

Requiring COVID-19 Vaccines at the ASPCA

October 2021

CONFIDENTIAL

OBJECTIVE:

- All ASPCA staff, interns, and externs are required to be fully vaccinated (as defined below), unless they have requested and received an accommodation due to a disability or other medical condition that prevents vaccination, or due to a sincerely held religious belief, practice or observance that prevents vaccination, in accordance with applicable law. All contingent workers (including volunteers, temps, responders, and contract workers) are also required to be fully vaccinated (as defined below).
- All newly hired staff or newly assigned contingent workers will be required to comply with this policy as a condition of employment or prior to being assigned to perform services on the ASPCA's behalf.
- This policy will be applicable nationwide, except where prohibited by applicable law.

WHY:

- We are adopting this policy to safeguard the health of our staff and clients, and to ensure that we can all do our work most effectively, positively impact the most animal lives, and support the health and safety of the communities we work within.
- The safety and health of our people is our top priority and, we believe, also enables us to fulfill our responsibilities and mission on behalf of animals.
- We believe it is in the best interest of the animals we serve to have safe and healthy staff and contingent workers.
- We seek to return our operations to "normal" as promptly as possible, while ensuring that we operate in a manner consistent with federal, state and local health and safety laws and guidelines.
- In implementing this policy, the ASPCA will comply with all applicable laws and follow guidance from the Centers for Disease Control and Prevention and local health authorities, as applicable, and as each may be modified over time. The ASPCA continues to monitor requirements, including federal and state vaccine requirements, and our policy anticipates the needs to have some requirements in place in the near future.

WHAT/HOW:

- This policy will apply to all staff nationwide, including those who do not regularly report to an ASPCA office location, as we need the flexibility to ensure that we can have any of our staff travel, interact with colleagues, or deploy on short notice, if necessary for business purposes. Additionally, this policy will be applied to the entire workforce to facilitate the ASPCA's administration/enforcement of the policy, and to ensure equitable treatment of ASPCA colleagues regardless of their individual work location.
- Employees will be required to be fully vaccinated by 1/3/22. Staff members will be required to upload proof of vaccination in Workday.
- Contingent workers (i.e. individuals who are NOT employees but who do work for the ASPCA in various categories) will be advised separately of the date by which they need to be fully vaccinated and the means by which they will be required to provide proof to the ASPCA that they are fully vaccinated. Contingent workers will be provided with reasonable notice in order to comply with this policy.
- Proof of vaccination will be maintained by the ASPCA securely, confidentially, and electronically.
- **For purposes of this policy only**, the ASPCA is not requiring the 2-week period after the vaccine(s) has been fully administered for individuals to meet this policy's requirement that they are "fully vaccinated." Instead, solely for purposes of this policy, an individual is considered "fully vaccinated" when they meet both of these conditions: (a) the individual has received their second dose of any two-dose vaccines, or their single shot of any

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one-dose vaccine, and (b) the staff member has uploaded proof of vaccination in Workday, or the contingent worker has provided proof of vaccine by the means required of them by the ASPCA.

- In the event the Center for Disease Control and Prevention issues guidance that effectively modifies what it means to be fully vaccinated, this policy will be supplemented accordingly.
- To the extent required by applicable law, the ASPCA will accommodate staff, interns, and externs who cannot be vaccinated because of their disability or sincerely held religious beliefs, unless doing so would pose a direct threat to the individual requesting accommodation or others in the workplace, or create an undue hardship for the ASPCA.
- Those staff, interns, and externs who may be entitled under applicable law to medical or religious accommodations because they are unable to be fully vaccinated as required by this policy must request an accommodation from the People Team (requests for medical accommodations will be handled by the Benefits team; requests for religious accommodations will be handled by People Partners) by emailing the Benefits Team or People Partner, as applicable, as soon as possible, but no later than October 22, 2021 (or at the time of receiving an offer letter or acceptance into an internship or externship program). Anyone who submits an email request for an accommodation must then complete forms provided by the ASPCA for this purpose, and may also be required to respond to follow-up questions and requests for additional information from the ASPCA, all of which must be completed on a timely basis by the individual requesting accommodation.
- Staff, interns, and externs who are not fully vaccinated by the applicable deadline (and who have not been approved for accommodation, if eligible under applicable law) will no longer be qualified for employment with the ASPCA, and will be deemed to have resigned.
- Contingent workers who are not fully vaccinated by the applicable deadline (and who have not been approved for accommodation, if eligible under applicable law) will no longer be permitted to provide services to the ASPCA.
- Applicants for employment with the ASPCA who have received an offer letter, as well as those who have been accepted into an internship or externship program with the ASPCA, will not be permitted to commence employment or to participate in such program, if they are not fully vaccinated by the applicable deadline and have not been approved for accommodation. In such cases, the ASPCA will withdraw its offer of employment or its invitation to participate in such programs.
- Staff members may get the vaccine during their regularly scheduled work hours and will be paid for time taken to receive COVID-19 vaccinations, up to a maximum of four hours per vaccine dose. Staff may also use COVID-19 time-off (or any other accrued time off balance available) if unable to work following a vaccine dose due to any side effects.

Government and public health guidelines and restrictions, as well as employer best practices regarding COVID-19 and COVID-19 vaccines, are changing rapidly, sometimes with little or no notice to employers or the public at large. The ASPCA reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace, for the benefit of our staff and contingent workers, the animals we serve, and the communities we work within.

Please direct any questions regarding this policy to the People Team.