

## Accommodation Procedure for COVID-19 Vaccine

### Overview

COMPANY (“Company”) allows for exemptions to COVID-19 immunization requirements as a reasonable accommodation to assist any employee who is disabled, pregnant, who is a nursing mother, who has a qualifying medical condition that is a contraindication to the vaccination, or who objects based on sincerely held religious beliefs and practices.

The following procedure should be utilized when a vaccine exemption is requested as a reasonable accommodation.

### Policy

Requests for Accommodation (insert language from Company’s vaccine policy here)

*To assist any employee who is disabled, pregnant, who is a nursing mother, who has a qualifying medical condition that is a contraindication to the vaccination, or who objects to being vaccinated on the basis of sincerely held religious beliefs and practices, the Company will engage in an interactive process to determine whether it can provide a reasonable accommodation provided it does not create an undue hardship for the Company and/or does not pose a direct threat to the health or safety of others in the workplace and/or to the employee. If you believe that you require such an accommodation, please notify the **POSITION TITLE** in writing at [insert email/contact]. Once the Company is aware of the need for an accommodation, the Company will engage in an interactive process to identify possible accommodations. If you believe that you have been treated in a manner not in accordance with these policies, please notify the Company immediately by speaking to the **POSITION TITLE**. You may utilize this procedure without fear of retaliation.*

### Procedure

The employee requesting an exemption from the vaccine policy as a reasonable accommodation will be provided:

- A Request for Medical Exemption/Reasonable Accommodation Form or Request for Religious Exemption/Reasonable Accommodation Form to complete and return to the Human Resource Department. If the request for accommodation does not fall into one of these categories, please contact [POSITION TITLE] for more information.
- The Company’s COVID-19 vaccine policy.
- A copy of the Job Description for their position, and/or alternative positions where appropriate.

### Interactive Process

After receipt of the employee’s Request for Exemption/Accommodation, the **Human Resources Department** will engage in an interactive process with the employee to identify a

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**Commented [A1]:** This framework is applicable to flu shots and other employer-mandated vaccines. Thus, the references to COVID-19 may be revised to encompass any other vaccinations that the employer requires.

possible accommodation. The Company reserves the right to maintain a record of each related conversation.

The interactive process is intended to clarify the employee's request and identify the appropriate exemption/reasonable accommodation. **Human Resources** may ask the employee relevant questions that will enable the Company to make an informed decision about the request.

The exact nature of the dialogue will vary. In many instances, both the reason for the exemption/accommodation and the type of exemption/accommodation required will be obvious, and there may be limited need to engage in a detailed discussion. In other situations, **Human Resources** may need to ask questions and/or seek documentation concerning the nature of the request and to verify the validity of the exemption/accommodation request.

#### **Granting an Exemption/Reasonable Accommodation**

**Human Resources** will complete the Approval section of the Request for an Exemption/Reasonable Accommodation Form when an exemption/accommodation is granted. **Human Resources** will also provide the employee the specific alternative protective measures required of the employee.

#### **Denying an Exemption/Reasonable Accommodation**

**Human Resources** will complete the Denial section of the Request for Exemption/Reasonable Accommodation Form when an exemption/accommodation is denied with a notation of the reason for the denial. Exemption/Reasonable Accommodation denials may be reviewed for legal compliance.