

January 12, 2021- We continue to learn more about the role of the employer as we move through the Massachusetts vaccination roll out. This guidance document provides issues and areas for consideration that employers MAY need to consider.

Designate a Human Resources employee to handle vaccination-related questions.
Determine if COVID vaccinations will be covered under your health plan.
Understand the laws that may protect an employee who is unwilling or unable to receive a vaccination.
<ul> <li>Americans with Disabilities Act</li> <li>Title VII of the Civil Rights Act – an exemption may be possible due to religious beliefs</li> <li>Pregnancy Discrimination Act</li> <li>National Labor Relations Act</li> </ul>
Review the accommodations you may be able to make in cases where an employee is unwilling or unable to receive the recommended or required vaccination.
Prepare to safely store vaccination and medical records, if required by federal or state law or local boards of health.
Include a Vaccination Policy in your employee handbook. Please see the link below.
Determine whether all employees will be required to get a vaccination or if it will be based on job title, job location, or another non-discriminatory factor. Job descriptions may need to be updated to include specific requirements.
Understand travel vaccination requirements for any employees who must travel internationally for business.
Explore whether it is feasible to offer vaccinations on-site, similar to a flu clinic, or if you will offer additional paid or unpaid time off to employees to get vaccinated. Vaccine resources may be available through your health insurer, worker's comp carrier or local board of health. Even if an employer brings vaccinations on-site, an employee can still decide to go through their preferred provider.
Ensure compliance with state and federal laws that protect employees from retaliation or disciplinary action based on vaccination-related employment actions.

A sample vaccination policy is available through the <u>AIM HR Solutions annual Handbook Subscription Service</u>. For additional information on AIM HR Solutions services, please contact Kelly McInnis at <u>kmcinnis@aimhrsolutions.com</u>.