Bank Street College of Education COVID-19 Vaccination Policy

1. Purpose

Consistent with its duty and commitment to provide and maintain a safe and healthy workplace, Bank Street College of Education (Bank Street) has adopted this policy effective March 15, 2021 to take additional measures to protect the health and well-being of its employees and their families, students, visitors and others who spend time in our facilities, and the community, from the risks associated with COVID-19, including contracting and/or spreading the disease. This policy is intended to comply with applicable federal, state and local guidance and authority, including guidance from the Centers for Disease Control and Prevention (CDC) and public health and licensing authorities.

2. Scope

This policy applies to all employees of Bank Street. Any employees that are working remotely or currently on medical, parenting or other approved leave from Bank Street will be subject to this policy upon their return to work. This policy applies to the COVID-19 vaccines available as of the date of this policy or that will become available within a reasonable period of time. Although we strongly encourage all eligible students, visitors and others who spend time in our facilities to receive the COVID-19 vaccine, this policy applies only to employees. Any material changes to this policy will be communicated with employees as soon as available.

3. Policy

As the COVID-19 vaccine continues to become more widely available, the College will require employees eligible to receive the vaccine to (a) confirm it was received; or (b) obtain an approved exemption as an accommodation. The process for seeking an accommodation is explained below. Employees working in-person must meet the above requirements no later than September 1, 2021. Employees hired after this date will be granted a 30-day grace period to provide the required documentation that they are fully vaccinated for COVID-19. Employees who do not meet these requirements will be placed on unpaid leave and their status will be evaluated periodically.

To confirm that an employee has received a vaccine, the employee must present written proof of immunization from the vaccine administrator or a CDC-issued vaccination card. Bank Street regards all such information as confidential. Proof must be submitted through Employee Self Service in our Oracle HCM system and the instructions are linked here.

Employees are responsible for scheduling and obtaining all recommended doses of a COVID-19 vaccine granted Emergency Use Authorization by the FDA, or if available, an
FDA-approved COVID-19 vaccine. Employees may get the vaccine during their regularly scheduled work hours, if feasible.

Bank Street will pay non-exempt employees up to a maximum of four hours for each injection for time traveling to or spent getting the vaccine if done during regular work hours.

4. Accommodation and Exemption Requests

To assist any employee who has a disability, is pregnant, is a nursing mother, has a qualifying medical condition that contraindicates the vaccination, or objects to being vaccinated on the basis of a sincerely held religious belief or practice, Bank Street will engage in an interactive process to determine if a reasonable accommodation can be provided that does not create an undue hardship for Bank Street. If the reasonable accommodation process extends more than forty-five days without resolution, Bank Street may within its discretion extend the forty-five day deadline upon a showing of good cause by the employee.

If an employee believes they are entitled to a reasonable accommodation for one of the above reasons, it is the employee’s responsibility to request the reasonable accommodation in writing from the Human Resources Department contacting Angela Persaud, Benefits and Compliance Manager at apersaud@bankstreet.edu. Once Bank Street is aware of the request for an accommodation, Bank Street will engage in an interactive process to identify possible accommodations. Employees may request an accommodation without fear of retaliation. If an employee believes they have been treated in a manner not in accordance with this policy, please notify Bank Street immediately by contacting Elyse Matthews, Chief Human Resources Officer at ematthews@bankstreet.edu.

5. Genetic Information Privacy

The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting, or requiring genetic information from an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, Bank Street asks that you not provide any genetic information when responding to any request under this policy for medical information. “Genetic information,” as defined by GINA, includes:

- An individual’s family medical history,
- The results of an individual’s or family member’s genetic tests,
- The fact that an individual or an individual’s family member sought or received genetic services, and
- Genetic information of a fetus carried by an individual or an individual’s family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.
6. **Policy Modification**

Government and public health guidelines and restrictions and best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available, further research is conducted, and additional vaccines are approved and distributed. Bank Street reserves the right to modify this policy at any time without prior notice in its sole discretion to adapt to changing circumstances or institutional needs, consistent with its commitment to maintaining a safe and healthy workplace.

7. **Employees Covered By a Collective Bargaining Agreement**

This Policy works in conjunction with, and does not replace, amend or supplement any terms or conditions of employment stated in any collective bargaining agreement that a union has with Bank Street.