



Memorandum

TO: All Guild Staff Members
FROM: Amy C. Sousa, Chief Executive Officer
RE: Guild to Follow OSHA COVID Vaccination/Testing Mandate for Staff
DATE: December 30, 2021

Effective January 3, 2022, The Guild for Human Services will alter its COVID-19 surveillance testing program for staff to align with the OSHA ETS. Weekly COVID-19 surveillance testing for unvaccinated employees will remain a condition of employment. Those employees who provide documentation of full vaccination shall not be required to undergo weekly surveillance testing as set forth herein. This Policy applies to all staff members. Please see the Human Resources Department with any questions.

Policy

All staff members are required to report their COVID-19 vaccination status and, if vaccinated, provide proof of vaccination to the Human Resources Department. Employees must provide truthful and accurate information about their COVID-19 vaccination status. New hires will be required to report and provide proof of their vaccination status within the first two weeks of hire.

Those staff members who demonstrate full COVID-19 vaccination shall not be required by The Guild to conduct weekly surveillance testing. Staff members currently 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. To the extent that the definition of fully vaccinated is revised to include booster shots, staff members will be required to obtain booster shots in accordance with applicable guidance to remain exempt from weekly surveillance testing

Any staff member who cannot provide documented evidence of full vaccination shall continue with weekly surveillance testing for COVID-19 as a condition of employment per OSHA ETS. Surveillance testing will be conducted weekly at The Guild's headquarters and at residences at no expense to staff. If you have been out of work for any reason in excess of seven days, you

must speak with the Human Resources Department to discuss plans for testing before you can resume work.

Any staff member who is unable to be vaccinated due to medical contraindications, medical necessity requiring delay in vaccination, a disability or sincerely held religious belief, may make an application for reasonable accommodation in writing to the Human Resources Department no later than January 31, 2022 or within two weeks of hire, whichever comes first. The Guild will evaluate all requests for reasonable accommodation in accordance with applicable law.

Employees Who Test Positive or are Symptomatic

The Guild will continue to conduct close contact tracing for unvaccinated staff and require that all staff members receive symptom-based screening for COVID-19 as directed by public health officials. Any staff member who tests positive for COVID-19 shall provide immediate notice to The Guild and shall refrain from entering the workplace until they meet the [criteria set by the Centers for Disease Control](#) (CDC) to discontinue isolation and return to work.

Currently, asymptomatic employees may return to work once five (5) days have passed since the positive test, and symptomatic employees may return to work after all the following are true:

- a) At least five (5) days have passed since symptoms first appeared, and
- b) At least 24 hours have passed with no fever without fever-reducing medication, and
- c) 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).

Employees with a more severe case of COVID-19 might need to remain out of work for a longer duration.

Other COVID-19 Protocols

Employees should take note of their rights and responsibilities under the OSHA Emergency Standard:

- a) [Workers' Rights under the COVID-19 Vaccination and Testing ETS](#)
- b) [Information for Employees on Penalties for False Statements and Records](#)

Please note that all other [COVID protocols](#) remain in place, including The Guild's organization-wide mandate that face coverings be worn by anyone indoors and within six feet of another person, subject to any reasonable accommodations.

Proof of Vaccination

The Guild will presume that an employee is unvaccinated unless the employee provides documentation of full vaccination to the Human Resources Department. Acceptable proof of vaccination status is as follows:

- a) The record of immunization from a health care provider or pharmacy;
- b) A copy of the COVID-19 Vaccination Record Card;
- c) A copy of medical records documenting the vaccination;
- d) A copy of immunization records from a public health, state, or tribal immunization information system; or

- e) 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);
- f) In instances where an employee is unable to produce acceptable proof of vaccination under paragraphs (a) through (e) of this section, a signed and dated statement by the employee must be produced:
 - Attesting to their vaccination status (fully vaccinated or partially vaccinated);
 - Attesting that they have lost and are otherwise unable to produce proof required by this section; 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 should, to the best of their recollection, include the following information in their attestation: 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).

All medical information collected from staff members, including vaccination information, test results, and any other information obtained as a result of testing, will be maintained by the Human Resources Department and treated in accordance with applicable laws and policies on confidentiality and privacy.

Time off to get Vaccinated

We will provide up to four hours of paid sick leave, per dose, for employees who need to be absent from work to get vaccinated. We also will provide reasonable paid sick leave, up to two workdays immediately following each dose, if you have side effects from the COVID-19 vaccination that prevent you from working. Any paid time off for this purpose will run concurrent with the Massachusetts COVID-19 Temporary Emergency Paid Sick Leave Program, or any other applicable law.

Violations of this Policy

Employees who violate this Policy will be subject to discipline, up to and including termination of employment.