OSHA’s COVID-19 Emergency Temporary Standard Vaccination, Testing and Face Covering Policy & Procedures

PURPOSE

The Occupational Safety and Health Administration (OSHA) has issued an emergency temporary standard (ETS) to minimize the risk of COVID-19 transmission in the workplace. Palmer College of Chiropractic will comply with the binding requirements established by OSHA’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501).

This policy summarizes the US Occupational Safety and Health Administration (OSHA) Emergency Temporary Standard (ETS). Additional and/or stricter obligations with respect to the COVID-19 Pandemic may apply, depending on local jurisdiction. Any applicable obligations or requirements as mandated by local or state Health Officers, Governors, State Agencies, counties or similar authorities will be enforced as applicable. In such a scenario, the College will send separate communications to the local, relevant campus.

SCOPE

1. This Policy applies to employees within the College community, which is defined as including the Davenport campus (Palmer College Foundation, d/b/a Palmer College of Chiropractic), West campus (Palmer College of Chiropractic West) and Florida campus (Palmer College Foundation, Inc., d/b/a Palmer College of Chiropractic Florida).

2. This Policy applies to all employees. This includes, full-time, part-time and adjunct faculty, staff, administrators, residents, and any other employee positions recognized by the College.

3. Exceptions include:
   a. employees who work exclusively from home.
   b. employees who work exclusively outdoors.
   c. employees who do not report to a workplace where other individuals are present.

DEFINITIONS

For the purposes of this Policy, the following terms shall have the meanings specified below:
1. The term “College” refers to Palmer College of Chiropractic, including operations on the Davenport campus; West campus; and Florida campus.

2. The term “Employee” is defined as individuals employed by the College including administrators, staff, and faculty. (Faculty members who are governed by separate collective bargaining agreements or faculty handbooks are also considered employees for the purpose of this policy.)

3. The term “Faculty member” is defined by the collective bargaining agreement or faculty handbook applicable to the individual faculty member employed on one of the three College campuses.

4. The term “Fully vaccinated” is defined as follows:

   An individual is considered fully vaccinated two weeks after completing primary vaccination with an FDA-approved COVID-19 vaccine, including any minimum recommended interval doses. For example:
   
   a. two weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines;
   
   b. two weeks after a single-dose vaccine, such as the Johnson & Johnson vaccine; or
   
   c. two weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series.

5. The term “Meeting space” is defined as any public space in which more than two people gather and cannot socially distance.

**ADMINISTRATIVE RULES**

**1. Requirement for Full Vaccination or Weekly Testing and Face Covering**

   Unless otherwise specified, all employees covered by this policy as a term and condition of employment are required to:
   
   a. be fully vaccinated as defined in this policy or
   
   b. undergo COVID-19 testing every seven days, provide proof of COVID-19 testing and results, and wear a face covering in the workplace as specified.
2. **Vaccination Status Reporting**

a. All employees are required to report their COVID-19 vaccination status and, if vaccinated, to provide acceptable proof of vaccination.

b. Acceptable proof of vaccination status is:
   
   1) a record of immunization from a health care provider or pharmacy.
   
   2) a copy of a 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).

c. 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 College will still accept the state immunization record as acceptable proof of vaccination.

d. Employees must provide truthful and accurate information about their COVID-19 vaccination status.

e. If an employee is unable to produce one of the above 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 forms of acceptable proof. The attestation for an employee who reports their vaccination status in this way must include:

   1) 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.”

2) To the best of their recollection, 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.

f. Vaccination status must be reported electronically using the COVID-19 Vaccination Status and Test Reporting Application provided by the College.

