



National University System Vaccination Requirement Guidelines

Purpose:

The National University System, which is formed by National University, Northcentral University, City University of Seattle, and System Management Group, hereinafter referred to collectively and respectively as “National University System” or “Organization,” believes strongly in maintaining the health and welfare of its staff, faculty, and students. Each university has safety policies outlining vaccine expectations for the university community. These guidelines are authorized under those respective Policies. Vaccination is a vital tool to reduce the presence and severity of a highly infectious disease like COVID-19 at the workplace, in our communities, and throughout the United States. National University System has adopted these guidelines on vaccination requirements to safeguard the health of our staff, faculty, and students from the hazard of COVID-19.

Scope:

These COVID-19 Vaccination Requirement Guidelines apply to all employees of our Organization within the United States or traveling to the United States. This also applies to employees who are assigned as remote but are requested to travel to a physical location including, but not limited, to headquarters, a satellite location, designated business meeting location or to a partner and/or affiliate location, on behalf of the Organization (other than an organization sponsored event at a 3rd party, site-see below). These guidelines also apply to students attending courses on campus or attending another physical location for the purpose of engaging in practicum or internship education as part of their program of study. This policy does **not** apply to employees or students who do not or are not required to report or learn at a physical location where other individuals (such as coworkers, students, vendors, or business partners) are present, except as stated herein; or employees and students who work or participate in courses exclusively from home.

Employees and students without an expectation of coming to a physical location, but nonetheless will be present at a physical location, are required to produce a negative COVID-19 test within 48 hours prior to arrival and participation at physical location.¹ Employees and students attending an organization sponsored event at a 3rd party site, (e.g., graduation) must follow the applicable venue or state specific COVID-19 protocols.

¹ For participation in graduation, the Organization will follow state guidelines for entry and participation. The Organization reserves the right to modify this requirement at any time in its sole discretion.

All employees or students covered by this policy are required to be fully vaccinated² as a term and condition of employment or classroom attendance at our Organization. For example, this includes two (2) weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two (2) weeks after a single-dose vaccine, such as the Johnson & Johnson vaccine, or two (2) weeks after the second dose of any combination of two doses of different COVID-19 vaccines as part of one primary vaccination series and an available booster as identified by the CDC or state health department. Under these circumstances, all employees and students are required to report their vaccination status and to provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees not in compliance with this policy will be subject to discipline, including, but not limited to, termination. Students may not be permitted to attend classes and activities onsite, which may delay their program completion.

Employees and students may request an exception from this vaccination requirement policy if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees and students 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 benefits department within Human Resources or Student Accessibility Services at their organization. All such requests will be handled in accordance with applicable laws and regulations.

Overview and General Information

*All employees and students must be fully vaccinated no later than **February 28, 2022**.*

*To be fully vaccinated by **February 28, 2022**, the university community must:*

- *Obtain the first dose of a two-dose vaccine no later than **January 17, 2022**; and the second dose no later than **February 14, 2022**; or*
- *Obtain one dose of a single dose vaccine no later than **February 14, 2022**.*

Employees and students will be considered fully vaccinated two (2) weeks after receiving the requisite number of doses of a COVID-19 vaccine and a booster if applicable. An employee or student will be considered partially vaccinated if they have received only one dose of a two-dose vaccine.

Vaccination Status and Acceptable Forms of Proof of Vaccination

*All vaccinated employees and students are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted via the Human Resources Benefits department or Student Accessibility Services. **Employees and students will be***

² As defined by the Center for Disease Control and Prevention (CDC) or state departments of health if the department has a higher standard for fully vaccinated.

receiving a subsequent communication identifying when vaccination proof or exemption requests will be accepted by the Organization. Submissions before the communication date will not be accepted.

Acceptable proof of vaccination status is:

1. The record of immunization from a healthcare 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 healthcare professional(s) or clinic site(s) administering the vaccine(s).

Proof of vaccination generally should include:

1. The subject's name
2. The type of vaccine administered
3. The date(s) of administration and
4. The name of the healthcare 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, and in those circumstances the Organization will still accept the state immunization record as acceptable proof of vaccination.

If an employee or student 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 or student 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 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 or student 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 healthcare professional(s) or clinic site(s) administering the vaccine.

