves, our clients and patients, 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). In locations and settings where there are local, state, and/or federal regulations that are differing or more restrictive, the requirements of the stricter regulation will be followed.

SCOPE:

This COVID-19 Policy on vaccination, testing, and face covering use applies to all employees of Addus HomeCare and all subsidiaries, except those that are fully remote working from home. Employees who are remote but visit a location or setting that are subject to the requirements of this policy must be in full compliance prior to being on-site at that setting. Employees who travel out of state must also familiarize themselves with any additional requirements and restrictions they may be subject to due to the nature of their travel.

POLICY:

All employees are required to report their vaccination status by 1/10/2022 and, if vaccinated, provide proof of vaccination. Employees who are unvaccinated by 1/10/2022 must also comply with the face covering guidelines in this policy. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their testing results. Employees who do not maintain compliance with this policy will be subject to discipline up to and including termination.

All employees are encouraged to be fully vaccinated. Employees who are not fully vaccinated by 2/9/2022 or employees with an approved exemption will be required to provide proof of weekly COVID-19 testing. *Note: Employees who have completed the entire primary vaccination series by 2/9/2022 do not have to be tested even if they have not yet completed the 2-week waiting period.*

Employees may request an exception from vaccination requirements (if applicable) if:

- Vaccination is medically contraindicated;
- Medical necessity requires a delay in vaccination; or
- The employee is legally entitled to a reasonable accommodation under federal civil rights laws because they have a disability or sincerely held religious beliefs, practices, or observances that conflict with the vaccination requirement.

DEFINITIONS:

COVID-19 (Coronavirus Disease 2019)

- The disease caused by SARS-CoV-2 (severe acute respiratory syndrome coronavirus 2). For clarity and ease of reference, this policy also uses the term “COVID-19” when describing exposures or potential exposures to SARS-CoV-2.

COVID-19 test:

- A test for SARS-CoV-2 that is:
 - 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);
 - Administered in accordance with the authorized instructions; and
 - Not both self-administered and self-read unless observed by the employer or an authorized telehealth proctor. Examples of tests that satisfy this requirement include tests with specimens that are processed by a laboratory (including home or on-site collected specimens which are processed either individually or as pooled specimens), proctored over-the-counter tests, point of care tests, and tests where specimen collection and processing is either done or observed by an employer.

Face covering:

- A covering that:
 - 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.
- This definition includes 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 this definition 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.

Facemask

- A surgical, medical procedure, dental, or isolation mask that is FDA-cleared, authorized by an FDA EUA, or offered or distributed as described in an FDA enforcement policy. Facemasks may also be referred to as “medical procedure masks.”

Fully vaccinated:

- A person’s status 2 weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses in accordance with the approval, authorization, or listing that is:
 - Approved or authorized for emergency use by the FDA;
 - Listed for emergency use by the World Health Organization (WHO);

Respirator:

- A type of personal protective equipment (PPE) that is certified by the National Institute for Occupational Safety and Health (NIOSH) under 42 CFR part 84 or is authorized under an EUA by the FDA. Respirators protect against airborne hazards by removing specific air contaminants from the ambient (surrounding) air or by supplying breathable air from a safe source. Common types of respirators include filtering facepiece respirators (e.g., N95), elastomeric respirators, and powered air purifying respirators (PAPRs). Face coverings, facemasks, and face shields are not respirators.

Workplace:

- A physical location (e.g., fixed, mobile) where work or operations are performed. It does not include an employee's residence. This may include an employee's vehicle if a client, patient, or another employee is also an occupant

PROCEDURES:

Vaccination Status

All employees are required to disclose their vaccine status by 1/10/2022 or upon hire thereafter. Vaccine statuses include fully vaccinated, partially vaccinated, unvaccinated, and unknown. Any employee who is unknown, partially vaccinated, or who verbally states that they are vaccinated but has not submitted acceptable proof of vaccination will be treated as unvaccinated.

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Employees hired prior to 1/9/2022 must submit proof prior to 1/10/2022. Employees hired on or after 1/10/2022 must show proof upon hire. Proof of vaccination status can be submitted directly to their worksite or through the Addus vaccine tracking platform, [VaxTrax](#).

