



[DRAFT] Policy: SARS-CoV-2 (COVID-19) Vaccination Program

Responsible Officers:	Executive Vice President – University of California Health (UC Health) Executive Vice President University of California Operations (Campuses, ANR, Labs)
Responsible Offices:	University of California Health (UCH) University of California Operations (UCO)
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Last Review Date:	[DATE], 2021
Scope:	All University of California locations and all faculty, academic personnel, staff, trainees, and students accessing University facilities and programs.

	UC Health	Campuses, ANR, Labs
Contact:		
Title:		
Email:		
Phone:		

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I. POLICY SUMMARY

The purpose of this policy is to protect the health and safety of the University community, including its patients and the faculty, academic appointees, staff, Trainees, Students, and others who work, live, or learn in any of the University's locations. The University strongly recommends that all members of the community obtain the COVID-19 vaccine as soon as they are eligible. This policy requires all University of California Personnel, Trainees, and Students accessing University Facilities and Programs in person to receive the COVID-19 vaccine, subject to limited exceptions and exemptions, beginning before the start of the Fall 2021 term. Enforcement of the mandate will be delayed until full FDA licensure (approval) and widespread availability of at least one vaccine. Those who do not receive a vaccination on campus or provide proof of vaccination by another provider may be subject to additional safety measures.

II. DEFINITIONS

COVID-19 Vaccination Program: A vaccination program intended to reduce the incidence of SARS-CoV-2 infection and resultant COVID-19 disease in the University community.

Exception: An Exception to the COVID-19 vaccine mandate based on a person's sincerely held religious belief, practice, or observance, which includes any traditionally recognized religion as well as beliefs, observances, or practices, which an individual sincerely holds and which occupy in their life a place of importance parallel to that of traditionally recognized religions. Requests for Exceptions must be submitted to authorized campus representatives, who vary by campus and requestor group. **[LINK TO LIST]** A person who is granted an Exception may be required to adhere to compensating or mitigating controls including additional Non-Pharmaceutical Interventions for the health and safety of the campus community.

Healthcare Location: A collection of buildings and Personnel that service an academic health system including hospitals, ambulatory surgery centers, outpatient centers, clinics, or other locations where preventive, diagnostic, therapeutic, or other interventional physical or behavioral healthcare services are provided to UC Health patients, employees, or research participants and any associated educational, research, or administrative facilities and offices. A Healthcare Location does not include student health and counseling centers and refers only to that part of a campus that meets this definition.

Initial Allocation: The period immediately following [Emergency Use Authorization](#) or [Licensing](#) of COVID-19 vaccine, and extending until the time when there are sufficient supplies of EUA-authorized or Approved COVID-19 vaccine to vaccinate all Personnel, Trainees, and Students who wish to be vaccinated.

Licensing: The process used by the U.S. Food and Drug Administration to approve commercial distribution of a biological drug like a vaccine.

Location (or University Facility): Any United States campus, medical center, or facility operated by the University in connection with its research, teaching, public service, or clinical care missions or programs. A Location does not include a property owned by the University but leased to a third party unless (and only to the extent) a University Program occurs at that site.

Location Vaccine Authority (LVA): The office or person responsible for implementing the COVID-19 Vaccination Program for a Location, typically the Chief Medical Officer at a Medical Center or an Occupational Health or Student Health office at an academic campus. The LVA is a health care provider and its records are considered confidential health records for purposes of the University’s privacy policies.

Medical Exemption: An excuse from receiving COVID-19 vaccine due to medical contraindications or precautions recognized by the U.S. Food & Drug Administration or Centers for Disease Control and Prevention; or disability. Requests for Medical Exemptions must be submitted to authorized University representatives, who vary by Location and requestor group. [\[LINK TO LIST\]](#) A person who is granted a Medical Exemption may be required to adhere to compensating controls including additional Non-Pharmaceutical Interventions for the health and safety of the University community.