Employees and Students must inform the Organization of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

Vaccination Status	Instructions	Deadline
Employees/Students who are fully vaccinated.	Submit proof of vaccination that indicates full vaccination.	February 28, 2022
Employees/Students 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.	January 17, 2022
Employees/Students who have not yet been vaccinated.	Submit statement that you are unvaccinated.	February 28, 2022

Supporting COVID-19 Vaccination

Employee Benefits: 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. Employees who have no sick leave will be granted up to two days of additional sick leave immediately following each dose if necessary.

Employees requesting time to obtain the COVID-19 vaccine and its booster or sick leave to recover from side effects should contact their supervisor notifying them of their absence and contact benefits to inquire about sick leave available.

Employee and Student Notification of COVID-19 Diagnosis and Removal from the Workplace or Classroom

The Organization will require employees or students to promptly notify Human Resources or Student Accessibility Services, as applicable, when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.

Employees must promptly notify their supervisor if they begin to experience cold, flu or other symptoms while at work or at home if the employee is scheduled to begin work within 72 hours.

Employees should contact the benefits department within Human Resources or Student Accessibility Services if they have questions regarding leave eligibility due to illness.

Medical Removal from the Workplace

The Organization has also implemented a policy for keeping COVID-19 positive employees and students from the workplace or classroom in certain circumstances. The Organization will immediately remove an employee or student from the workplace or classroom 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 or Classroom Criteria

For any employee or student removed because they are COVID-19 positive, the Organization will keep them removed from the workplace or campus until the employee or student 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 or student chooses to seek an NAAT test for confirmatory testing; meets the return to work criteria in the CDC's "Isolation Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.

Under the CDC's "[Isolation Guidance](#)," asymptomatic students may return to campus once ten (10) days have passed since the positive test, and asymptomatic 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 or student has severe COVID-19 or an immune disease, the Organization will follow the guidance of a licensed healthcare provider regarding return to work or the classroom.

COVID-19 Testing

If an employee or student covered by this policy is not fully vaccinated (e.g., if they are granted an exception from the vaccination requirement because the vaccine is contraindicated for them), the employee or student will be required to comply with this policy for testing.

Employees and students who report to the workplace or campus at least once every seven (7) days:

(A) must be tested for COVID-19 at least once every 7 days; and

(B) must provide documentation of the most recent COVID-19 test result to Human Resources or Student Accessibility Services no later than the 7th day following the date on which the employee last provided a test result.

Any employee or student who is expected to, but does not report to the workplace or classroom during a period of seven (7) or more days (e.g., for employee: if they were teleworking for two (2) weeks prior to reporting to the workplace; for student: missing more than two (2) weeks from onsite course):

(A) must be tested for COVID-19 within 7 days prior to returning to physical location; and

(B) must provide documentation of that test result to Human Resources or Student Accessibility Services upon return to the workplace or campus.

If an employee or student does not provide documentation of a negative COVID-19 test result as required by this policy, they will be removed from the workplace or campus until they provide a test result.

Employees or students 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.

Face Coverings

If an employee or student covered by this policy is not fully vaccinated (e.g., if they are granted an exception from the mandatory vaccination requirement because the vaccine is contraindicated for them), our Organization will require the employee or student 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 around the edges 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 and students 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 other provisions which may be 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 Organization's requirements for face coverings:

1. When an employee or student is alone in a room with floor to ceiling walls and a closed door.
2. For a limited time, while an employee or student is eating or drinking or for identification purposes in compliance with safety and security requirements.
3. When an employee or student is wearing a respirator or facemask.
4. Where the organization has determined that the use of face coverings is infeasible or creates a greater hazard (e.g., when it is important to see the wearer's mouth for reasons related to their job duties, when the work requires the use of the wearer's uncovered mouth, or when the use of a face covering presents a risk of serious injury or death to the employee or student).

Failure to follow Guidelines:

Employees who fail to follow these Guidelines may face discipline, up to and including termination. Students who fail to follow these guidelines may not be permitted to continue with their course and/or face discipline for failing to follow university protocols.

New Hires:

All new employees are required to comply with the vaccination 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.

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.

Severability

These Guidelines are meant to conform to the latest guidance and lawfully enforceable federal, state, and local statutes regarding COVID-19 vaccination. To the extent any of these Organizational Guidelines become unenforceable, only that specific section will not be operable and will not invalidate the entirety of these guidelines unless otherwise determined.

The Organization reserves the right to modify these Guidelines at any time. These Guidelines are effective as of December 24, 2021, until further notice and will be reviewed every six (6) months.

Questions:

Please direct any questions regarding this policy to the Benefits department, benefits@nu.edu, within Human Resources.