

## Unitek Learning's Vaccination and Face Covering Policy

### Position Statement on Vaccination for Students and Employees:

Unitek Learning and its schools Brookline College, Eagle Gate College, Provo College, Unitek EMT, and Unitek College, are committed to the health, safety, and welfare of our students, faculty, and staff. As a leading educator of nurses and healthcare providers we also support all the efforts being made to address the spread of COVID-19 and prevent further outbreaks. As vaccines become more widely available, we wanted to continue to encourage our students, faculty, and staff to be vaccinated as it becomes available to them.

We are developing plans for staff and faculty to return to the workplace, while adhering to Centers for Disease Control and Prevention (CDC) guidelines on social distancing for adults as well as wearing masks. Unitek will continue to follow the CDC guidelines, even in circumstances where states or counties have relaxed their requirements. We believe this is necessary to promote the health and safety of all our employees. We reserve the right to alter this position considering government or regulatory guidance or direction from medical or healthcare providers.

### Clinical Site Requirements for Vaccination

We have many clinical and externship partners that provide training and educational opportunities for our students. Those partners are establishing their own guidelines regarding vaccination. For students and faculty who may be placed in a clinical/externship setting that requires vaccination, we will make you aware of the requirement and the way to obtain the vaccine. If you elect not to be vaccinated, you will be removed from the clinical/externship placement and may be placed on an LOA for that term. This will impact your progression and your graduation date. We cannot guarantee that you can be placed at a site that does not require vaccination and we are not able to seek alternate placements for students who do not agree to the clinical vaccination requirements (for COVID or any other of the vaccinations required).

For faculty, in instances where you are assigned to a clinical site that requires vaccination, if you elect not to be vaccinated you will be removed from the teaching assignment at that clinical site and may be assigned non-clinical duties. If non-clinical duties are not available, you will be placed on furlough until an appropriate clinical assignment is available or additional duties are developed. In the event an alternate assignment is not available, you may be separated from Unitek.

If a student or clinical faculty member is unable to obtain vaccination due to a disability or underlying condition, they should engage with the ADA/504 accommodations process to evaluate the need for accommodation.

We will continue to provide additional information on vaccination expectations as we move toward a return to the workplace and in-person learning. Until that time, we encourage our students, faculty, and staff to take advantage of any opportunity to get vaccinated. Please visit the CDC website (as well as state

and county websites) for current information about the vaccine, its side effects, and the proposed distribution.

### **Purpose of this Policy:**

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. Unitek encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees as well as any subsequent booster shot(s) once eligible. Unitek also requires all employees to report their vaccination status and provide supporting documentation.

### **Vaccine Efficacy**

According to the Centers for Disease Control and Prevention (CDC), “COVID-19 vaccination reduces the risk of COVID-19 and its potentially severe complications. All COVID-19 vaccines currently authorized for use in the United States helped protect adults and children 5 years and older against COVID-19, including severe illness, in clinical trial settings. So far, studies that have looked at how COVID-19 vaccines work in real-world conditions (vaccine effectiveness studies) have shown that these vaccines are working well.

Most vaccine effectiveness data now available are related to mRNA vaccines (Pfizer-BioNTech and Moderna) because these vaccines have been available longer. CDC and other experts continue to study the effectiveness of both mRNA vaccines and the Johnson & Johnson’s Janssen (J&J/Janssen) COVID-19 vaccine in real-world conditions.

Vaccine effectiveness studies provide a growing body of evidence that mRNA COVID-19 vaccines offer similar protection in real-world conditions as they have in clinical trial settings, reducing the risk of COVID-19, including severe illness by 90 percent or more among people who are fully vaccinated.

In addition to providing protection against COVID-19, there is increasing evidence that COVID-19 vaccines also provide protection against COVID-19 infections without symptoms (asymptomatic infections). COVID-19 vaccination can reduce the spread of disease overall, helping protect people around you.” For more information, please visit the Center for Disease Control and Prevention’s COVID-19 Vaccination Hub here: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/index.html>.

### **Scope**

This COVID-19 Policy on vaccination and face covering use applies to all employees of Unitek, except for employees who do not report to a workplace where other individuals (such as coworkers or customers) are present and employees who work from home 100% of the time.

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.

Some employees may be required to have or obtain a COVID-19 vaccination as a term and condition of employment at Unitek, due to their specific job duties. Employees subject to mandatory vaccination requirements should follow all relevant vaccination procedures in this policy and are not given the choice to choose testing and face covering use in lieu of vaccination. This group includes any faculty who may be placed in a clinical setting that requires vaccination. If any employee within this group elects not to be vaccinated, he or she will be removed from the teaching assignment at that clinical site and may be assigned non-clinical duties. If non-clinical duties are not available, he or she will be placed on furlough until an appropriate clinical assignment is available or additional duties are developed.

