

Policy Title: Employee COVID-19 Proof of Vaccination and Testing

Department: Human Resources

Chapter 4

Section 1

Policy 13

Effective Date Monday, November 1, 2021

POLICY STATEMENT

Ramsey County is committed to preventing the transmission of COVID-19 and creating a safe and healthy workplace for employees. All Ramsey County employees must certify to their vaccination status. Vaccinated employees are asked to provide proof of full vaccination against the COVID-19 virus. Employees who do not provide proof of full vaccination must undergo COVID-19 testing and provide proof of COVID-19 test results on a weekly basis. Any employee who tests positive for COVID-19 regardless of vaccination status must inform their supervisor and isolate at home until they can safely return to a county worksite.

Employees hired on or after November 1, 2021 are required to be fully vaccinated and submit proof of vaccination as a condition of their employment with Ramsey County. After a conditional job offer is made, job candidates must complete a certification of vaccination status form and submit proof of vaccination to the Human Resources Department before their start date. Religious and medical exemptions or reasonable accommodations to this requirement will be considered upon request by a job candidate as required by applicable law.

All employees regardless of vaccination status must also continue to comply with Ramsey County masking, social distancing or other safety protocols as determined necessary. This policy is subject to change at Ramsey County's discretion based on public health guidance. Employees may be subject to additional vaccination, screening or testing requirements under department specific policies and/or state or federal law.

APPLICABILITY

- This policy applies to all county employees, which includes elected officials.
 - Employees may also be subject to additional federal and state policies and guidelines around vaccination. All employees must certify to their vaccination status. Department employees who are subject to regular or mandatory screening and testing as a part of their work will continue to adhere to those testing and screening protocols in accordance with Centers for Disease Control (CDC) and the Minnesota Department of Health guidelines.

GENERAL INFORMATION

All employees are strongly encouraged to get vaccinated. Full vaccination remains the best way to protect oneself and others from contracting and experiencing significant impacts from COVID-19.

Confidentiality of Medical Information

Ramsey County must maintain the confidentiality of staff COVID-19 vaccination status and test results as provided by law. All information gathered under this Policy, including test results, vaccination status, certification forms, or other forms deemed necessary to carry out this policy must be retained by Human Resources according to the retention schedule and in a secure file separate from the employee's personnel file. Testing information may be shared with the Minnesota Department of Health, St. Paul-Ramsey Public Health (in cases of a COVID-19 outbreak), Human Resources, Ramsey County supervisors or managers with a need to know, or others authorized by law.

Nondiscrimination

Ramsey County will not tolerate retaliation, discrimination, and/or harassment based on vaccination status or for speaking out about unsafe working conditions or reporting a work-related illness or infection or exposure to COVID-19.

DEFINITIONS

Full vaccination; fully vaccinated

According to the CDC, in general, people are considered fully vaccinated against COVID-19:

- Two weeks after their second dose in a two-dose COVID-19 vaccination series approved by the U.S. Food and Drug Administration (“FDA”) or the World Health Organization (“WHO”);
- Two weeks after a single-dose COVID-19 vaccine approved by the FDA or the WHO.

Employees must provide proof of vaccination to be considered fully vaccinated. Employees who do not meet these requirements are NOT fully vaccinated.

Unvaccinated

Employees who do not meet the definition of fully vaccinated are considered to be unvaccinated; that includes employees who are partially vaccinated or who decline to provide vaccination status.

COVID-19 Test

A medical test to determine if someone has an active COVID-19 infection. Any test, including polymerase chain reaction (PCR) tests, antigen tests that are submitted to a lab for processing of test results, and/or self-administered rapid antigen tests are acceptable at this time.

Remote-first work environment

Under special or unique circumstances and a “remote-first” work environment declaration by the County Manager, employees are not expected to meet their onsite location requirements under the hybrid or mobile designation and may perform their work duties offsite.

RESPONSIBILITIES

All employees under this policy are responsible for complying with this policy. Failure to comply with this policy may be subject to discipline up to and including termination.

Department directors, managers and supervisors must ensure all employees in their department are informed of the scope and nature of this policy.

Human Resources staff and their designees will provide training, review and monitor compliance with this policy and work with department staff as necessary to ensure compliance.