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; 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 Addus will still accept the state immunization record as acceptable proof of vaccination.

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 Attestation of Vaccination (fully vaccinated or partially vaccinated); attesting that they have lost and are otherwise unable to produce one of the other forms of acceptable proof. 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.

Employees are encouraged to follow CDC's recommendations regarding booster shots. If an employee received a recommended booster or if a booster is required under another state mandate, records of vaccination should again be uploaded to [VaxTrax](#) or provided to their worksite. Supervisors receiving proof of vaccination must themselves promptly upload the documentation into [VaxTrax](#).

Any employee who willfully submits fraudulent documentation of vaccination will be terminated.

Vaccination

Any Addus employee that chooses to or is required to be vaccinated against COVID-19 pursuant to this OSHA Policy must receive all primary doses of the COVID-19 vaccine no later than 2/9/2022. Any employee that has not received all

primary doses by 2/9/2022 will be subject to the regular testing and face covering requirements of the policy until they are fully vaccinated.

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.

The deadlines set by this OSHA policy will not extend the deadlines put in place by other orders of vaccination set through other state or federal requirements.

There are several ways employees are encouraged to look for vaccination providers near them. If requested by the employee, worksites are expected to support with locating vaccination opportunities. Employees may:

- Visit [Vaccines.gov](https://www.vaccines.gov) to find vaccination providers nearby.
- Text their ZIP code to 438829 or call 1-800-232-0233 to find vaccine locations nearby.
- Ask their doctor, pharmacist, or community health center if they provide vaccines.
- Check their local pharmacy's website to see if vaccination appointments are available.
- Contact their [state health department](#) to find additional vaccination locations in the area.

Unless otherwise dictated by an applicable Collectively Bargained Agreement, 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 contact their supervisor for pre-approval of 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 or other paid time off, to cover the additional time. If an employee is vaccinated outside of their approved duty time they will not be compensated. Employees must submit a timesheet and proof of vaccination in order to be paid for their time off.

Employees may utilize up to two workdays of accrued leave, e.g., sick leave or other paid time off, for any scheduled workdays immediately following each dose if they have side effects from the COVID-19 vaccination that prevent them from working. Employees who have no accrued leave will be granted up to two scheduled days of additional sick leave for any scheduled workdays immediately following each dose if necessary.

Employees whose vaccination status changes during the time that this policy is in effect should promptly update their status with their worksite or directly in [VaxTrax](#).

Accommodations

Granting medical, disability, or religious exemptions of this policy will be a collaborative process between the employee and the applicable Human Resources Business Partner (HRBP). Requests should be submitted to the HRBP directly.

Employees requesting an accommodation must fully comply with all provisions of this policy, or be removed from work unpaid, until the request is approved and an accommodation is granted. A failure to adhere to this policy pending approval will result in disciplinary action up to and including termination.

Medical or Disability

If an employee claims an inability to receive the vaccine due to a disability or medical condition (and is therefore seeking an exemption to the requirement), the employee must complete the "Request for Accommodation or Exemption from the COVID-19 Vaccination" form attached to this policy. The Company will engage in a discussion with the employee and conduct an individualized assessment, taking into account the employee's disability, workplace safety, and related

factors. The Company will then determine if it can implement a reasonable accommodation to mitigate risk while allowing the Employee to be present in the workplace.

Religious

If an employee claims to be unable to receive a vaccine due to a sincerely held religious belief, practice, or observance (and is thereby seeking an allowable exemption to the requirement under state law), the employee must complete the "Request for Accommodation or Exemption from the COVID-19 Vaccination" form. The Company will engage in a discussion with the Employee and conduct an individualized assessment, taking into account the employee's sincerely held religious belief, practice, or observance, workplace safety, and related factors. The Company will then determine if it can implement a reasonable accommodation to mitigate risk while allowing the employee to be present in the workplace.