Employees may request an exception from vaccination requirements (if applicable) if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. 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 the employee. The relevant form can be found here: [medical exemption](#) and [religious exemption](#). All such requests will be handled in accordance with applicable laws and regulations and as per Unitek's policies. Any questions about the accommodations process should be directed to HR@unitek.com.

***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. All employees will be required to wear an appropriate face covering at the workplace.***

## Overview and General Information

### **All Employees**

All employees, both vaccinated and unvaccinated, must inform Unitek of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

Vaccination Status	Instructions	Deadline(s)
Employees who are fully vaccinated.	Submit proof of vaccination that indicates full vaccination and booster shot (if eligible).	<b>February 28, 2022</b>

Vaccination Status	Instructions	Deadline(s)
Employees who are partially vaccinated (i.e., one dose of a two dose vaccine series).	Submit proof of vaccination that indicates when the first dose of vaccination was received, followed by proof of the second dose when it is obtained.	<b>February 28, 2022</b>
Employees who are not vaccinated.	Submit a statement that you are unvaccinated but are planning to receive a vaccination.	<b>February 28, 2022</b>
	Submit a statement that you are unvaccinated and not planning to receive a vaccination.	<b>February 28, 2022</b>

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. Unitek encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees as well as any subsequent booster shot(s) once eligible.

Employees may schedule their vaccination appointments through their own medical provider or with a mass-vaccination clinic.

## **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 the Optimum Safe Return Portal which can be accessed here: <https://athome.optimumhq.com/>.

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 Unitek 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 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.

## **Supporting COVID-19 Vaccination**

Employees will be entitled to up to four (4) hours of paid leave per dose during their work shift to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight (8) hours of paid leave for employees receiving two doses and a maximum of twelve (12) hours of paid leave for employees receiving two doses and a subsequent booster shot. 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 other 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 will also be entitled to up to two (2) workdays or sixteen (16) hours of paid sick leave immediately following each dose if they have side effects from the COVID-19 vaccination that prevent them from working (up to a total of four sick days). This sick leave may be used after any dose of the primary vaccination or after the booster shot. This sick leave will be tracked separately from an employee's regular paid sick leave (if any). The following procedures apply for requesting and granting

duty time to obtain the COVID-19 vaccine or sick leave to recover from side effects: the employee will need to enter their request in ADP which will then be approved by HR.

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

Unitek will require employees to promptly notify their supervisor, Campus Director (if applicable), and Human Resources when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider. Employees must provide notification of a positive COVID-19 test or diagnosis within four (4) hours.

Employees may utilize any sick leave they have accrued and if additional leave is needed, please contact Human Resources to discuss a leave of absence under the FMLA or other state/federal statutes.

### **Medical Removal from the Workplace**

Unitek has also implemented a policy for keeping COVID-19 positive employees from the workplace in certain circumstances. Unitek 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). The employee will be sent a letter informing them of the decision to remove them from the workplace and the employee's supervisor, in conjunction with HR, will work with them to coordinate the process for working remotely or taking a leave of absence.

### **Return to Work Criteria**

For any employee removed because they are COVID-19 positive, Unitek 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 and Quarantine Period Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.

Under the CDC's updated [Isolation and Quarantine Period guidance](#), people who test positive for COVID-19 should isolate for 5 days and if they are asymptomatic or their symptoms are resolving (without fever for 24 hours), follow that by 5 days of wearing a mask when around others to minimize the risk of infecting people they encounter.

Additionally, for people who are unvaccinated OR are more than six months out from their second dose of a two-shot vaccine (or more than 2 months after the one-dose Johnson & Johnson vaccine) and have not yet received their booster shot, the CDC now recommends quarantine for 5 days followed by strict mask use for an additional 5 days if exposed to COVID-19.

Individuals who are fully vaccinated AND have received their booster shot do not need to quarantine following an exposure but should wear a mask for 10 days after the exposure. Additionally, for all people

who are exposed to COVID-19, best practice would also include getting tested for COVID-19 five days after exposure. If symptoms occur, individuals should immediately quarantine until a negative test confirms symptoms are not attributable to COVID-19.

Individuals who are fully vaccinated but are not yet eligible for the booster shot because they are less than six months out from their second dose of a two-shot vaccine (or less than 2 months after the one-dose Johnson & Johnson vaccine), will not have to quarantine for 5 days but will need to strictly use a mask for 10 days if exposed to COVID-19.

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

## Face Coverings

Unitek will require all employees to wear a face covering while at the workplace. 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 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.

Employees are required to provide their own face coverings and should wear them at all times as described above.

The following are exceptions to Unitek's 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 Unitek 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).

## **New Hires**

All new employees are required to comply with the vaccination and face covering requirements outlined in this policy at the start of their employment and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to the start of employment. New employees will be required to provide their vaccination status and vaccination record on or before their first date of employment.

## **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 including but not limited to HIPPA and CCPA.

## **Questions**

This policy will be maintained by Human Resources. Please direct any questions regarding this policy to Human Resources by contacting [hr@unitek.com](mailto:hr@unitek.com).