Non-Pharmaceutical Intervention (NPI): An action, other than getting vaccinated or taking medicine, that members of the University community can take to help slow the spread of COVID-19 and other illnesses. These include, for example, staying home, especially when a person is sick or when a member of the person’s family or household is sick; quarantining when a person has been exposed to someone else with the illness; avoiding large gatherings; physical/social distancing; wearing personal protective equipment or face coverings; frequent handwashing and cleaning; and asymptomatic (surveillance) and symptomatic testing.

Participation: Receipt of information about COVID-19 vaccine and: (i) receipt of a COVID-19 vaccine at a Location, (ii) obtaining an Approved or EUA-authorized vaccination at an alternative site (e.g., a primary care physician’s office, a public health clinic, a local pharmacy, or a vaccine fair) and providing documentation of vaccine status to the University, or (iii) University approval of an Exception or Medical Exemption request, documented on an approved Declination Form. Participation compliance under this policy for those receiving vaccine may require repeat vaccinations or boosters on an annual or recurring basis consistent with FDA-approved labeling and CDC recommendations.

Personnel: University faculty, other academic appointees, and staff working, living, and/or learning on site, including but not limited to visiting, volunteer, without salary, and emeritus/a professors, visiting or volunteer academic appointees, and contract, recall, and emeritus/a employees.

Students: The term “student” has the same meaning as defined in PACAOS 14.40, currently: an individual for whom the University maintains student records and who: (i) is enrolled in or registered with an academic program of the University; (ii) has completed the immediately preceding term, is not presently enrolled, and is eligible for reenrollment; or (iii) is on an approved educational leave or other approved leave status, or is on filing-fee status. The term includes some Trainees, as defined below. It also

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includes visiting students. It excludes individuals who are not currently living, working, and/or learning at a Location or participating in-person in a University Program.

Trainees: Medical, nursing, and other health professional students and residents, including visiting students and students of externally sponsored educational programs participating in rotations at Healthcare Locations; and undergraduate and graduate students who are volunteering, learning, and/or working in Healthcare Locations, for example at COVID testing/laboratory sites.

University: The University of California.

University Program: A program or activity operated by the University to support the University’s teaching or research mission and generally offered exclusively to University Personnel or Students. Examples of covered Programs that may not be conducted at a Location include the [UC Education Abroad Program](#) and University-sponsored athletics programs.

Vaccine Approval: For purposes of this policy, a COVID-19 vaccine is considered “approved” after the following conditions are met: (i) the U.S. Food and Drug Administration has issued a [License](#) for the vaccine; and (ii) the U.S. Centers for Disease Control and Prevention has recommended its administration. However, any vaccine administered under a [License](#) or an [Emergency Use Authorization](#) (EUA) meets the vaccination requirements of this policy.

Vaccine Information Statement (“VIS”): An information sheet produced by or including information derived from the Centers for Disease Control and Prevention, the California Department of Public Health, or UC Health or any of its components, explaining in plain language the benefits and risks of a vaccine to vaccine recipients. A VIS generally must be provided to an individual being vaccinated prior to each dose of the vaccine. For purposes of this policy, a VIS may also include U.S. Food and Drug Administration fact sheets for vaccine recipients and caregivers.

Working, Living, and/or Learning on Site: Accessing a University Facility or Program for any work-, research-, or education/training-related purpose (as distinguished from accessing a Healthcare Location to obtain healthcare services as a patient), including living in housing furnished by the University, or using University amenities such as libraries, workout facilities or dining halls. Access is not defined by reference to any particular frequency (e.g., daily, weekly, monthly, *ad hoc*).

III. POLICY TEXT

This policy supplements, and does not replace, existing policies requiring University Personnel, Trainees, Students, patients, and visitors to observe Non-Pharmaceutical Interventions including appropriate use of either personal protective equipment (where required) or face coverings, social and physical distancing, frequent hand-washing and cleaning, and regular surveillance testing.

