

# COVID-19 Vaccination, Testing and Face Covering Policy for Internal and Contingent Employees

## Overview

### Purpose:

JURISolutions, Inc. (“JURISolutions”) has adopted this policy for vaccination, testing and face covering in order to comply with the Occupational Health and Safety Administration’s Emergency Temporary Standard on Vaccination and Testing (29 CFR 1910.501) (the “ETS”). The ETS requires all private employers with more than 100 employees (such as JURISolutions) to adopt a policy that (i) requires vaccination of all employees or (ii) requires masking and weekly testing of employees who are unvaccinated.

Due to the nature of our business, clients may impose additional and more stringent requirements that may be applicable to contingent employees.<sup>1</sup> Additionally, state or local government mandates governing an employee’s particular work location may also impose more stringent requirements. If you are subject to a more stringent requirement, you will be notified by JURISolutions.<sup>2</sup>

### Scope and Exceptions:

This COVID-19 Policy on vaccination, testing, and face covering use applies to all internal and contingent employees of JURISolutions, except for (1) employees who do not report to a workplace where other individuals (such as coworkers or customers) are present, (2) employees while working from home and (3) employees who request and are granted an exception for medical or religious reasons (see below).

***We expect all that all or most of our internal employees and many of our contingent employees will qualify for the working from home exception.***

Note that employees who generally work from home may be required to, or may decide to, from time-to-time go into the office or other JSL or client work location, attend business meetings, events or conferences or engage in business related travel. In these cases, the working from home exception will not apply and employees who are not fully vaccinated must be tested within 7 days of each event and wear an appropriate mask while in the presence of other people.

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<sup>1</sup> Contingent employees for purposes of this policy also includes independent contractors and consultants who are outsourced by JURISolutions to its clients.

<sup>2</sup> Contingent employees working directly or indirectly (through assignment to a client who is a government contractor or sub-contractor) for Federal government clients are subject to a Presidential Executive Order (the “Executive Order”) that requires these employees to be vaccinated whether or not they are working from home or onsite at a client location. Masking and testing is not an option for employees covered by this Executive Order. However, enforcement of the Executive Order is currently stayed while it is subject to legal challenges. For now, employees in this category are still subject to the less restrictive requirements of the ETS and any specific client-imposed and/or state and local requirements.

All employees are encouraged to be fully vaccinated. Employees 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.<sup>3</sup> **Employees who are not fully vaccinated and who are not subject to one of the exceptions described in section will be required to provide proof of weekly COVID-19 testing and wear a face covering at the workplace. This includes contingent employees working onsite at client locations.**

As noted, contingent employees may also be subject to additional, and stricter, requirements imposed by the client to whom they are assigned. In such cases, contingent employees must follow all vaccination requirements and procedures as are established by the client, to the extent stricter than those imposed by this policy.

All employees are required to report their vaccination status and, if vaccinated, provide proof of vaccination. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if not fully vaccinated, their testing results. Employees not in compliance with this policy will be subject to discipline, up to and including termination of employment.

***Exception for Medical or Religious Reasons.*** Employees may be legally entitled to a reasonable accommodation if they cannot be vaccinated and/or wear a face covering 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. Since this policy does not mandate vaccinations, there is no need to apply for a reasonable accommodation from the vaccination part of this policy unless an employee also intends to apply for a reasonable accommodation to the face covering and testing part of this policy or, in the case of a contingent employee, for a reasonable accommodation to a more stringent client-imposed requirement.

Requests for exceptions and reasonable accommodations must be initiated by contacting Christine Durham in Human Resources. All such requests will be considered on a case-by-case basis by JURISolutions (and in consultation with, and in consideration of the needs of, affected clients for contingent employees) and handled in accordance with applicable laws and regulations.

## Procedures

### Overview

***Vaccination and/or Face Coverings.*** Any JURISolutions employee that chooses to be vaccinated against COVID-19 must be fully vaccinated no later than January 10, 2022. Any employee who is not fully vaccinated by January 10, 2022 will be immediately subject to the face covering requirements of this policy and will be subject to the testing requirements of this policy effective February 9, 2022. Employees who did not receive their second dose of the Pfizer or Moderna vaccines, or their first dose

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<sup>3</sup> The ETS does not currently require an employee to have received a booster dose of any vaccine to be considered fully vaccinated.

of the Johnson & Johnson vaccine, by December 27, 2021 will not be considered fully vaccinated by January 10, 2022. However, if these employees take their second dose of the Pfizer or Moderna vaccines, or their first dose of the Johnson & Johnson vaccine, by January 26, 2022, these employees can avoid the mandatory testing requirements that become effective February 9, 2022.

Employees are responsible for scheduling their own vaccination appointments. More information can be found at [vaccines.gov](https://www.vaccines.gov).

**Testing.** All employees who are not fully vaccinated as of February 9, 2022 will be required to undergo regular COVID-19 testing and to continue to wear a face covering when in the workplace. Policies and procedures for testing and face coverings are described below in the relevant sections of this policy.

Employees who become fully vaccinated after the dates above will no longer be subject to the Testing requirements above once they are fully vaccinated.

