



MEMORANDUM

TO: ALL PHDC EMPLOYEES
FROM: DONNA L. TRENT, VICE PRESIDENT, HUMAN RESOURCES
SUBJECT: COVID-19 VACCINATION, TESTING, AND FACE MASK ("Policy")
DATE: FEBRUARY 9, 2022
CC: AFSCME LOCAL 1971, FILE

Purpose:

Vaccination is a vital tool to reduce the presence and severity of COVID-19 cases in the workplace, in communities, and in the nation as a whole. The Philadelphia Housing Development Corporation ("PHDC") encourages all employees to receive a COVID-19 vaccination to protect themselves and other employees. However, should an employee have requested and been granted a medical or religious exemption from PHDC, this Policy's sections on testing and face masks will apply.

Scope:

This Policy applies to all PHDC employees.

All employees are required to be fully vaccinated unless you are granted an exemption by Human Resources. Employees are considered fully vaccinated two (2) 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 (2) weeks after a second dose in a two-dose series, such as the Pfizer or Moderna vaccines, two (2) weeks after a single-dose vaccine, such as Johnson & Johnson's vaccine, or two (2) weeks after the second dose of any combination of two (2) doses of different COVID-19 vaccines as part of one (1) primary vaccination series. Employees who are not fully vaccinated because they have been granted an exemption will be required to submit to weekly COVID-19 testing in PHDC's office and wear a surgical mask covered by a cloth mask ("**Double Mask**") or wear an appropriate N95 or equivalent mask at the Workplace (defined below).

*****Note, that as of the date of this Policy the City of Philadelphia's ("City") mask mandate requires face masks in all public indoor settings. As such, PHDC will continue to require face**

masks for all employees and any other individuals at the Workplace regardless of vaccination status until the City's mask mandate is lifted.

For purposes of this Policy, "**Workplace**" is defined as any location that is not your home (including sitting in any PHDC vehicle) at which you are present while punched in for work.

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 may request an exemption from vaccination requirements if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to an exemption if they cannot be vaccinated and/or wear a face mask (as otherwise required by this Policy) because of a disability, or if the provisions in this Policy for vaccination, and/or testing for COVID-19, and/or wearing a face mask conflict with a sincerely held religious belief, practice, or observance. Requests for exceptions and reasonable accommodations must be initiated by contacting your supervisor or the Human Resources Manager Kia J. Miller via telephone at 215-448-3038 or via e-mail at Kia.J.Miller@phdc.phila.gov. All such requests will be handled in accordance with applicable laws and regulations and PHDC's policies and procedures.

Employees not in compliance with this Policy or engaging in fraud, lying, falsifying, or other similar conduct with respect to any requirement in this Policy will be subject to discipline up to and including termination. In addition, please be advised that using a fake vaccination card or otherwise falsifying a vaccine record is a crime under federal law.

Procedures:

Overview and General Information

Vaccination

In order to continue working in their current position, all PHDC employees are required to have been granted an exemption by December 24, 2021 or receive at least a first dose of COVID-19 vaccination(s) and provide proof of their vaccination status by February 11, 2022. Employees who are on a leave of absence on the effective date of this Policy must comply with this provision before being permitted to return to the Workplace. PHDC employees who receive a first dose of a COVID-19 vaccine by February 11, 2022 will be required to complete their vaccination series according to the schedule prescribed for the vaccine they receive and will be required to Double Mask or wear an appropriate N95 or equivalent as well as participate in the testing requirements detailed in this Policy until the vaccination schedule is complete. Employees must provide proof that they have completed their vaccination series within the required timeframe.

Any employee who is not fully vaccinated will be subject to the regular testing and face mask requirements of this Policy.

To comply with PHDC's vaccine requirements, by February 11, 2022 an employee must:

- Obtain the first dose of a two-dose vaccine no later than February 11, 2022; and the second dose no later than March 4, 2022 for the Pfizer vaccine and March 11, 2022 for the Moderna vaccine; or
- Obtain one dose of a single dose vaccine no later than February 11, 2022.

Employees may schedule their vaccination appointments through an on-site clinic, through their own medical provider, or with a mass-vaccination clinic. Any questions about this Policy should be directed to the Human Resources Manager Kia J. Miller via telephone at 215-448-3038 or via e-mail at Kia.J.Miller@phdc.phila.gov.

Testing and Face Masks

All employees who are not fully vaccinated will be required to undergo regular COVID-19 testing in the office and double mask (wear a surgical mask covered by a cloth mask) or an appropriate N95 or equivalent mask when in the Workplace. Policies and procedures for testing and face masks are described in the relevant sections of this Policy.

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 e-mail to Human Resources at PHDC-HR@phila.gov or by uploading to the Kronos portal. For any questions or concerns, please contact Kia. J. Miller at Kia.J.Miller@phdc.phila.gov or 215-448-3038.

Acceptable proof of vaccination status is:

1. The record of immunization from a health care provider or pharmacy; or
2. A copy of the CDC COVID-19 Vaccination Record Card; or
3. A copy of medical records documenting the vaccination; or
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, PHDC 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, please follow the steps outlined here: https://www.phila.gov/media/20210913135424/RequestingImmunizationRecords_COVID-19_9-13-21.pdf.

