



Covid-19 Vaccination Policy

Purpose

As a human services organization with the mission People First, we bear a significant responsibility to do everything we can to create a safe workplace and protect those we serve. Moreover, Hilltop's culture hinges on strong human connections and a sense of community. This policy, based on guidance and recommendations issued by the Centers for Disease Control and Prevention (CDC), other public health authorities, and regulatory and licensing authorities, is intended to protect Hilltop employees, volunteers, residents, participants, ensure we can adequately staff our programs and move toward a future where we can safely come together and support one another.

We believe the most effective way to accomplish this purpose is to require a full COVID-19 vaccination of all employees and volunteers as a condition of employment or volunteer service. The COVID-19 vaccine has been determined to be a safe and effective measure for preventing COVID-19 infection.

Policy

This is intended as a corporate policy. Individual program regulations that are more stringent may supersede parts of this policy. Moreover, as the realities the pandemic change, this policy may be updated to ensure its stated purpose.

Scope and Proof of Vaccination

- As of November 1, 2021, Hilltop requires all employees and volunteers to obtain and maintain up-to-date COVID-19 vaccinations as a condition of employment or service. This includes:
 - An initial two-dose vaccine or single-dose Johnson & Johnson vaccine;
 - An initial single booster vaccine as recommended by the Advisory Committee on Immunization Practices (ACIP) and the Centers for Disease Control (CDC); and
 - Future booster vaccines as required by regulations and/or licensing.
- All employees and volunteers must provide written proof that they have been fully vaccinated against COVID-19 and have received their initial single booster. Employees



Covid-19 Vaccine Policy 2021

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and volunteers must provide proof of vaccination to their Hilltop program's designee in one of the following forms:

- CDC COVID-19 Vaccination Card
- Electronic Medical Record documentation
- State vaccination database documentation from CIIS for Colorado.
- Employees should not provide proof of vaccination that includes any genetic information (e.g., family medical history).
- New hires must present proof of a first dose of the COVID-19 vaccination PRIOR to working on site at any Hilltop location and sign an attestation that they will receive their second dose, as applicable, within four (4) weeks of the first dose.
- All employees and volunteers must receive their initial single booster within 30 days of becoming eligible.
- Any documentation received by an employee will be kept confidential to the extent required by law.

Medical Exemptions

- Hilltop employees or volunteers with specific medical reasons may qualify for exemption/reasonable accommodation.

Medical exemptions/accommodations for the COVID-19 vaccine will be considered if the employee provides a completed Hilltop Request for Medical Exemption Form signed by a Colorado licensed, treating medical provider - a physician (MD or DO), advanced practiced registered nurse, physician's assistant (PA), clinical nurse specialist, or certified midwife that includes a clinical note with one of the following:

- The applicable CDC contraindication for the COVID-19 vaccine, **or**
- The applicable contraindication found in the manufacturer's package insert for the COVID-19 vaccine, **or**
- A statement that the physical condition of the person or medical circumstances relating to the person are such that immunization is not considered safe, indicating the specific nature and probable duration of the medical condition or circumstances that contraindicate immunization with the COVID-19 vaccine.
- Hilltop will review medical exemption requests on a case-by-case basis, balancing these requests with overall workplace safety and wellbeing. Any medical information concerning an employee's or volunteer's limitations and/or reasonable accommodation needs will be kept in strict confidence in compliance with applicable federal, state, and local laws. Employees and volunteers may request an exemption without fear of retaliation.



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Religious Exemptions

- Religious exemptions/accommodations for the COVID-19 vaccine will be considered if the employee provides a completed Hilltop Request for Religious Exemption Form to the People Operations Business Partner or Director. It is important to note, Hilltop may be unable to accommodate your request due to the health and safety of our residents/participants/volunteers/coworkers, or undue hardship to the company.

Compensation

- Employees will be paid their hourly rate for the time spent waiting and getting the COVID-19 vaccination, as well as for the waiting time after receiving the vaccine to monitor for an adverse reaction to the vaccine.
- If an employee receives a vaccine at a location separate from work, the employee will also be compensated for the time traveling to and from a Mesa or Montrose/Delta County vaccination site.
- Should an employee experience post-vaccine symptoms that prevent them from working regularly scheduled shifts, time off may be paid under the Public Health Emergency Leave policy (if in effect).

Non-compliance

- A current or new employee who does not provide proof that they have been fully vaccinated for COVID-19 (e.g., received two doses or the single-dose Johnson & Johnson) or have received their required booster in the timeframes indicated under “Scope and Proof of Vaccination” will be considered non-compliant with this policy.
- Non-compliance will result in a request from the employee for either a detailed written and signed plan to become compliant or a resignation.
- Failure of an employee to provide a written plan to become compliant or a resignation will result in termination of employment.



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