

Effective Date: January 10, 2022

SUBJECT: MANDATORY COVID-19 VACCINATION

POLICY:

The health and wellbeing of St. Mary's Seminary and University faculty, staff, seminarians, and EI students are critical to maintaining operations during the COVID-19 pandemic. Therefore, effective January 10, 2022, all faculty, staff, seminarians, and EI students (collectively, Community Members) must be fully vaccinated* against COVID-19 unless they have received a medical or religious exemption pursuant to the procedures set forth below. This policy does not apply to Community Members who will never be present on Campus or interact with other Community Members (for example, EI students taking remote classes only).

*Consistent with the definition applied by the Centers for Disease Control and Prevention, as used in this policy, a person is considered fully vaccinated against COVID-19 two or more weeks after receipt of the second dose in a two-dose series (Pfizer-BioNTech and Moderna) or two or more weeks after receipt of the single dose of the Johnson & Johnson/Janssen vaccine.

PROCEDURE:

- 1.) Community Members shall provide documentation which verifies that they have been fully vaccinated against COVID-19. This documentation must be provided on or before January 10, 2022 as follows: staff members shall submit proof of vaccination to Betty Visconage; faculty members and seminarians shall submit proof of vaccination to Fr. Paul Maillet; and EI students shall submit proof of vaccination to the Associate Dean of Administration for the EI. Proof of vaccination need not be resubmitted if it was provided previously. Community Members who were unvaccinated as of the date of issuance of this policy shall submit proof of receiving the first dose of a COVID-19 vaccine by January 10, 2022 and shall thereafter submit documentation demonstrating that they received timely the second dose of a two-dose vaccine (if applicable). Acceptable proof of vaccination status includes:
 - a. The record of immunization from a health care provider or pharmacy;
 - b. A copy of the COVID-19 Vaccination Record Card;
 - c. A copy of medical records documenting the vaccination;
 - d. A copy of immunization records from a public health, state, or tribal immunization information system; or
 - e. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the health care professional(s) or clinic site(s) administering the vaccine(s).

- 2.) Vaccines are provided at no-cost by the State of Maryland.
- 3.) All employees will be allowed up to four hours of paid time off to receive a vaccination. Offsite vaccinations requiring time away from work should be scheduled through an employee's supervisor.
- 4.) All Community Members must be vaccinated unless they have obtained an exemption.
- 5.) Staff members seeking an exemption from vaccination shall submit a request in writing to Betty Visconage; Faculty members and seminarians shall submit a request for exemption to Fr. Paul Maillet; and EI students shall submit a request for exemption to the Associate Dean of Administration for the EI. All exemption requests must be submitted on or before January 10, 2022. Exemption from vaccination will be granted only to (1) Community Members for whom the COVID-19 vaccine is medically contraindicated (consistent with CDC Guidance and following review by St. Mary's Medical Review Committee), or (2) Community Members who demonstrate sincerely held religious beliefs that conflict with receiving vaccinations (except that seminarians, Catholic religious, and faculty members for whom adherence to Catholicism is an occupational qualification may not receive a religious exemption). Community Members are required to provide documentation supporting any exemption request. In the case of a medical exemption, documentation shall include a doctor's note establishing the CDC recognized medical contraindication. In the case of a religious exemption, the documentation shall include a letter from a clergy member or other religious leader supporting the request, a letter from the Community Member's doctor indicating that the Community Member has consistently declined vaccination on religious grounds, and/or an explanation of why vaccination would conflict with the Community Member's sincerely held religious beliefs. Each request for exemption will be evaluated individually and the Community Member notified in writing that the request has been approved, denied, or if additional information is required. No adverse action will be taken against a Community Member for failure to receive a vaccination while a timely request for exemption is being reviewed.
- 6.) Employees on approved leave because of workers compensation leave, disability leave, or other leave of absence must be fully vaccinated prior to returning to campus.
- 7.) New Community Members (*e.g.*, employees hired after the vaccination deadline) will be notified of the mandatory vaccination policy and required to be vaccinated prior to entering the campus.
- 8.) Community Members who receive an approved exemption shall be required to undergo regular COVID-19 testing if present on Campus. This testing regime is in conformity with CDC guidelines and the practice of other colleges and universities, schools and businesses.
Exempted Community Members who report to Campus at least once every seven days:
 - a. must be tested for COVID-19 at least once every seven days; and
 - b. must provide documentation of the most recent COVID-19 test result to Betty Visconage every Monday, and in no case later than the seventh day following the date on which the Community Member last provided a test result.Exempted Community Members who do not report to Campus during a period of seven or more days:
 - c. must be tested for COVID-19 within seven days prior to returning to Campus; and
 - d. must provide documentation of that test result to Betty Visconage 72 hours before returning to Campus.