Employees who are vaccinated must submit their proof of vaccination to Human Resources via e-mail at PHDC-HR@phila.gov or by uploading to the Kronos portal. For any questions or concerns, please contact Kia. J. Miller at Kia.J.Miller@phdc.phila.gov or 215-448-3038.

All Employees

All employees, both vaccinated and unvaccinated, must inform PHDC of their vaccination status. The following table outlines the requirements for submitting vaccination status documentation.

Vaccination Status	Instructions	Deadline(s)
Employees who are not vaccinated.	Submit statement that you are unvaccinated, not planning to receive a vaccination, and shall request, complete, and submit the appropriate exemption form under which you qualify.	Completed exemption form must be received by December 24, 2021
Employees who are vaccinated.	Submit proof of vaccination.	February 11, 2022

Unvaccinated Employees

Employees who fail to comply with this Policy by providing proof that they have received their first dose of vaccine by 5 p.m. on February 11, and who are not granted an exemption will be considered unable to perform their duties, will be informed they may no longer report for work, and will be placed in unpaid leave status ("**Vax Leave**"). If, at the end of the period of Vax Leave, the employee has not started the employee's schedule of vaccination, the employee may be separated from employment.

Employees who receive the first vaccine dose of a COVID-19 vaccine during Vax Leave will be given an appropriate length of time to complete that vaccine schedule as determined by the type of vaccine, will be removed from Vax Leave and be required to return to work. The employee would also be able to return to the Workplace but must Double Mask or wear an appropriate N95 or equivalent mask as well as participate in the testing requirements until the vaccination

schedule is complete. Should the employee fail to complete the vaccine schedule and provide proof thereof in the timeframe provided, the employee may be separated from employment.

Employees on Vax Leave will be required to utilize accumulated paid vacation or compensatory leave. Employees who do not have paid vacation or compensatory leave available will remain in unpaid status.

Employees may be placed on Vax Leave for a maximum of thirty (30) calendar days following the employee's removal from the Workplace for failure to comply with the requirements of this Policy.

Employees on Vax Leave shall continue to be eligible for health benefits and shall not experience a break in seniority or pension service, provided that they have sufficient vacation time available to cover the period of Vax Leave. If the employee does not have sufficient accumulated vacation available, any period of Vax Leave beyond fifteen (15) calendar days will be considered a break in service.

Any employee who fails to comply with the requirements of this Policy and is separated from employment shall be considered to have abandoned their position and their separation shall not be subject to the just cause provision of any applicable collective bargaining agreement.

Employee Notification of COVID-19 and Removal from the Workplace

PHDC will require employees to promptly notify Human Resources when they have tested positive for COVID-19 by a PCR test or an FDA approved at-home COVID-19 test or have been diagnosed with COVID-19 by a licensed healthcare provider.

If an employee is sick with symptoms of COVID-19 while at home, they are not permitted to enter the Workplace and must contact their supervisor and Human Resources. If the employee becomes sick during the workday while they are present at the Workplace, they must immediately leave the Workplace and notify their supervisor and Human Resources.

Employees who test positive with or are diagnosed with COVID-19 should consult Human Resources if they have any questions about any applicable sick leave or Family Medical Leave Act leave that may be available to them.

Medical Removal from the Workplace

PHDC has also implemented a procedure for keeping COVID-19 positive employees from the Workplace in certain circumstances. PHDC 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).

Return to Workplace Criteria

For any employee who is COVID-19 positive, PHDC will keep them removed from the Workplace until:

- the employee receives a negative result on a COVID-19 PCR test, if the employee chooses to seek a PCR test for confirmatory testing; or
- meets the return-to-work criteria in CDC's "Isolation Guidance"; or
- receives a recommendation to return to the Workplace from a licensed healthcare provider.

Under CDC's "Isolation Guidance," asymptomatic employees may return to the Workplace once five (5) days have passed since the positive test, and symptomatic employees may return to the Workplace after **all** the following are true:

- At least five (5) days have passed since symptoms first appeared; and
- At least twenty-four (24) hours have passed with no fever without fever-reducing medication; and
- Other symptoms of COVID-19 are improving (loss of taste and smell may persist for weeks or months and need not delay the end of isolation).

If, at any point, PHDC does not require employees to wear masks while at the Workplace, employees who may return to the Workplace based on the aforementioned, will still be required to wear a well-fitting face mask (or Double Mask OR wear an appropriate N95 or equivalent mask if you are unvaccinated) when around others for five (5) days.

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

COVID-19 Testing

All employees who have been granted exemptions will be required to comply with the below guidelines for testing.

PHDC will provide approved nasal or oral antigen tests. These tests are considered "at home" tests, as they are not required to be administered by a licensed medical professional. An antigen test is a test that detects proteins on the virus that causes COVID-19. A positive result means that the virus that causes COVID-19 has been detected in the specimen provided.

