



## **COVID-19 Vaccination Requirements HR 1000.10**

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Policy Manual: Human Resources	Policy Section: Health and Safety
Policy Owner By Title: Chief Human Resources Officer	
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### **POLICY:**

Consistent with CareFirst's role as a leading healthcare organization, it is our responsibility to do our part to slow the spread of COVID-19 and protect the health and well-being of our members, workforce, business partners, and communities. To fulfill this responsibility, CareFirst requires Covered Individuals along with Visitors entering CareFirst facilities to be Fully Vaccinated against the COVID-19 virus. Limited exemptions are described in this policy.

This policy is based on guidance from the U.S. Centers for Disease Control and Prevention (CDC) and local jurisdictions and contractual obligations as applicable. It is intended to be interpreted and implemented in compliance with all current applicable laws to the extent not explicitly incorporated herein.

### **PURPOSE:**

The purpose of this policy is to establish consistent standards and guidelines for ensuring compliance with or exemption from the Company's requirement that all Covered Individuals be Fully Vaccinated against the COVID-19 virus.

### **APPLIES TO:**

This policy is intended to apply to:

- ☒ Employees
- ☒ Contingent Workers
- ☒ Visitors
- ☒ Members of the Boards of Directors

of CareFirst, Inc. and all affiliated, subsidiary, and related companies unless otherwise stated. Collectively, these individuals may be referred to as "you" throughout the policy.

## DEFINITIONS:

**Covered Individual:** All Employees including those who work remotely regardless of their physical work location; Contingent Workers and Visitors who enter CareFirst facilities and/or engage in-person with community or business partners on behalf of CareFirst; and Members of the Boards of Directors.

**Fully Vaccinated:** Fully Vaccinated means the most current definition ascribed to the term by the U.S. Center for Disease Control and Prevention (CDC) and includes all applicable local and contractual requirements.

**Medical Exemption:** An Employee's or Board member's exemption from the Company's COVID-19 vaccination requirement based on a request from the individual supported by a written certification provided by their licensed, treating medical provider (e.g., physician, nurse practitioner, physician's assistant).

**Religious Exemption:** An Employee's or Board member's exemption from the Company's COVID-19 vaccination requirement based on a request from the individual that is based on their sincerely held religious beliefs, practices, and/or observances. Personal preferences, as well as beliefs based on social, political, or economic philosophies, do not qualify for Religious Exemption.

## GENERAL:

### 1.0 Attestation of Compliance

- ☐ Being Fully Vaccinated against the COVID-19 virus is a condition of employment, assignment/engagement, or appointment for Covered Individuals.
- ☐ Employees must provide Proof of Compliance using the designated system and forms in accordance with the Company's established applicable due date.
- ☐ New Covered Individuals must be Fully Vaccinated by their first day of employment, assignment/ engagement, or appointment.
- ☐ Covered Individuals who do not maintain status as Fully Vaccinated by established due dates and, if applicable, who do not qualify for a Medical or Religious Exemption, are subject to termination of employment or assignment/engagement.
- ☐ Employees whose employment is terminated because they did not satisfy the vaccination requirement by the established applicable due date or who do not qualify for a Medical or Religious Exemption are not eligible for severance.
- ☐ People leaders are responsible for:
  - Ensuring their Visitors are aware of the Company's COVID-19 vaccination requirement prior to entering a CareFirst facility.
  - Communicating to Contingent Workers if they are or will be expected to enter CareFirst facilities and/or engage in person with community or business partners on

behalf of CareFirst at any time during their assignment/ engagement. This expectation must also be shared with Contingent Labor Sourcing and Management.

- Contacting Contingent Labor Sourcing and Management immediately upon learning that a Contingent Worker who is expected to be onsite is in violation of this policy.

## **2.0 Medical and Religious Exemptions for Employees and Board Members**

CareFirst is committed to creating an inclusive and supportive environment for its workforce. As such, CareFirst will work to understand the needs of Employees and Board members who seek a Medical or Religious Exemption. However, exemptions are not guaranteed. Exemption requests and related documentation will be kept confidential and only shared with those who have a business need to know.