- A. [COVID-19 Vaccination Program](#). All Personnel, Trainees, and Students accessing any University Facility or Program in person in connection with their

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employment, appointment, or educational program must participate in the COVID-19 Vaccination Program by receiving information about the vaccine; and, no later than the start of the Fall 2021 term, either (i) receiving vaccination; or (ii) receiving an approved Exception or Medical Exemption and submitting a Declination Form, as further described below. Until the time at least one vaccine is fully Licensed and available to anyone who wishes to be vaccinated, participation may be delayed for some or all Personnel, Trainees, and Students consistent with the procedures described under COMPLIANCE/RESPONSIBILITIES below.

1. Information. All Personnel, Trainees, and Students shall receive information at the time of hire or the beginning of their educational program, at the time of each required vaccination activity, as part of ongoing training and education, or any combination thereof concerning:
 - a. The potential benefits of COVID-19 vaccination;
 - b. The potential health consequences of COVID-19 illness for themselves, family members and other contacts, coworkers, patients, and the community;
 - c. Occupational exposure to SARS-CoV-2;
 - d. The epidemiology and modes of transmission, diagnosis, and non-vaccine infection control strategies (such as the use of appropriate precautions, personal protective equipment or face coverings, and respiratory hygiene/cough etiquette), in accordance with their level of responsibility in preventing COVID-19 infections;
 - e. The safety profile and potential risks of any COVID-19 vaccine; and
 - f. Requirements for Participation in the COVID-19 Vaccination Program and consequences of failing to participate.

The information may be conveyed through any combination of written information statements (e.g., a VIS), verbal communications, or online or in-person training programs, consistent with applicable law and Location policies and practices.

Personnel, Trainees, and Students with disabilities who require accommodations to access or complete any informational or educational materials or programs should contact their local employee or student disability management services office.

2. Receipt of Vaccine. Personnel, Trainees, and Students may: (i) receive vaccination on site at any Location that offers COVID-19 vaccine; or (ii) provide written documentation to the Location Vaccine Authority or designee of vaccination through an alternative clinical site (e.g., at a private health care provider's office, pharmacy, public health clinic, or mass vaccination site).

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3. Vaccine Declination. Personnel, Trainees, and Students who receive an approved Exception or Medical Exemption may decline the COVID-19 vaccine by completing a Vaccine Declination Form and submitting it to the Location Vaccine Authority by the date established by the LVA, as provided under Compliance/Responsibilities below. A sample Vaccine Declination Form that may be utilized by any Location for this purpose is attached. The following procedures apply to vaccine declinations:
 - a. Individuals who are not vaccinated and do not have an approved Exception or Medical Exemption documented on a Declination Form will not be cleared to access University Facilities or Programs in person.
 - b. Any Personnel, Trainees, or Students who are not vaccinated may be required to participate in or implement additional NPIs as directed by the LVA or designee to mitigate risk to patients, Personnel, Trainees, Students, and others whenever they access University Facilities or Programs in person. These may include more frequent and regular asymptomatic testing.
 - c. Any Personnel, Trainees, or Students with an approved Exception or Medical Exemption may nevertheless decide to become vaccinated. In this case, they are encouraged to discuss their plans with occupational health, their primary care physicians, or local pharmacies, and may receive the vaccine through any of these and provide documentation of the administration to the LVA or designee.
 4. Initial Allocation. During the period of Initial Allocation, Locations are encouraged but not required to mandate full program Participation (see Section IV.C below); however, Locations are expected to comply with applicable legal and policy requirements for providing information to individuals voluntarily receiving vaccine such as the information described in Section III.A.1 above.
- B. Superseding Public Health Directives. In the event a federal, state, or local public health agency with jurisdiction imposes a mandate restricting or eliminating Participation options, the applicable public health mandate will be implemented at the affected Location(s). Inconsistent directives issued by agencies with overlapping jurisdiction should be discussed with a Location's Office of Legal Affairs.