PROCEDURES

Certification of Vaccination Status

All employees are required to complete certification of COVID-19 vaccination status using the [Self-Service page in the county's secure, online personnel and payroll system called Summit or My Summit](#). All current employees are required to complete the certification by November 1, 2021. The certification requirement applies to all employees regardless of their current work location.

New employees hired on or after November 1, 2021 will be required to complete the certification with new hire paperwork at the time of onboarding.

Employees Who are Vaccinated Against COVID-19

Employees who certify that they are fully vaccinated must upload proof of vaccination using the [Summit Self-Service page](#). Employees may upload the following:

- CDC COVID-19 Vaccination Record Card
- If an employee does not have their COVID-19 Vaccination Record Card, employees may submit documentation from the vaccination provider that includes the following:
 - Full Name
 - Date of Birth
 - Vaccine Manufacturer (i.e. Pfizer, Moderna, Johnson & Johnson, etc.)
 - Lot Number
 - Date of Vaccination, and
 - Site Location or Signature of Vaccine Administrator
- If vaccinated in another country, then an original or copy of an alternative official vaccination record, as proof of FDA- or WHO-approved COVID-19 vaccination status.

Authorized human resources personnel or their designees will review the certification form and proof of COVID-19 vaccination. Employees who certified to be fully vaccinated, but who did not submit proof of vaccination will be considered to be unvaccinated and must submit weekly testing results.

Employees hired prior to 11/1/2021, who certified confirmation of vaccination status and uploaded proof of full vaccination in Summit before 2/4/2022, were paid a \$100 taxable incentive.

Testing Procedures for Employees Who are Not Fully Vaccinated or Decline to Provide Proof of Full Vaccination

Employees who certify that they are unvaccinated or who decline to provide proof of full vaccination must undergo weekly testing starting November 1, 2021 and submit test results in [Summit's Self-Service portal](#).

Employees may test at home, onsite if onsite testing is available, or at any other acceptable testing facility. COVID-19 tests may be lab-processed PCR or antigen tests or self-administered rapid antigen tests. Available options for testing include: [community testing sites](#), [Minnesota Occupational Health](#), PCR or antigen testing at a clinic, hospital, or pharmacy, or [self-administered tests](#).

Once an employee receives their test results, a copy must be uploaded to the [Self-Service Portal in Summit](#). Test results may be an image from a cell phone or computer as long as the name of the employee is listed, as well as the testing date and the result. Test results must be uploaded at least once per week.

Employees may use up to one hour of work time to comply with the testing requirement with the supervisor's approval. Employees testing outside of work time will be reimbursed at a flat payment of \$15 per week.

Unvaccinated employees must continue reporting to work while they wait to receive their test results, except:

1. Employees who have been exposed to someone with COVID-19; or
2. Employees who are experiencing COVID-19 symptoms and/or test positive for COVID-19. See the section below, "Employees who Test Positive for COVID-19."

Test results will be maintained in a separate file from the Employee's personnel record in accordance with the retention schedule. Authorized human resources staff and their designees with a business need to know will have access to testing results. Test results may also be shared with St. Paul – Ramsey County Public Health or other health officials as necessary to ensure public safety.

Exceptions to Testing for Employees Who are Not Fully Vaccinated

Unvaccinated employees who have had a laboratory-confirmed case of COVID-19 within the past 90 days do not need to submit a weekly test for the 90 days after their diagnosis. This is because a case may test positive for many weeks after their symptoms have resolved. If the employee is still unvaccinated, they will need to resume weekly testing after the 90 days have elapsed. The employee must provide human resources/department designee documentation of a positive COVID-19 test result in order to be exempt from testing for 90 days.

Employees who are on vacation, who are out sick, or who are on another type of approved leave do not have to test or submit test results for the weeks they are absent from the workplace. If the employee is present any time during the work week, the employee must submit a test result for that week.

In the event of a “remote-first” work environment declaration by the County Manager, employees who are not fully vaccinated and designated as “Remote First” will not have to submit weekly testing results for any work week they are not working onsite. During Remote First work environment, employees voluntarily coming onsite or who are asked to report onsite for business reasons must submit COVID-19 test results for that work week.

Any employee who becomes fully vaccinated against COVID-19 or who did not previously certify to full vaccination, may complete a new certification form and present full proof of full vaccination against COVID-19 to be removed from the testing requirement.

