



# POLICY & PROCEDURE

**Title:** COVID-19 Vaccination Program

**Effective:** 07/19/2021

**Applies:** University Wide

**Statement:** In the interest of maintaining the health and safety of our students, employees, guests, and all members of campus communities, WesternU requires all faculty, staff, residents, trainees, and students to be fully vaccinated and up to date as defined by the CDC against COVID-19, subject to limited exemptions discussed herein, regardless of whether they are on-site, or attending class.

In the event a federal, state, or local public health agency with jurisdiction imposes a mandate restricting or impacting this policy/program, the applicable public health mandate will be implemented. Further, in light of the evolving events around COVID-19, the University will continue to monitor federal, state, and local regulations regarding COVID-19 vaccine guidance and additional COVID-19 prevention measures.

**Purpose:** The purpose of the COVID-19 Vaccination Program is to protect and support the health and safety of the WesternU Community including University faculty, staff, students, patients, and guest.

The vaccine is available, per state guidelines, to all University employees and students.

## **Definitions:**

- 1. COVID-19 Vaccination Program:** Vaccination Program that requires SARS-CoV-2 (COVID-19) vaccination for WesternU's faculty, staff, residents, trainees, and students, subject to limited exceptions herein.
- 2. COVID-19 vaccine:** A vaccine intended to provide acquired immunity against severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) infections, the virus that causes coronavirus disease 2019 (COVID-19, as authorized by the United States [Food and Drug Administration \(FDA\)](#) or the [World Health Organization \(WHO\)](#) will be accepted. This information may change as the FDA and WHO authorize (or approve) additional vaccines.
- 3. Fully vaccinated:** You are considered fully vaccinated against COVID-19 two weeks after:
  - a. You receive a Johnson & Johnson (J&J)/Janssen COVID-19 vaccine, or
  - b. You receive a second dose of Pfizer-BioNTech COVID-19 vaccine, that is now fully approved by the FDA, or
  - c. You receive a second dose of Moderna COVID-19 vaccine, or

- d. You finished the series of COVID-19 vaccine that has been listed for emergency use by the World Health Organization (WHO).
- 4. COVID-19 Booster:** A booster dose refers to a single dose of a COVID-19 vaccine given after the protection provided by the primary dose(s) has begun to decrease over time. Please refer to the [CDC COVID-19 Vaccine Boosters](#) for current recommendations.
  - 5. “Up To Date”:** Everyone is considered up to date until the time they are eligible for a booster – which is 5 months after the second dose in a two-shot series, (Pfizer-BioNTech or Moderna vaccines), or two months after the J&J/Janssen vaccine. After this time period, a booster shot is recommended, and a person is no longer up to date on their recommended COVID vaccination. In order to be up to date, a person would need to get a booster shot to be considered up to date. Note: Number of boosters recommended and eligibility requirements by the CDC are subject to change.
  - 6. On-Site:** For this policy, an on-site location is considered on-campus if it takes place within WesternU’s facilities, buildings, or other affiliated locations.
  - 7. Religious Exception:** An exception to the COVID-19 vaccine mandate based on a person’s sincerely held religious belief, practice, or observance. A person who is granted an exception may be required to adhere to additional safety requirements for the health and safety of the campus community. WesternU is required to reasonably accommodate an employee’s religious beliefs, practices, or observances, unless doing so would cause an undue hardship.
  - 8. Medical Exemption:** An excuse from receiving COVID-19 vaccine due to medical contraindications or precautions recognized by the U.S. Food & Drug Administration or Centers for Disease Control and Prevention; or medical condition or disability. A person who is granted a Medical Exemption may be required to adhere to additional safety requirements for the health and safety of the campus community. WesternU is required to reasonably accommodate an employee’s medical condition or disability, unless doing so would cause an undue hardship or poses a direct threat to the safety of the employee or others in the workplace.
  - 9. Pregnancy Deferral:** An approved deferral of vaccination based on pregnancy. Pregnancy Deferral will extend throughout the term of the pregnancy and until the Covered Individual returns to work or instruction, as applicable.
  - 10. COVID-19 Prevention Measures:** An action, other than getting vaccinated or taking medicine, that members of the University community can take to help prevent or slow the spread of COVID-19 and other contagious illnesses. This includes, for example, wearing personal protective equipment or face coverings; asymptomatic (surveillance) and symptomatic COVID-19 testing; completing the daily symptoms screening survey; and quarantine and isolation orders in accordance with state and local health authorities.