C. Tracking and Reporting

1. The following information must be recorded and tracked by the Location Vaccine Authority or designee in the applicable confidential health record, consistent with University privacy and security policies including [BFB-IS-3](#) (Electronic Information Security Policy): date of administration, vaccine type and manufacturer, and site of administration (e.g., University, Pharmacy, PCP, Mass Vaccination Site). Additional information must be recorded when vaccines are administered by the Location (e.g., vaccine lot number, expiration date, name/title of the person administering vaccine, address of the facility where the record of administration will reside, and version of VIS provided).
2. Any adverse events associated with COVID-19 vaccine administered at a Location and reported to the University must be tracked and logged by the LVA or designee and reported to federal and state public health officials using the [Vaccine Adverse Event Reporting System \(VAERS\)](#).

D. Registry and Program Evaluation

1. Appropriate information about all vaccinations administered by the University shall be submitted to the [California Immunization Registry](#) (CAIR) or such other registries as may be required by applicable public health agencies or University policy. While vaccine recipients ordinarily are permitted to opt out from registry reporting in California, the California Department of Public Health [has mandated](#) that all participating vaccinators report each dose of COVID-19 vaccine administered. Accordingly, the typical opt-out option does not apply.
2. Individual Healthcare Locations shall, and other Locations may, evaluate Initial Allocation and, thereafter, program Participation, on an annual and ongoing basis, including evaluation of equity and disparities in Initial Allocation and program implementation; as well as reasons identified for non-participation or untimely participation, the number and characteristics of Personnel, Trainees, and Students not vaccinated, and the reasons given (if any) for declination.

E. Program Implementation and Enforcement

1. Program Participation is mandatory. Individuals eligible for an Exception or Medical Exemption may, after receiving appropriate information about the vaccine, consent to vaccination or submit a completed Declination Form to the Location Vaccine Authority. Declination may require additional compensating controls including additional Non-Pharmaceutical Interventions for the health and safety of the University community, as determined by the Location Vaccine Authority or designee.

2. Program implementation with respect to Students will be handled consistent with the procedural provisions of the [Student Immunization Policy](#).
3. Any Personnel, Trainees, or Students subject to this policy who fail to participate in the COVID-19 Vaccination Program as described in section E.1 above by the locally established deadline (i.e., by receiving the vaccine or receiving an Exception or Medical Exemption and submitting a written Declination Form) may be prohibited from in-person access to University Facilities or Programs, including University housing.

IV. COMPLIANCE / RESPONSIBILITIES

- A. CDC and FDA generally translate VIS into many languages commonly spoken in California and elsewhere in the United States and post these online. The relevant VIS should be provided to a person receiving vaccine in a language that they understand. In the event relevant VIS translations are unavailable, they should be accompanied when distributed with a document with [taglines such as those approved by the U.S. Department of Health & Human Services to facilitate language access by all affected Personnel, Trainees, and Students](#). Interpreters should also be made available in person, by video, or by phone during vaccine clinics.
- B. Each Location is responsible for: (i) assuring any necessary updates are made to its local Infectious Diseases/Infection Prevention and Control Programs; (ii) establishing deadlines for COVID-19 Vaccination Program Participation on an annual or ongoing basis, in consultation with epidemiology and infection prevention experts and occupational health representatives as applicable and consistent with any supply limitations; and (iii) assuring implementation of the COVID-19 Vaccination Program at all sites.
 1. Each Location, in consultation with the Location Vaccine Authority and others, as appropriate, shall develop and publicly post its plans for Initial Allocation of vaccine and any subsequent periods of shortage, consistent with guidelines and directives published by federal, state, and local authorities, including the ethical principles articulated by the U.S. Advisory Committee on Immunization Practices: (1) maximize benefits and minimize harms; (2) promote justice; (3) mitigate health inequities; and (4) promote transparency.
 2. Implementation includes informing Personnel, Trainees, and Students of the requirement and deadline for program Participation, dates and

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Locations for on-site administration, and that vaccines will be provided at no cost to recipients.

