

COVID-19 Vaccination Policy

Purpose

Consistent with its duty to provide and maintain a workplace that is free of recognized hazards, Developing Potential, Inc. ("the Company") has adopted this policy to safeguard the health and well-being of employees and their families, as well as others who spend time in locations where DPI provides services, from the risks associated with COVID-19. This policy is intended to comply with all federal, state and local laws. It is based upon guidance provided by the Occupational Safety and Health Administration (OSHA), the Centers for Disease Control and Prevention (CDC) and other public health and licensing authorities, as applicable.

Scope

This policy applies to all employees, contractors, temporaries, and consultants who are required to be onsite as part of the work performed by DPI. Personnel who are required to be onsite due to the nature of their duties will be covered by this policy. This policy also applies to any employee who chooses to attend a Company-sponsored event.

Policy

Beginning October 5, 2021, the Company will expect all covered employees to either (a) establish that they have been fully vaccinated with respect to COVID-19; or (b) obtain an approved exemption from the policy as an accommodation through Human Resources. The process for requesting an exemption/accommodation is explained below. For purposes of this policy, an employee is considered fully vaccinated two weeks after receiving the second dose of a two-dose vaccine or one dose of a single-dose vaccination. In the future, the Company may also change vaccination requirements, including but not limited to requiring a "booster" vaccine shot, for employees to retain their full vaccination status, if the Company deems it necessary based on guidance from public health authorities.

Employees who do not fulfill one of these two requirements will be placed on unpaid leave and their employment may be subject to termination.

To establish that they are fully vaccinated, employees may present a completed COVID-19 Vaccination Record Card for inspection by an authorized Company representative in the Human Resources department, or otherwise provide a reliable verification of vaccination. The Company will treat all such information as confidential to the extent required by applicable law.

To facilitate employees' ability to receive the vaccination, the Company will consider timely requests for appropriate schedule changes. In accord with its time-keeping policies, the Company will also pay non-exempt employees for time spent receiving the vaccination. Additionally, the Company will reimburse employees for the cost, if any, of receiving the vaccination, contingent upon receipt of appropriate supporting documentation.



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Requests for Exemptions as Accommodations

Employees who cannot receive a COVID-19 vaccination due to a medical contraindication, or due to sincerely held religious beliefs or practices, may request an exemption from this policy. For current employees, exemption requests must be submitted to Human Resources by October 15, 2021. Individuals who are not current employees but who have been extended an offer of employment must seek an exemption prior to beginning employment.

Medical Exemption Requests

Employees who are requesting an exemption due to a medical contraindication must complete a Request for Medical Exemption/Reasonable Accommodation Form and provide proof in the form of a letter written by a physician that has current details of the medical contraindication. Only evidence-based medical contraindications against vaccination confirmed by healthcare providers will be accepted as valid requests.

Religious Exemption Requests

Employees requesting an exemption due to religious beliefs or practices must complete the Request for Religious Exemption/Reasonable Accommodation Form and outline the specific faithbased objections to vaccination. Employees must also provide documentation supporting the objections. Personal preference does not constitute a valid religious exemption request.

Exemption/Accommodation Process

As part of an interactive process that begins with an employee's submission of an exemption request form, Human Resources will evaluate each request for exemption and determine whether the Company can grant the exemption as a reasonable accommodation that enables the employee to perform the essential functions of his or her position, without imposing undue hardship on the Company, and without the employee posing a direct threat to the health or safety of the employee or others. This will be reviewed to remain current and in accordance with federal, state and local mandates. During this process, Human Resources may ask questions and ask for additional information or clarification from the employee regarding the exemption request. After completing its evaluation, Human Resources will notify the employee of the Company's determination.

Note, if the employee's exemption request is approved, such approval may require compliance with certain conditions that help mitigate the risk of virus transmission, and which are deemed necessary by the Company to grant the exemption/accommodation. In addition, the exemption may be allowable for a certain time frame, meaning having an expiration date as it relates to the COVID 19 pandemic.



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This may include the wearing of additional personal protective equipment (including but not limited to masks and/or other face coverings), changes to the nature of the job duties performed by the employee, reassignment, decrease in work hours, or other applicable alternatives.

Renewal of Exemption Requests

Once an employee is granted a religious exemption as an accommodation, the employee does not have to reapply for the exemption unless facts and circumstances indicate that the employee is engaging in actions inconsistent with the employee's stated beliefs or practices, or if the employee's beliefs or practices have changed.

If an exemption is granted for a temporary health condition, a new request for exemption must be submitted each year to which the condition applies. If exemption is granted for a permanent condition, the exemption does not need to be requested each year unless available information or recommendations from public health authorities indicate to the Company that the circumstances justifying the exemption have changed.

No Retaliation

The Company does not authorize, and in fact prohibits, any form of retaliation against an employee for submitting an exemption request under this policy.

Compliance with Safety Measures

To minimize risk and ensure health and safety for staff and program participants, and in accordance with the Federal Mandate by the President, an employee that choses not comply with the Covid vaccine policy, and qualifies for an exemption must submit to COVID testing twice weekly as of October 18th, 2021.

An approved COVID 19 test must be performed and reflect a negative result and provided by the employee as prescribed noting no symptoms or positive exposures.

Failure in providing the negative test results by 8 a.m. Monday and Thursday each week to <u>hrdpi@developingpotential.org</u> and the employee's direct supervisor will result in a non- approved work day(s).

As of October 18, 2021, if the person is a program participant of DPI and non vaccinated, the person served will have to provide to the DPI Nursing staff at <u>Cburke@developingpotential.org</u> by Monday and Thursdays a negative Covid test to be able to attend onsite for regularly scheduled programming. PCR/ NAAT test must be done and the person must provide a valid test result showing negative results and a covid program participant questionnaire noting no symptoms or positive exposures.