## **Policy Information:**

As a graduate health sciences university, our employees and students should lead the way in promoting the shared responsibility of keeping themselves and their communities healthy and safe. Faculty, staff, residents, trainees, and students are required to participate in the COVID-19 Vaccination Program and must follow the appropriate procedures outlined below.

## **Procedures:**

- Faculty, staff, residents, trainees, and students must submit a copy of their vaccine and booster record to the Student-Employee Health Office (SEHO) as directed.
- Please refer to the [CDC COVID-19 Vaccine Boosters](#) for current recommendations on booster eligibility. Individuals not yet eligible for boosters must comply no later than 15 days after the recommended timeframe for receiving the booster dose.
- If a member of the WesternU community is seeking exemption from this requirement, they must submit the appropriate Medical Exemption, Religious Exception, or Pregnancy Deferral request form and send to SEHO via email to [stu-emphealth@westernu.edu](mailto:stu-emphealth@westernu.edu). Individuals with previously approved Medical Exemption, Religious Exception, or Pregnancy Deferral on file do not need to submit a new form for booster doses. Please allow a minimum of 20 business days for your request to be reviewed and responded to. In some instances, as part of the review process, a request form may need to be referred to an additional department for handling and review (i.e., employees – Human Resources; students – Center for Disability and Health Policy) and/or require additional information or follow-up. The review process will be considered, analyzed, and determined on a case-by-case basis by the respective reviewing department(s). While your request is pending, you must comply with the additional COVID-19 prevention measures listed below.
- Any unvaccinated person, including those with an approved exemption, exception, or deferral, will be subject to additional COVID-19 prevention measures as mandated by the Institutional Requirements document posted on the [COVID-19 Guidance](#) website. These additional measures include, but are not limited to, complying with personal protection equipment (PPE) requirements on all WesternU campuses and facilities, and to participating in COVID-19 testing as mandated by the university or your college/department, whichever is stricter.

All documentation submitted for the COVID-19 Vaccination Program will be maintained confidentially and stored in a separate confidential file apart from an individual's personnel records (employee) or educational records (student) in the Student-Employee Health Office.

**Program Enforcement:** All faculty members, staff, residents, trainees, and students who fail to submit the required COVID-19 vaccination and booster proof or applicable exemption, exception, or deferral documentation listed above by the established deadline, will be unable to be on-site in any capacity effective the day after the deadline, and subject to the following:

1. Students who remain out of compliance by the established deadline, will be subject to a hold, placed on a summary suspension, and referred to their respective College as a possible violation of Standards of Student Conduct for further administrative action, up to and including dismissal.

2. Faculty, staff, residents, and trainees who remain out of compliance by the established deadline, will be placed on an unpaid leave, and referred to Human Resources for further administrative action, up to and including termination and their supervisors will be notified.

### **Vaccines and Clinical Education**

Please note, WesternU's clinical affiliates reserve the right to deny an unvaccinated student and students without booster doses access to their facilities for the purposes of meeting the requirements of our curriculum, irrespective of whether the student has a WesternU authorized exemption, exception, or deferral on file. Should this occur, the student is advised to reach out to their college's rotations coordinator for assistance in locating another site, if available. Therefore, please be aware that a student's vaccination status may prevent students from entering hospital facilities or clinical sites, which may directly hinder a student's ability to complete their academic program successfully and/or on time.

Consistent with the Authorization for Release of Communicable Disease Clearance Information to Clinical Rotation Sites Form, if requested, your COVID-19 vaccine documentation or approved medical exemption, religious exception, or pregnancy deferral form may be provided to your clinical rotation site. If you do not allow this information to be provided to the various clinical rotation sites, a clinical rotation site can refuse to allow you to rotate through its facility.

**NOTE: Even if recommendations are from the CDC, we are held to the guidelines as issued by the local public health authorities, or whichever is most stringent.**

### **References:**

[Cal. Health & Safety Code Division 2, Chapter 2, Article 3.5](#)

[Oregon Health Authority Division 50, Chapter 333, OAR 333-050-0010 through 333-050-0140](#)

[CDC COVID Vaccination Program Planning Guidance](#)

[CDC Vaccine Recommendation Process](#)

**Related Forms:** [Religious Exception](#), [Medical Exemption](#), [Pregnancy Deferral](#)

**Responsible Department:** Student-Employee Health

**Contact:** Student-Employee Health

**Email:** [stu-emphealth@westernu.edu](mailto:stu-emphealth@westernu.edu)

**Origination Date:** 02/11/2021

**Review Dates:** 08/30/2021, 09/01/2021, 02/02/2022

**Next Review Date:** As needed.