3. Each Location should implement strategies for vaccine access, including efforts to ensure vaccination availability during all work shifts and to address vaccine hesitancy, particularly among groups at most significant risk for contracting COVID-19 and suffering severe illness.
 4. Timing for implementation will depend on timing of Vaccine Approval, recommendations of federal and state public health authorities, and the availability of vaccine from suppliers. As a general matter, the vaccine mandate (subject only to University-approved Exceptions and Medical Exemptions described above), will be effective on the later of: (i) the beginning of the Fall Term; or (ii) when at least one COVID-19 vaccine is fully [Licensed](#) by FDA and available to anyone who wants it. Students are strongly encouraged to get their vaccines before coming to campus.
- C. Chancellors and leaders at non-campus locations are responsible for implementing this policy. Deans, Department Chairs, unit heads, managers, supervisors, student affairs leaders, and others with responsibility for personnel management will support program implementation and enforcement. Consultation with Academic Senate leaders, especially on the campus, is encouraged with respect to implementation procedures for academic appointees.

V. PROCEDURES

Each Location may establish local procedures to facilitate implementation of this policy.

VI. RELATED INFORMATION

- [Advisory Committee on Immunization Practices – *Ethical Principles for Allocating Initial Supplies of COVID-19 Vaccine – United States, 2020* \(MMWR Nov. 23, 2020\)](#) and [Meeting Information](#) (November 23 and December 1, 2020)
- [UC Health Coordinating Committee – Bioethics Working Group Vaccine Allocation Recommendations](#)
- [Cal. Health & Safety Code Division 2, Chapter 2, Article 3.5](#)
- California Department of Public Health, [Licensees Authorized to Administer Vaccine in California](#)
- [Centers for Disease Control and Prevention, COVID-19 Vaccine Training: General Overview of Immunization Best Practices for Healthcare Providers](#)
- [FDA COVID-19 Vaccine Information](#)
- [FDA Janssen COVID-19 Vaccine](#) (includes fact sheet and translations)
- [FDA Pfizer-BioNTech COVID-19 Vaccine](#) (includes fact sheet and translations)

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- [FDA Moderna COVID-19 Vaccine](#) (includes fact sheet and translations)
- [CDC COVID-19 Vaccination](#)
- [CDC COVID Vaccination Program Planning Guidance](#)
- [CDC Vaccine Recommendation Process](#)
- [American Medical Association, Opinion 8.7, Routine Universal Immunization of Physicians](#) and KB O'Reilly, [Are Physicians Obligated to Get Vaccinated Against COVID-19?](#) (November 16, 2020)
- [Infectious Disease Society of America – COVID-19 Vaccine Information](#)
- [Congregation for the Doctrine of the Faith, Note on the Morality of Using Some Anti-COVID-19 Vaccines](#) (December 21, 2020)

VII. FREQUENTLY ASKED QUESTIONS

1. *What is the relationship between this policy and the currently posted interim policy?* This policy, if approved, will become effective at the beginning of the Fall term and at that time will replace the posted interim policy.
2. *Am I required to be vaccinated to attend school?* Individuals, including Personnel and Students, must receive the COVID-19 vaccine in order to access University Facilities and Programs in person, unless they have been granted an Exception or Medical Exemption and submitted a Declination Form to the Location Vaccine Authority.
3. *How do I apply for an Exception or a Medical Exemption?* Procedures vary at each Location [\[LINK TO LIST\]](#).
4. *How will I know if my co-workers or fellow Students are going unvaccinated?* The University will not disclose vaccine status of individual Personnel, Trainees, or Students to coworkers or fellow Students; however third parties and some Locations may distribute badge attachments, stickers, pins, or other indicators that vaccinated individuals may use to show that they have received the vaccine.
5. *I am immunocompromised and have been told that my vaccination may not fully protect me. How can I protect myself when the University is not requiring all Personnel, Trainees, and Students to be vaccinated?* Please contact your local disability services office to discuss your situation and reasonable accommodations.
6. *Will University of California Health specify which authorized or licensed vaccine is preferred?* The UC Infection Prevention Collaborative supports the principle that all EUA-authorized vaccines are safe and very effective in preventing symptomatic COVID-19 and in decreasing the odds of hospitalization and death. In order to reach herd immunity, the UC Infection Prevention Collaborative recommends that every effort be made to maximize vaccine uptake across the UC systems and more widely. This can be achieved by maximizing access,

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minimizing barriers, and ensuring that our communities are vaccinated within the shortest timeframe. As stated by the CDC, the best vaccine is the one that you are eligible to receive and that you can get today.