### **Vaccination Status and Acceptable Forms of Proof of Vaccination**

**Vaccinated Employees.** All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status can be submitted via email to Christine Durham ([cdurham@jsl-hq.com](mailto:cdurham@jsl-hq.com)).

Acceptable proof of vaccination status is:

1. The record of immunization from 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 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).

Proof of vaccination generally should include the employee's name, the type of vaccine administered, the date(s) of administration, and the name of the health care 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; in those circumstances JURISolutions will still accept the state immunization record as acceptable proof of vaccination.

If an employee 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 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 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 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 health care professional(s) or clinic site(s) administering the vaccine.

Employees who have previously provided proof of being fully vaccinated prior to the adoption of this Policy do not need to resubmit such proof, even if such proof did not fully comply with the above requirements.

**All Employees.** All employees, both vaccinated and unvaccinated, must inform Christine Durham of their vaccination status by January 4, 2022 per previous communications to employees. New employees must inform Christine Durham of their vaccination status at the time of hire.

### **Time Off for COVID-19 Vaccination**

An employee will receive up to four hours of paid time off per dose to travel to the vaccination site, receive a vaccination, and return to work. This would mean a maximum of eight hours of paid time off for employees receiving two doses. If an employee spends less time getting the vaccine, only the necessary amount of paid time off 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., paid time off, to cover the additional time. If an employee is vaccinated outside of their regular work hours they will not be compensated, nor will employees be eligible to be compensated for vaccinations received prior to December 6, 2021. The paid time off established in this paragraph will be in addition to any other paid time off an employee is entitled to.

Employees may utilize up to two workdays of sick leave/paid time off 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/ paid time off immediately following each dose if necessary.

Employees should request and coordinate time-off for obtaining vaccinations with their supervisors.

### **Employees Who Have Tested Positive For and/or Been Diagnosed with COVID-19**

JURISolutions will require employees to promptly notify their supervisor and Christine Durham ([cdurham@jsl-hq.com](mailto:cdurham@jsl-hq.com)) when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider, except when employees are working from home during the entire duration of their illness (and through satisfaction of the Return to Work Criteria below) and are not otherwise requesting time off on account of COVID-19.

JURISolutions' regular leave policies (e.g., sick leave, paid time off, etc.) will apply for any COVID-19 positive employee who is unable to work from home.

**Medical Removal from the Workplace.** JURISolutions has also implemented a policy for keeping COVID-19 positive employees from the workplace in certain circumstances. JURISolutions will immediately remove an employee from the workplace 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). Employees who have been diagnosed with COVID-19 will be expected to work remotely, if they feel able (and where applicable, permitted by a client), or take paid time off pursuant to JURISolutions' paid time off policy.

**Return to Work Criteria.** For any employee removed because they are COVID-19 positive, JURISolutions will keep them removed from the workplace until the employee 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 chooses to seek a NAAT test for confirmatory testing; meets the return to work criteria in CDC's then current (at the time of testing) "Isolation Guidance"; or receives a recommendation to return to work from a licensed healthcare provider.

If an employee has severe COVID-19 or an immune disease, JURISolutions' will follow the guidance of a licensed healthcare provider regarding return to work.

## **COVID-19 Testing**

All employees who are not fully vaccinated and who are not working from home on an on-going basis will be required to comply with this policy for testing.

Employees who report to the workplace at least once every seven days:

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

(B) must provide documentation of the most recent COVID-19 test result to Christine Durham no later than the seventh day following the date on which the employee last provided a test result.

Any employee who does not report to the workplace during a period of seven or more days (e.g., if they were teleworking for two weeks prior to reporting to the workplace):

(A) must be tested for COVID-19 within seven days prior to returning to the workplace; and

(B) must provide documentation of that test result to Christine Durham upon return to the workplace.

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

Employees 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. Such employees may return to work once they have satisfied the CDC's then current criteria for returning to work.

Employees are responsible for obtaining and paying for their own tests.

## **Face Coverings**

JURISolutions will require all employees who are not fully vaccinated to wear a face covering unless working from home. 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 on the outside 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 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.

Employees are responsible for obtaining their own face coverings.

The following are exceptions to JURISolutions' requirements for face coverings:

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

## **New Hires**

All new employees are required to comply with the vaccination, testing, and face covering 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.

## **Questions**

Please direct any questions regarding this policy to Christine Durham, Human Resources ([cdurham@jshq.com](mailto:cdurham@jshq.com)).

### **Acknowledgment of Receipt and Review**

The undersigned employee acknowledges that I have received a copy of the JURISolutions, Inc. COVID-19 Vaccination, Testing and Face Covering Policy for Internal and Contingent Employees and that I have read it, understand it, and agree to comply with it. I understand that JURISolutions, Inc. has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this policy at any time with or without notice. I understand that any delay or failure by JURISolutions, Inc. to enforce this policy will not constitute a waiver of JURISolutions, Inc.'s right to do so in the future. I understand that neither this policy nor any other communication by a management representative or any other employee, whether oral or written, is intended in any way to create a contract of employment. I understand that I am employed at will and this policy does not modify my at-will employment status.

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Signature

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Printed Name

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Date