Opt-Out

OSHA gives employers the option of allowing employees to opt out of the vaccine requirement without having a medical, disability or religious exemption while still following weekly testing and face covering guidelines provided it does not present a hardship upon the Company. The Company will conduct an analysis taking into consideration factors, including but not limited to, the job responsibilities, location, service line, operational and financial burden on the Company to determine if reasonable accommodations to mitigate risk while allowing the employee(s) to be present in the workplace can be made.

Limitations on accommodations set forth by other applicable state/federal mandates will supersede the accommodations one may qualify for under this policy.

Failure to comply with the terms of a granted accommodation will result in disciplinary action up to and including termination.

Job Applicants

The requirements of this policy will be discussed with applicants who are under consideration for an offer of employment. A vaccination status which presents a hardship on the Company may disqualify an applicant from an offer of employment. Applicants who have been extended an offer of employment must provide proof of vaccination or an attestation (if not granted an accommodation) prior to arriving at the workplace.

Testing

All employees who are not fully vaccinated by 2/9/2022, including employees with approved exemptions, will be required to comply with this policy for testing. *Note: Employees who have completed the entire primary vaccination series by 2/9/2022 do not have to be tested even if they have not yet completed the 2-week waiting period.*

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 their worksite 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 supervisor] upon return to the workplace.

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 and placed on suspension without pay until they provide a test result. Employees may be

subject to disciplinary action up to and including termination for repeated failure to obtain a test, or produce proof of the test within the timeframes established by this policy.

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.

Employees are responsible for obtaining a COVID test or locating a testing site on their personal time and at their own expense. The Company will not reimburse an employee for the time it takes to test weekly, nor will the company pay for a test that an employee chooses to use as an alternative to becoming fully vaccinated. Exceptions may apply as otherwise provided for in state or federal wage and hour laws and regulations, collective bargaining agreements, other overriding regulations. Free testing sites can be located by going to the HHS website [HERE](#).

Worksite supervisors are responsible for tracking and managing the testing requirements of their direct reports. Documentation of employee COVID-19 testing will be maintained in the employee's confidential medical file located at the worksite. If a test result is positive, supervisors are required to report these results by completing a COVID-19 Incident Report located [HERE](#) so that appropriate work removal and contact tracing may occur.

Additional requirements for testing including more frequent testing requirements may be in place under state/federal requirements and will supersede the testing requirements of this policy.

Where an order prohibits a testing option, that order will control over this policy and will prevent further employment without an approved accommodation, if available.

Face Coverings

All employees who are not fully vaccinated or have an approved accommodation as of 1/10/2022 will be required to wear a face covering when in the workplace in non-public facing offices and when occupying a vehicle with another person for work purposes where there is not a state/local face covering mandate. Addus does require that all public-facing office employees wear a face covering regardless of vaccination status. Employees who provide patient/client care must wear a surgical ear loop mask or higher level of PPE according to the PPE Risk Assessment of the Respiratory Protection Program or state specific requirements.

Face coverings must:

- Completely cover the nose and mouth;
- 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);
- 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;
- Fit snugly over the nose, mouth, and chin with no large gaps on the outside of the face; and
- 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 Addus' 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 or for identification purposes in compliance with safety and security requirements.
3. When an employee is wearing a respirator or facemask.

4. Where Addus 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).

Employees at all offices may request face coverings at no cost to the employee by emailing PPERequests@addus.com.

Medical Removal from the Workplace

Addus requires 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. Additionally, employees are required to self-screen daily and report to their supervisor symptoms that may prevent them from being present in the workplace as outlined below.

Employees may not report to work if:

- They are COVID-19 positive (i.e., confirmed positive test for, or has been diagnosed by a licensed healthcare provider with, COVID-19);
- They have been told by a licensed healthcare provider that they are suspected to have COVID-19;
- They are experiencing recent loss of taste and/or smell with no other explanation; or
- They are experiencing both a fever of at least 100.4°F and new unexplained cough associated with shortness of breath.