7. *Will Locations provide paid time off for non-exempt employees for the time needed to get vaccinated?* Yes. Non-exempt employees and hourly academic appointees may take up to four hours of paid time to obtain each dose of the SARS-CoV-2 (COVID-19) vaccine. These employees and academic appointees must provide advance notice to their supervisor. If an employee or academic appointee needs more time for this purpose, the employee or academic appointee may request EPSL (Reason 3(d)) for the additional time.
8. *What if I experience flu-like symptoms as a result of the vaccine that mean I cannot work as scheduled, or attend classes?* Employees should contact their supervisors or local human resources offices for instruction but as a general matter, PTO, sick, or COVID leave may be used to take time off as needed to recover. Students should contact their faculty/instructors regarding minor illnesses or disability services to address any significant issues.
9. *If I receive an approved Exception or Medical Exemption and decline the vaccine, what “compensating controls” will apply to me?* Currently all employees, Trainees, and Students must comply with state and local health orders and with Location-specific policies regarding Non-Pharmaceutical Interventions including personal protective equipment or face coverings, social and physical distancing, frequent hand washing, regular cleaning and disinfection, and routine surveillance testing. Additional safety measures, such as quarantine upon initial arrival to campus and increased surveillance testing frequency, may be deemed necessary by local public health, environmental health and safety, occupational health, or infection prevention authorities, including the Location Vaccine Authority. In that case, a person who has received an approved Exception or Medical Exemption and submitted a Declination Form to the LVA will be informed of any additional requirements.
10. *Does this policy apply to contractors? Volunteers?* Employees of contractors, independent contractors, and volunteers who work side-by-side with University Personnel or Trainees, or who have direct contact with patients or Students, will be asked to participate in the program.
11. *Who will pay for the vaccine?* Initial supplies have been paid for by the federal government. Vaccines administered by the University as part of the program (e.g., during vaccine clinics or at employee health or occupational health offices) are administered free of charge. In addition, all of the University’s health plans cover CDC-recommended vaccines administered by an employee’s primary care physician or at a local pharmacy.

12. *How will enforcement work for failure to participate in the program?* Efforts will be made to encourage Participation by receiving education and *either* receiving vaccine or declining vaccine after receiving an approved Exception or Medical Exemption. Those who, following these efforts, fail to participate entirely, will be barred from in-person access to University Facilities and Programs, and may experience consequences as a result.
13. *How will the University prioritize those eligible to receive vaccine?* Distribution will be staged at a state and local level consistent with federal and state guidelines.
14. *I am at high risk for severe illness if I contract COVID-19 and even though I have been vaccinated, I know that no vaccine is 100% effective. Do I have to come to work if my co-workers or Students are not all vaccinated? What accommodations will be made for me?* Please contact your local disability services office to discuss your situation and available accommodations.

VIII. REVISION HISTORY

First Effective Date: December 14, 2020

Amended: January 15, 2021 (extended from UC Health to all University locations)

Amended: [DATE] (extended to Students, effective Fall 2021; and vaccine mandated at that time for all groups subject only to limited Exceptions and Medical Exemptions)

This Policy is formatted to meet Web Content Accessibility Guidelines (WCAG) 2.0.

IX. APPENDIX

- A. [Vaccine Information Statement](#) [COMING SOON]
- a. [FDA EUA Fact Sheet for Recipients and Caregivers](#) (Janssen)
 - b. [FDA EUA Fact Sheet for Recipients and Caregivers](#) (Pfizer-BioNTech)
 - c. [FDA EUA Fact Sheet for Recipients and Caregivers](#) (Moderna)
- B. Model Acknowledgement Form
- C. Model Declination Form

Note: The model forms are provided for convenience only and may be adapted by locations consistent with applicable policies and practices.