- Employees should work directly with their people leader and/or HR Generalist or Business Partner for guidance on how to request an exemption. At any point during the process HR may engage in an interactive dialogue to understand your Medical or Religious Exemption request. This may involve asking questions or requesting additional information.
  - Medical and Religious Exemption requests must be submitted in accordance with the Company's established procedures and applicable due dates.
  - Medical and Religious Exemptions are based on a determination of current public health and workplace conditions. As a result, Medical and Religious Exemptions are valid for one year only. Employees and Board members may be required to follow the exemption request process on an annual basis.
  - Those who request a Medical Exemption are responsible for working with their medical provider(s) to ensure the Medical Exemption Request form is completed fully which includes obtaining the provider's signature. Medical stamps are not acceptable.
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- ☐ Employee and Board member requests for exemption will be reviewed on a case-by-case basis by CareFirst and/or CareFirst's third party-leave/disability vendor, to determine if the request can be granted provided it is reasonable and does not create an undue hardship for the Company. Medical or Religious Exemptions also must not pose a direct threat to the health or safety of others and/or to the individual.
  - ☐ You may be contacted by CareFirst's third-party leave/disability vendor if additional medical information is needed to evaluate your Medical Exemption request. Your request will be sent to CareFirst for further review if CareFirst's third-party leave/disability vendor is unable to make a determination. CareFirst and CareFirst's third-party leave/disability vendor will protect the confidentiality of your request and medical information.
  - ☐ Employees and Board members with approved Medical or Religious Exemptions must comply with additional health and safety protocols. These protocols are subject to change as existing government guidance changes; the protocols may vary between CareFirst offices in accordance with local jurisdiction guidance.

- ❑ You will be notified of the current additional protocols at the time when you are advised of the determination of your request. Failure to follow these additional health and safety protocols may subject you to disciplinary action, up to and including termination, and/or loss of access privileges.
- ❑ Employees whose Medical or Religious Exemption request is denied will be notified by CareFirst. CareFirst will communicate the decision to you along with the reason for the denial. You will then have 45 calendar days to become Fully Vaccinated and provide Proof of Compliance
- ❑ You may request a Medical or Religious Exemption without fear of retaliation. If you believe that you have been treated in a manner not in accordance with this policy, please immediately notify the Company by contacting Human Resources or the Compliance & Ethics Office. Refer to *HR 200.05 Illegal Retaliation* and *HR 200.06 Accommodations for Disabilities and Pregnancy-Related Disabilities or Limitations* for more information.

### 3.0 Time Off

- ❑ **For Vaccinations:**
  - CareFirst will provide paid leave in accordance with local, state and federal laws.
  - Please refer to the Inside CareFirst COVID-19 Resource Page for specific amount of time allotted.
  - Contingent Workers are expected to communicate with their CareFirst point of contact to coordinate schedules and coverage.
  - People leaders are expected to communicate any specific departmental procedures to their Employee and Contingent Workers and to allow scheduling flexibility whenever possible.
- ❑ **For Recovery from Vaccinations:**
  - Employees who experience symptoms after receiving a COVID-19 vaccination shot may utilize Paid Time Off (PTO) as needed to recover. Employees should contact their people leader to discuss their need for PTO and coordinate coverage.
  - Contingent Workers who experience symptoms after receiving a COVID-19 vaccination shot should contact their employer to discuss their need for time off to recover. They should also alert their CareFirst point of contact.
  - Please refer to the Inside CareFirst COVID-19 Resource Page periodically for changes to resources.
  - CareFirst complies with all local, state and federal requirements.

### PROCEDURES:

N/A

### RESPONSIBILITY:

The interpretation and implementation of this policy has been assigned to the Chief Human Resources Officer who will publish further procedures and guidelines as required. Associates who have questions concerning this policy are encouraged to contact Human Resources.

#### **VIOLATIONS:**

Violations of this Policy may subject you to disciplinary action, up to and including termination, and/or loss of access privileges.

#### **EXCEPTIONS:**

N/A

#### **LEGAL REFERENCE OR CITATION:**

N/A