Employees should not come to work if:

- If they have symptoms of COVID or the flu. Employees should reach out to their supervisor to discuss options such as taking a sick day or working from home, if possible.
 - Symptoms include:
 - Fever or chills
 - Cough
 - Shortness of breath or difficulty breathing
 - Fatigue
 - Muscle or body aches
 - Headache
 - New loss of taste or smell
 - Sore throat
 - Congestion or runny nose
 - Nausea or vomiting
 - Diarrhea

Employees are encouraged to seek testing if they have been exposed to COVID-19 or are experiencing any of the symptoms listed above.

Employees may use accrued paid time off, be eligible for Family Medical Leave Act, receive pay as a result of a Collective Bargaining Agreement, or be eligible for State mandated COVID pay. Employees should consult with their supervisor and/or HRBP to discuss options available to them based on their job location, vaccine status, and position.

Return to Work Criteria

For the purposes of this portion of the policy, Healthcare Professionals are all individuals who provide care to or may come into contact with patients or clients.

Non-Healthcare Professionals Positive for COVID

For any employee who **is not** considered a healthcare professional who is removed because they are COVID-19 positive, Addus 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](#) employees, regardless of vaccinations status, may return to work if:

- 5 days have passed since testing positive
- The employee remains asymptomatic or their symptoms are improving (without fever for 24 hours without the use of fever reducing medication)
- They are able to wear a mask for 5 days when in the workplace

Non-Healthcare Professionals Exposure to COVID

If the employee has been boosted OR has completed the primary series of Pfizer or Moderna vaccine within the last 6 months OR Completed the primary series of J&J vaccine within the last 2 months:

- Wear a mask around others for 10 days.
- Test on day 5, if possible.

If the employee has completed the primary series of Pfizer or Moderna vaccine over 6 months ago and are not boosted OR completed the primary series of J&J over 2 months ago and are not boosted OR are unvaccinated:

- Stay home for 5 days.
- After that continue to wear a mask around others for 5 additional days.
- Test on day 5 if possible.

Healthcare Professional Positive for COVID- All Divisions

Testing positive regardless of vaccination status will follow the CDC's **CONVENTIONAL** guidelines

- 10 day quarantine, but can return to work at 7 with a negative test

Home Health & Hospice Healthcare Professionals- Exposures

- **Boosted** individuals will follow **CONTINGENCY** guidelines
 - No work restrictions and monitoring for symptoms
- **Vaccinated** individuals will follow **CRISIS** guidelines
 - No work restrictions and a negative test sometime between days 5-7
- **Unvaccinated** individuals will follow **CONVENTIONAL** guidelines
 - 10 day quarantine, but can return to work at 7 with a negative test

PCS Healthcare Professionals- Exposures

- **Boosted** individuals will follow **CONTINGENCY** guidelines
 - No work restrictions and monitoring for symptoms
- **Vaccinated** individuals will follow **CRISIS** guidelines
 - No work restriction and monitoring for symptoms
- **Unvaccinated** individuals will follow **CONVENTIONAL** guidelines
 - 10 day quarantine, but can return to work at 7 with a negative test
 - FCG may continue to work as they do now.

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

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.

Discrimination and Retaliation:

Employees will not be discriminated or retaliated against for exercising their rights under the OSHA ETS 1910.501.

Please refer to the following link for more information:

<https://www.osha.gov/sites/default/files/publications/OSHA4159.pdf>.

Penalties for False Statements or Documentation:

Employees will be at risk for criminal employees associated with knowingly supplying false statements or documentation related to this ETS. Please refer to the following link for more information:

<https://www.osha.gov/sites/default/files/publications/OSHA4157.pdf>.

Availability of Records:

Addus will make available documents related to this policy:

- By the end of the next business day after a request, Addus will make available, for examination and copying, the individual COVID-19 vaccine documentation and any COVID-19 test results for a particular employee to that employee and to anyone having written authorized consent of that employee.
- By the end of the next business day after a request by an employee or an employee representative, Addus will make available to the requester the aggregate number of fully vaccinated employees at a workplace along with the total number of employees at that workplace.

Addus will provide to the Assistant Secretary for examination and copying:

- Within 4 business hours of a request, the Addus' written policy and the aggregate number of fully vaccinated employees at a workplace along with the total number of employees at that workplace; and
- By the end of the next business day after a request, all other records and other documents required to be maintained by this policy.