Employees who Test Positive for COVID-19

Any employee who tests positive for COVID-19 regardless of vaccination status, must inform their supervisor and stay home and isolate until it is safe to return to work. Employees should refer to the [HR Guidance on COVID-19 Exposure and Leave Time](#) for isolation periods and leave authorized for this purpose. A positive COVID-19 test result will not be used as the basis for discipline or discharge.

Noncompliance with This Policy

Noncompliance with this policy may result in disciplinary action, up to and including discharge. The following constitutes noncompliance with this policy:

- Failure to complete the required certification of vaccination status;
- Failure to complete required weekly testing and/or submit weekly testing results in cases where the employee is not fully vaccinated;
- Providing false documentation of vaccination status or testing results;
- Improper disclosure of an employee’s vaccination or testing status to any individual who does not have a business need to know; or
- Any other violation of the requirements of this policy may result in discipline, up to and including discharge.

Employees in violation of this policy present a health and safety risk to the employer and may be placed on unpaid leave status until demonstrating compliance with policy requirements.

Requesting Reasonable Accommodations or Exemptions

Requests for reasonable accommodations or exemptions under the Americans with Disabilities Act or Title VII of the Civil Rights Act to these policy requirements due to disability or medical (including pregnancy-related) reasons, or sincerely held religious beliefs, practices, or observances will be received and evaluated on an individual case-by-case basis consistent with state and federal law.

Employees seeking a medical or religious accommodation or exemption must send an email to their [Human Resources Business Partner](#)/Generalist and include the following information:

- Name
- Department

- Supervisor
- Type of Exemption Requested: Medical or Religious
- For medical exemptions: Indicate what part of this policy you are unable to comply with and how it is related to your medical condition or disability under the Americans with Disabilities Act (ADA). Attach a doctor's note.
- For religious exemptions: Indicate which part of the policy you are unable to comply with because of a sincerely held religious belief. You do not need to include additional documentation.
- In all cases, Human Resources may ask for additional information if needed to understand or process your request.

Human Resources will work with the employee through an interactive process and the supervisor where needed to determine if an employee's exemption request can be granted and the employee can be accommodated without causing an undue hardship.

COMMUNICATION AND TRAINING PLAN

The certification form outlines the requirements of this policy and consequences of the policy and asks each employee to certify whether they have been vaccinated. By signing this certification, employees provide their vaccination status and indicate their acknowledgement and understanding of the policy and the consequences for noncompliance.

Training on the procedures will be available through the Learning Management System with resources including FAQs will be posted on the [Vaccine and Testing page of Ramseycounty.us](#).

AUTHORITY

- [Home Rule Charter, Sec. 3.02 - Powers and Duties of the County Manager](#)
- [Administrative Code, Chapter 3.30.00 - Powers and Duties of the County Manager](#)

LINKS AND RESOURCES

- [COVID-19 Vaccine Safety Information](#)
- [Centers for Disease Control \(CDC\) COVID-19 Vaccine](#)
- [Summit Self-Service](#) or [My Summit](#)
- [Vaccine Clinics](#)
- [FAQs - COVID-19 Vaccine and Testing Requirements Policy](#)

CONTACTS / SUBJECT MATTER EXPERTS

Human Resources

- HR Business Partners/Generalists: 651-266-2700 or RamseyNet page, [Human Resources Business Partners \(Generalists\)](#)
- Disability and Leave of Absence Administration: 651-266-2729

- Safety and Occupational Health Coordinator: [651-266-2929](tel:651-266-2929)
- Labor Relations Manager: [651-266-2728](tel:651-266-2728)

Public Health

- Public Health Safety and Occupational Health Coordinator: [651-266-1209](tel:651-266-1209)

REVISION HISTORY

Effective Date	Brief description of change	Name of Approver
May 24, 2022	Self-administered rapid antigen tests added to testing options. Clarified that Incentive pay ended 2/4/22.	Ryan O'Connor
Nov. 16, 2021	Addition of "remote-first" definition change of approver and inclusion of elected officials.	Ryan O'Connor
November 1, 2021	Original policy	Kathy Hedin

APPROVAL

Ryan O'Connor

County Manager

November 16, 2021