COVID-19 Vaccination Policy for Employees (including all Faculty and Staff)

Responsible Executive: Provost and Executive Vice President

Responsible Offices: Office of Human Resources, Office of the Dean of the Faculty, University Health Services

Effective Date: June 3, 2021, updated December 16, 2021.

Princeton University seeks to provide a safe and healthy educational and working environment. In furtherance of this goal, and pursuant to its Communicable Disease Policy, the University institutes this policy on COVID-19 vaccination. This policy may be modified by the Environmental Safety and Risk Management Committee based on public health guidance and the University's operational needs.

I. Policy Statement

All individuals routinely working on the Princeton University campus or other property occupied by Princeton—including faculty, staff, researchers, appointed visiting faculty and researchers, temporary employees, and independent contract employees (see definition in Section III) collectively, “Employees”—and all Princeton University faculty and staff working remotely must receive, and provide proof of having received, a full course (two doses of a two-dose vaccine or one dose of a single-dose vaccine) of a COVID-19 vaccine acceptable to Princeton University, as defined below, as well as subsequent boosters. Employees must provide such proof by uploading a copy or photo of their vaccine card to VacStatus.

Employees may request an accommodation (e.g., an exemption) to this requirement based on their disability/medical condition or sincerely-held religious belief by completing and submitting the COVID-19 Vaccine Accommodation Request form found at the VacStatus link. If an accommodation is granted to enable an Employee who is not fully vaccinated to be present at their University workplace, the Employee must comply with all applicable guidance, including that outlined in the Guidance on Face Coverings and provisions of the asymptomatic testing program.

Working remotely is not an available alternative for Employees not fully vaccinated and not eligible for a disability/medical or religious accommodation.

II. To Whom Does This Policy Apply

This policy applies to all Princeton University Employees (as defined in Section I above)

III. Definitions

**Booster** means an additional dose of COVID-19 vaccine six months after receiving the second dose of a two-dose COVID-19 vaccine (see below) or two months after receiving a single-dose vaccine. See [CDC guidelines](https://www.cdc.gov/coronavirus/2019-ncov/vaccines/booster-shot.html) for eligibility for boosters.
**COVID-19 vaccine acceptable to Princeton University** means any COVID-19 vaccine approved or having emergency use authorization from the United States Food and Drug Administration (FDA) and COVID-19 vaccines that have been listed for emergency use by the World Health Organization (WHO). The complete current list, which is available on the United States Centers for Disease Control (CDC) website (https://www.cdc.gov/vaccines/covid-19/info-by-product/clinical-considerations.html#not-authorized-vaccines), includes: Moderna mRNA1273, Pfizer BioNTech Comirnaty, Janssen (J&J)/Ad26.COV2.S, SII/Covishield, AstraZeneca/AZD1222, and Sinopharm COVID-19.

**Disability/Medical Accommodation** means a modification or provision made for an individual with a disability to provide access or enable them to perform the essential functions of a role. If an Employee claims an inability to receive the vaccine due to a disability or medical condition (and is therefore seeking an exemption to the requirement), the Employee must complete and submit the COVID-19 Vaccine Accommodation Request form found at the VacStatus link. The University will engage in a discussion with the Employee and conduct an individualized assessment, taking into account the employee's disability, workplace safety and related factors. The University will then determine if it can implement a reasonable accommodation to mitigate risk while allowing the Employee to be present in the workplace.

**Employee** means all Princeton University faculty, staff, researchers, appointed visiting faculty and researchers, temporary employees, and contract employees routinely working on campus or other property occupied by Princeton University. It includes Princeton University faculty and staff who work remotely.

**Fully-vaccinated** means that at least two weeks have passed since receiving the second dose of a two-dose vaccine or the single dose of a one-dose vaccine, and subsequent necessary boosters. As of January 31, 2022, “fully-vaccinated” includes having a booster dose of a two-dose vaccine (Moderna, Pfizer, etc.) six months after the second dose or a booster dose of a single-dose vaccine (J&J/Janssen, etc.) two months after the single dose.

**Independent contract employees** are contractors who are hired to perform University functions, including temp agencies, event security, etc.

**Record of vaccination (or vaccine card)** refers to the COVID-19 Vaccination Record Card produced by the CDC, an immunization record produced by the state or foreign country where the vaccine was administered, or an immunization record from the medical office where the vaccine was administered. The vaccine card must include the name and date of birth of the individual vaccinated, the manufacturer and lot number(s) of the vaccine, the date(s) that the vaccine(s) were administered, and the location(s) where the vaccine(s) were administered.

**Religious Accommodation** means a modification or provision made to allow an employee to practice or observe their religion. If an Employee claims to be unable to receive a vaccine due to a sincerely held religious belief, practice, or observance (and is thereby seeking an exemption to the requirement), the Employee should complete and submit the COVID-19 Vaccine Accommodation Request form found at the VacStatus link. The University will engage in a discussion with the Employee and conduct an individualized assessment, taking into account the Employee’s sincerely held religious belief, practice, or observance, workplace safety and related factors. The University will then determine if it can implement a reasonable accommodation to mitigate risk while allowing the Employee to be present in the workplace.

