



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

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Policy Manual: Human Resources		Policy Section: Health and Safety
Policy Owner By Title: Chief Human Resources Officer		
Effective Date: 09/12/2021 Last Review Date: 09/12/2021		

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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 health authorities, 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:

- Associates
- 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 Associates 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).

**Medical Exemption:** An Associate'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 Associate'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

- 1.1 Being Fully Vaccinated against the COVID-19 virus is a condition of employment, assignment/engagement, or appointment for Covered Individuals.
- 1.2 Covered Individuals must complete the appropriate Attestation of Compliance form using the designated system and 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.
- 1.3 CareFirst may require Covered Individuals who declare on their Attestation of Compliance form that they are Fully Vaccinated to provide documentation of their vaccination status (e.g., a copy of their COVID-19 vaccination record). Failure to do so may support the Company's conclusion that Covered Individual did not accurately attest to their vaccination status. This may result in disciplinary action including termination for Associates or termination of assignment/engagement for Contingent Workers.
- 1.4 Covered Individuals who are not Fully Vaccinated by the established applicable due date and, if applicable, who do not qualify for a Medical or Religious Exemption are subject to termination of employment or assignment/engagement.

Associates 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.

1.5 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 Associates 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 Associates 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 need to know.

2.1 Associates who wish to request an exemption must either complete the Religious Exemption portion of CareFirst's Attestation of Compliance form or CareFirst's Medical Exemption Request form. Medical information must not be included on the Attestation of Compliance form.

- 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. Associates 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.

2.2 Associate 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.

2.3 Human Resources may be engaged at any point during this process to facilitate an interactive dialogue to understand your Medical or Religious Exemption request. This may involve asking questions or requesting additional information.

2.4 Associates 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.

2.5 Associates 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 sign an attestation as such.

2.6 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**

#### **3.1 For Vaccinations:**

- Associates are allowed up to four hours of paid time for each shot required by the COVID-19 vaccine they receive in order to become Fully Vaccinated.
- Associates are not required to use Paid Time Off (PTO) if their vaccination appointment is during scheduled work hours.
- Hourly Associates should record the time they need to attend their appointment as normal work hours in CareFirst's timekeeping system.
- Associates are expected to communicate with their people leader to coordinate schedules and coverage.
- Contingent Workers will be paid up to four hours for each shot required by the vaccine they receive in order to become Fully Vaccinated if their vaccination appointment is during scheduled work hours.
- 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 Associates and Contingent Workers and to allow scheduling flexibility whenever possible.

### **3.2 For Recovery from Vaccinations:**

- Associates who experience symptoms after receiving a COVID-19 vaccination shot may utilize Paid Time Off (PTO) as needed to recover. Associates 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.

### **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