3. Weekly COVID-19 Testing

a. All employees who are not fully vaccinated are required to undergo COVID-19 testing once every seven days.

b. Tests administered at home will not meet this requirement. Valid tests may be procured from local pharmacies, clinics, county health departments or other such official COVID-19 testing sites.

c. Test results must be reported electronically using the COVID-19 Vaccination Status and Test Reporting Application provided by the College.

 d. The OSHA ETS does not require employers to pay for any costs associated with testing. The College will communicate any further guidance on costs from local jurisdictions to the relevant College campus.


a. All employees who are not fully vaccinated are required to provide proof of COVID-19 testing once every seven days using the electronic COVID-19 Vaccination Status and Test Reporting Application provided by the College.

b. Employees must provide truthful and accurate information about their testing results.

c. If an employee does not provide documentation of a COVID-19 test result as required by paragraph 1.b. of this section, the employee will be removed from the workplace until the employee complies.

5. Face Coverings

a. All employees who are not fully vaccinated are required to wear a face covering at all times in the clinics, in college classrooms, and all interior public meeting spaces, including Palmer-sponsored off-campus events with limited exceptions:
1) When alone in a workspace. This may include an office with a closed door or a cubicle that provides barriers between you and others.

2) When eating or drinking and socially distancing.

3) When seeking clarity in speaking during live lectures.

b. Face coverings must:

1) 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).

2) be a solid piece of material without slits, exhalation valves, visible holes, punctures, or other openings.

3) be secured to the head with ties, ear loops, or elastic bands.

3) fit snugly with no large gaps on the outside of the face and worn properly covering the nose, mouth, and chin.

c. Face shields, gaiters, face masks with exhalation valves, and bandanas are not permitted as replacements for appropriate face coverings.

d. 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 this definition and 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.

6. **New Employees**

All new employees are required to comply with the requirements outlined in this policy as soon as practicable 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.

7. **Confidentiality and Privacy**

All medical information collected from individuals, including vaccination information, test results, and any other information obtained because of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.

8. **Exposure to COVID-19**

Regardless of vaccination status, an employee who suspects they have been exposed to COVID-19, or have tested positive, shall submit the “Potential Exposure Form” and/or the “Positive Diagnosis Form” immediately as specified by the College. A College representative
will contact the employee who suspects they have been exposed to COVID-19 or have tested positive regarding isolation/quarantine protocols.

9. **Positive COVID-19 Test or Diagnosis**

When an employee has received a positive COVID-19 test or has been diagnosed with COVID-19 by a licensed healthcare provider, the employee is not required to undergo COVID-19 testing as required under section 1(b) of this policy for 90 days following the date of their positive test or diagnosis.

10. **Self-Monitoring and COVID-19 Related Absences**

Palmer requires all employees to self-monitor for signs and symptoms of COVID-19. Employees who experience the onset of symptoms while at work are required to notify their manager and Human Resources and leave the workplace.

11. **Noncompliance with This Policy**

a. If good faith efforts have been made to comply with this policy but the employee has not met requirements due to circumstances beyond the employee’s control, the employee may contact Human Resources for possible available options (e.g., paid time off, unpaid time off, work remotely).

b. Should an employee wish to request accommodation due to a sincerely held religious belief, medical necessity that would require a delay in vaccination, the vaccine is medically contraindicated or due to a qualifying disability, that employee should notify Human Resources.

c. Without exception, all employees are required to comply with this policy. Non-compliance may be subject to disciplinary action up to and including termination of employment.

### Additional Information

**ASSOCIATED POLICIES, PROCESSES AND/OR PROCEDURES**

This Policy is supplemented below. It is the responsibility of all employees to know and comply with additional associated policies and procedures as supplemented.
POLICIES

Institutional policies are supplemented by provisions that are applicable to all institutional policies. It is the responsibility of all employees to know and comply with these standards.

➢ Standard Provisions Applicable to All Institutional Policies

PROCESSES AND/OR PROCEDURES

➢ COVID-19 Vaccination Status Reporting and Testing Application
➢ COVID-19 Exposure, Testing Workflow

FORMS/INSTRUCTIONS

➢ Potential Exposure Form
➢ Positive Diagnosis Form

OTHER RELATED INFORMATION

➢ COVID-19 Updates and Announcements
➢ Safety and Security COVID Resources

CONTACTS

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HISTORY

Adopted: ........................................................................................................................ January 10, 2022

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