**IV. Policy**

All Employees must receive and provide proof of having received a full course (two doses of a two-dose vaccine or one dose of a single-dose vaccine, plus necessary boosters) of a COVID-19 vaccine acceptable to Princeton University.

All Employees must do one of the following by **July 1, 2021**: (1) upload a copy or photo of their vaccine card and enter their vaccine information via the VacStatus link; OR (2) request an accommodation (e.g., an exemption) to this requirement based on their own disability/medical condition or sincerely-held religious belief by completing and submitting the Accommodation Request form found in VacStatus.

https://ehs.princeton.edu/VaccinePolicy
Employees who did not receive an accommodation must also receive a booster vaccine by January 31, 2022 or within 30 days of becoming eligible for a booster vaccine, whichever is later. Employees must enter their booster information into VacStatus.

If an accommodation is granted to enable an Employee who is not fully vaccinated to be present on site, the Employee must comply with all applicable guidance, including that outlined in the Guidance on Face Coverings and provisions of the asymptomatic testing program.

**Requests for Leave**

In cases where (1) Employees have a qualifying disability/medical condition or religious belief but there is no reasonable accommodation enabling them to perform safely the requirements of their position in the workplace or (2) Employees are not fully-vaccinated and not eligible for a disability/medical or religious accommodation, then Employees will have the following options:

- Request to be placed on leave without pay;
- Request to take accrued and unused vacation time; or
- Apply for leave under FMLA (Family and Medical Leave Act).

Working remotely is not an alternative for Employees not fully-vaccinated and not eligible for a Disability/Medical or Religious Accommodation.

**V. Procedures**

All Employees must do one of the following: (1) upload a copy or photo of their vaccine card and enter their vaccine information via VacStatus; or (2) request an accommodation (e.g., an exemption) to this requirement based on their disability/medical condition or sincerely-held religious belief by completing and submitting the Accommodation Request form found on VacStatus.

Employees who have trouble accessing or using VacStatus should contact the OIT Support and Operations Center at 609-258-4357 or helpdesk@princeton.edu. For issues regarding medical records or non-technical questions, go to the vaccinations FAQ or contact University Health Services at covidvaccines@princeton.edu.

Newly hired employees must enter their vaccination information or request an accommodation in VacStatus prior to their start date.

When entering their vaccine information in VacStatus, Employees may enter each dose at separate times or may enter both all at once. Employees should take an electronic photo or scan their vaccine card to upload into VacStatus. Staff appointed by University Health Services will review each vaccination card to verify accuracy. Individuals will be able to see that their vaccination card has been verified by logging into VacStatus.

If requesting an accommodation (e.g., exemption) to this requirement, Employees must log into VacStatus and complete the form requesting an accommodation. When completing this form, the Employee must identify the reason for such request – specifically, their own disability/medical condition or sincerely-held religious belief. The University will review the request in accordance with its regular policies and procedures.
Accommodations for COVID-19 vaccines include boosters. Employees who have been granted an accommodation for the primary vaccine do not need to apply again for the booster vaccines. Employees who did not receive an accommodation for COVID-19 vaccines may apply for an accommodation for a booster dose; applications will be reviewed carefully and in accordance with applicable University policy and law. Accommodations will not be granted on the basis of prior COVID-19 infection.

V. Violations

Employees will be in violation of this policy:

- If Employees fail to do one of the following: (1) upload a copy or photo of their vaccine card and enter their vaccine information via VacStatus, or (2) request an accommodation (e.g., an exemption) to this requirement based on their own disability/medical condition or sincerely-held religious belief by completing and submitting the Accommodation Request form found in VacStatus.
- If Employees fail to upload their booster dose information into VacStatus by January 31, 2022 or within 30 days of becoming eligible for a booster.
- If Employees provide false information to the University relating to their vaccine card or request for a Disability/Medical Accommodation or Religious Accommodation.
- If Employees fail to comply with the University's Public Health Requirements.

Employees found to be in violation of this policy may be subject to disciplinary action in accordance with applicable University policies.

As noted above, Disability/Medical and Religious Accommodations to the vaccination requirement will be provided in accordance with applicable University policy and law.

VI. Additional Resources

- Frequently asked questions (https://covid.princeton.edu/vaccinations#Vaccination-Questions)
- VacStatus Privacy Statement (http://kb.princeton.edu/KB0013165)

VII. Related Policies

- Rights, Rules, Responsibilities (https://rrr.princeton.edu/)
- Communicable Disease Policy (https://ehs.princeton.edu/Communicable-Disease-Policy)
- Face Coverings Guidance (https://ehs.princeton.edu/FaceCoveringsPolicy.html)

VIII. Update Log

Endorsed by Environmental Safety and Risk Management Committee on June 2, 2021.

Updated December 16, 2021.