If a Community Member does not provide documentation of a COVID-19 test result as required by this policy, they will be removed from Campus until they provide a test result. St. Mary's may, in its sole discretion, allow Community Members who have received a positive COVID-19 test, or have been diagnosed with COVID-19 by a licensed health care provider, to refrain from COVID-19 testing for up to 90 days following the date of their positive test or diagnosis.

- 9.) Community Members are responsible for obtaining their own COVID-19 tests, and except as required by law, St. Mary's will not reimburse unvaccinated Community Members for the cost of such tests. Community Members are encouraged to consult with their local health departments for information about where to obtain free testing. St. Mary's will accept the results of any COVID-19 test that is cleared, approved, or authorized, including in an Emergency Use Authorization, by the U.S. Food and Drug Administration, with the exception of self-administered, self-read rapid tests that are available over-the-counter. COVID-19 tests must be administered in accordance with authorized instructions.
- 10.) Community Members who are not fully vaccinated must wear face coverings over the nose and mouth when indoors and when occupying a vehicle with another person for St. Mary's purposes. The following are exceptions to St. Mary's requirements for face coverings:
 - a. When a Community Member is alone in a room with floor to ceiling walls and a closed door.
 - b. While a Community Member is eating or drinking on Campus or for identification purposes in compliance with safety and security requirements. For the safety of fellow Community Members, the following procedure is in place: anyone not vaccinated who has received a medical exemption will not be prohibited from taking meals in the Refectory. A special section will be set up in the Refectory with appropriate social distancing for those who have not been vaccinated during regular meal times. Those who have been vaccinated will be encouraged to take meals in that section as well as in the section reserved for those who have been vaccinated to maintain inclusion of all in community life and to allow for table fellowship for all.
 - c. When a Community Member is wearing a respirator or facemask.
 - d. Where St. Mary's has determined that the use of face coverings is infeasible or creates a greater hazard (*e.g.*, when the use of a face covering presents a risk of serious injury or death to an employee).
 - e. These face-covering requirements shall also apply when federal, state, or local health authorities or St. Mary's administration determines that all persons, regardless of vaccination status, should wear face coverings to support health and wellness in the community.
- 11.) All medical information collected from Community Members, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.
- 12.) The Seminarian COVID Response Committee will be reactivated at the beginning of the spring semester in January. The purpose of the Seminarian Committee will be an ongoing discussion of the seminary's COVID policies and how the seminarian body can assist in the seminary's response to the pandemic.

13.) A seminarian will be appointed to the seminary COVID Response Committee (the advisory committee that proposes policies and procedures and concrete steps in responding to the COVID pandemic and all aspects of the risks posed by the COVID-19 virus and its variants).

Non-Compliance with Policy

A Community Member will be considered non-compliant if he or she refuses to obtain the vaccine when required, unless exempt in accordance with this policy.

Community Members who fail to comply with the policy will be suspended and/or denied access to Campus until they have been vaccinated or have obtained an exemption. Failure to be vaccinated or to obtain an exemption within two weeks from the beginning of his or her suspension may result in the Community Member may be expelled or terminated, as applicable. EI students who are non-compliant with this policy will be permitted to participate in remote learning only.

Right to Change or Terminate Policy

St. Mary's reserves the rights to change/modify this policy. This policy will remain in effect until the conclusion of the COVID-19 pandemic.

St. Mary's may implement further or additional mitigation measures to slow the spread of COVID-19 and support Campus safety in consultation with medical experts and in compliance with federal, state, and local policies related to COVID-19 and current CDC guidance.