

# MACOMB COUNTY HUMAN RESOURCES POLICY

## VACCINATION AND TESTING POLICY

### 1. **Purpose**

In accordance with and solely as a result of the Office of Head Start (OHS), Administration for Children and Families (ACF), Department of Health and Human Services (HHS) mandate, (the Mandate), the County must determine the COVID-19 vaccination status of each staff member and provide for a weekly testing program as applicable. To facilitate compliance with the Mandate, The Charter County of Macomb adopts the following Policy.

### 2. **Scope**

This policy applies to all Head Start program staff. The definition of *staff* in §1305.2 is "paid adults who have responsibilities related to children and their families who are enrolled in programs." Consistent with that definition, "all staff" refers to all staff who work with enrolled Head Start children and families in any capacity regardless of funding source. The term "Head Start" is inclusive of Head Start, Early Head Start, and Early Head Start-Child Care Partnerships.

### 3. **Vaccination Requirement**

All Head Start staff, certain contractors, and volunteers in classrooms or working directly with children are to be fully vaccinated for COVID-19, unless certain exemptions as discussed below, are sought and granted; and for those granted an exemption, they must submit to weekly testing for current SARS-CoV-2 infection. Fully vaccinated is defined as a person's status 2 weeks after completing primary vaccination with a COVID-19 vaccine with, if applicable, at least the minimum recommended interval between doses.

#### a. Vaccination Status

The County has provided for the tracking of vaccination status through an on-line submission program. Staff members will be provided a link to this survey to complete. The survey will allow for vaccination records to be uploaded as well as exemption requests and testing protocols as needed.

b. **Acceptable Vaccination Records**

- 1) A copy of the record of immunization issued by 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 reflecting the following information:
  - a. The type of vaccine administered;
  - b. The date(s) the vaccination was administered, and
  - c. The name of the healthcare professional(s) or clinic site(s) administering the vaccine.
  - d. Vaccination documentation provided to the County will be treated as protected health information and will be disclosed only as provided by law.

4. **Exemptions**

Exemptions from the vaccine mandate are provided for those for whom a vaccine is medically contraindicated, for whom a medical necessity requires a delay in vaccination, or who are legally entitled to an accommodation with regard to the COVID-19 vaccination requirement based on an applicable Federal law (generally religious exemption). Those individuals granted exemptions must undergo testing at least weekly for current SARS COV-2 infection.

The process to request an exemption is provided through the County's on-line Vaccine Status program.

5. **Weekly Testing**

The County will provide a means for exempted staff to conveniently and efficiently test each week. For those staff granted an exemption, the following COVID-19 testing requirements must be followed:

- a) An employee who appears in the workplace at least once each week must be tested at least once every 7 days and submit the test result documentation to the County no later than 12 hours following the last test date.
- b) An employee who, for any reason, is absent from his or her workplace for 7 or more consecutive days must be tested within 7 days prior to returning to the workplace and must submit proof of the test results documentation to the County upon the employee's return to the workplace.

- c) An employee who fails to provide documentation as required in (a) or (b) above, must be removed from the workplace until the employee provides the required test result documentation. The employee must use their time off bank(s) while unable to report to work for their failure to test or upload their test results into the online testing program.
- d) An employee who tests positive for COVID-19 must not enter the workplace and they must also complete the County's *Employee Exposure Notification Form* to seek return to work guidance.
- e) If an employee tests positive while in the workplace they are to immediately contact their supervisor, gather their belongings and leave the workplace and await further instructions.
- f) Employees who work exclusively at home or another remote location need not comply with either option unless or until they return to the workplace.

6. **Record Collection, Keeping, and Maintenance.**

The federal mandate orders the County to determine the vaccination status of each employee. To facilitate this determination, the mandate also orders the County to require employees to provide proof of COVID-19 vaccination and testing in the forms detailed above, and dictates that the County maintain the following records:

- a) A copy of the COVID-19 vaccination records submitted by each employee electing the vaccination option as detailed above;
- b) A collective roster of all employees and their individualized vaccination status;
- c) A copy of the COVID-19 test results documentation submitted by employees approved for an exemption and submitting to the weekly testing as detailed above;
- d) A copy of all COVID-19 test results documentation submitted by an employee subsequent to the employee testing positive or received a positive diagnosis from a licensed healthcare provider;

All COVID-19 vaccination and testing documentation submitted to and maintained by the County shall be treated as protected health information and may not be disclosed except as required by the federal mandate or other federal law.


7. **Non-compliance**

Employees who fail to comply with the provisions of this policy will be referred to Human Resources and Labor Relations for consultation.

8. **Additional County Obligations**

The County will comply with all prevailing law prohibiting discrimination and retaliation.

  
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Office of County Executive

  
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Date

Approved: March 1, 2022