Frequency and Timing

Unvaccinated employees who report to the Workplace at least once every seven (7) days, regardless of length of time spent at the Workplace, must be tested in PHDC's offices for COVID-19 at least once every seven (7) days.

Any unvaccinated employee who does not report to the Workplace during a period of seven (7) or more days (e.g., if they were working from home for two (2) weeks prior to reporting to the Workplace) must be tested for COVID-19 upon returning to the Workplace.

Unvaccinated office staff employees must report to the Human Resources office no earlier than 8:30 a.m. to be tested on the first day that they are scheduled to work in the Workplace.

Unvaccinated field staff employees must report to the Human Resources office to be tested no earlier than 8:30 a.m. on each Monday (or their first workday of the week, if they are scheduled off or call out on a Monday).

Unvaccinated employees must complete the COVID-19 Employee Screener at home prior to reporting to the Workplace for COVID-19 testing. An unvaccinated employee is not permitted to report to the Workplace if the COVID-19 Employee Screener requires that you stay home.

Administration of Tests

The employee will be provided with an over the counter "at home" test for the employee to self-administer. A Human Resources employee will observe the employee self-administering the test. The results will be reviewed and recorded by a Human Resources employee in the presence of the employee.

Employees who have a positive test result are strongly encouraged to follow up with a PCR test administered by a lab or testing site in order to confirm the result. If a positive antigen is followed by a negative PCR the same day, then the employee should not be considered to have COVID. A second antigen test should not be done to confirm or dispute a positive antigen. Employees should follow the CDC's isolation requirements. Leave usage will be permitted in accordance with the CDC's isolation requirements.

Policy Violations

If an unvaccinated employee does not submit to testing for COVID-19 as required by this Policy, they will be removed from the Workplace and placed in leave without pay status until they submit to testing and may be subject to discipline up to and including termination.

Face Masks

*****Note, that as of the date of this Policy the City's mask mandate requires face masks in all public indoor settings. As such, PHDC will continue to require face masks for all employees and any other individuals entering a PHDC location regardless of vaccination status until the City's mask mandate is lifted.**

PHDC will require all employees who are not fully vaccinated to wear a face mask. Face masks 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; (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 masks include clear cloth face masks with a clear plastic panel that, despite the non-cloth material allowing light to pass through, otherwise meet these criteria **and** which need to 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 double mask (or an appropriate N95 or equivalent mask) over the nose and mouth when indoors and when occupying a vehicle with another person for work purposes. Policies and procedures for face masks will be implemented as part of a multi-layered infection control approach for unvaccinated workers.

Face masks shall be obtained by the employee and will be available at the PHDC office.

The following are exceptions to PHDC's requirements for face masks:

1. When an employee is alone in a room with floor to ceiling walls and a closed door.
2. 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.
3. When an employee is wearing a respirator.
4. Where PHDC has determined that the use of face masks 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 mask presents a risk of serious injury or death to the employee).

Vaccination Bonus

All regular (past probationary period) PHDC employees who have completed their full schedule of COVID-19 vaccination and who have provided proof of their vaccination status by December 24, 2021, will receive a cash bonus of Three Hundred Dollars (\$300). This bonus does not extend to any employee receiving an exemption to the vaccination requirements, an employee on a leave of absence when the bonus is paid, or any employee working less than twenty (20) hours per week.

Confidentiality and Privacy

All medical information collected from employees, 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 Human Resources Manager Kia J. Miller via telephone at 215-448-3038 or via e-mail at Kia.J.Miller@phdc.phila.gov.

Employee Records

PHDC will keep a roster of employee's vaccination and weekly testing in accordance with this Policy and will not disclose an employee's vaccination status or proof of status, testing results or any other employee-submitted documentation under this Policy, except as authorized by law.

An employee may make the following records requests by e-mailing such request to Human Resources Manager Kia J. Miller via e-mail at Kia.J.Miller@phdc.phila.gov. Human Resources will respond to such request within five (5) business days.

- 1) Copy of their COVID-19 vaccination documentation and any COVID-19 test result.
- 2) Total number of fully vaccinated employees at the Workplace along with the total number of employees at the Workplace.

Other Policies Remain Effective

All PHDC policies including universal leave, disease control, COVID-19 and telecommuting continue to apply unless stated otherwise in writing by Human Resources. This Policy may be amended or modified in compliance with guidelines and mandates from federal, state and local government authorities. PHDC may modify existing policies or establish new policies as necessary.

Violation of the Policy

Violation of this Policy can lead to discipline, including a verbal or written warning. Continued violation of this Policy will be deemed willful and/or wanton neglect of safety and is subject to discipline including, but not limited to, suspension and/or involuntary termination. Any submission to PHDC of a known fraudulent document, including proof of vaccination, a negative COVID-19 test, or a physician's note, shall result in immediate termination of employment.

Additional Resources Provided to Employees

Please read the following information contained in the links below:

[Key Things to Know About COVID-19 Vaccines \(cdc.gov\)](#)

[COVID-19 Quarantine and Isolation | CDC](#)