



University of Colorado **Anschutz Medical Campus**


**Campus Administrative Policy**

**Policy Title: COVID-19 Vaccination Requirement and Compliance**

**Policy Number:** 3012

**Functional Area:** **General Administration**

Effective:	September 24, 2021
Date Last Amended/Reviewed:	September 24, 2021
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Supersedes:	COVID-19 Vaccination Requirement and Compliance September 1, 2021

Approved by:	Donald M. Elliman, Jr.  Chancellor, University of Colorado Anschutz Medical Campus
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Prepared by:	Office of University Counsel
Reviewing Office:	Office of the Chancellor of the CU Anschutz Medical Campus
Responsible Officer:	Executive Vice Chancellor for Administration and Finance   CFO, University of Colorado Anschutz Medical Campus

Applies to:	CU Anschutz Medical Campus
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**A. INTRODUCTION**

The purpose of this policy is to protect the health and safety of the University of Colorado Anschutz Medical Campus (“CU Anschutz”) community, including all faculty, staff, students, badged affiliates, persons of interest (POIs), visitors, and volunteers (“Individuals”) who work or learn on the Anschutz Medical Campus or off campus in connection with CU Anschutz programs. This policy requires all Individuals who currently or may in the future access any CU Anschutz facility or participate in any CU Anschutz program, or whose employment or academic activities may require in-person interaction with other CU Anschutz employees, students, patients, study subjects, or members of the public, regardless of location, to become fully vaccinated against COVID-19 with a vaccine that has been approved by the World Health Organization (“WHO”) as of June 1, 2021, subject to limited exceptions and exemptions.<sup>1</sup> In addition, this policy requires Individuals to receive booster shots for those specific vaccines, as required or recommended by the WHO or Centers for Disease Control.

All faculty, staff, badged affiliates, and POIs must submit proof of COVID-19 vaccination prior to the individual’s start date or prior to accessing or participating in any CU Anschutz program.

<sup>1</sup> As of June 1, 2021, the WHO has approved the following COVID-19 vaccines: Pfizer-BioNTech, Moderna, Johnson & Johnson, Oxford–AstraZeneca, Sinovac, and Sinopharm.

Students must submit proof of COVID-19 vaccination in accordance with their program deadline, which varies by program. Students who will initially participate in University-related activities remotely will be required to submit proof of COVID-19 vaccination before starting any in-person component of their curriculum whether on campus, or at a clinical site or remote location. Individuals who do not provide proof of vaccination may be subject to additional safety protocols as described more fully below.

## **B. DEFINITIONS**

1. The term “employees” includes, but is not limited to, all full and part-time staff, faculty, post-doctoral fellows, medical residents, predoc trainees, and fellows.
2. The term “badged affiliates” includes, but is not limited to, any individual who has a CU Anschutz badge to access campus facilities, whether leased or owned on or off campus, including badged contractors and employees at affiliated institutions who have a CU Anschutz badge and access campus facilities on a regular basis.
3. The term “students” includes, but is not limited to, all students, including part-time, full-time, degree-seeking, non-degree seeking, hybrid (combination of online and in person, either: (i) on campus and/or (ii) in clinical settings), visiting students, undergraduate, or graduate students enrolled at CU Anschutz.

## **C. POLICY STATEMENT**

All Individuals, who are, or may access any University facility or participate in any University program, or whose employment or academic activities may require in-person interaction with other CU Anschutz employees, students, patients, study subjects or members of the public, including external conferences, regardless of location, must be fully vaccinated against COVID - 19 unless they have received an approved medical or religious accommodation as further described below. Individuals are required to comply with this Policy, regardless of the Individual’s frequency on campus or interaction with other employees, students, patients, or others. For example, even a one-time visit or interaction requires compliance.

Positions or programs that require on-campus presence or interaction with others will not be allowed to be performed remotely in order to avoid compliance with this Policy. However, Individuals who hold positions that have been previously approved by a supervisor as being 100% remote without any current or future presence at any CU Anschutz facility (owned or leased) or participation in any Anschutz program, or whose employment or academic activities do not require in-person interaction with other CU Anschutz employees, students, patients or study subjects of the Anschutz Medical campus, regardless of location, are not required to be

comply with this policy. Schools, departments, and units may implement additional rules, and requirements, related to university business that takes place off-campus. It is recommended that university events that are held off-campus follow the university safety protocols, including, but not limited to wearing masks, social distancing, and not attending if feeling sick.

## **1. Vaccine Verification**

All Individuals must submit verification of COVID-19 vaccination. Employees, badged affiliates, POIs, and volunteers must submit verification of their COVID-19 vaccination via the campus [verification system](#). Submission of false or fabricated vaccine information may be grounds for discipline, including termination of employment or dismissal from a program. Visitors will not be required to submit verification via the campus verification system, but will be required to submit verification to the department or unit hosting their visit. It is the responsibility of the unit who is hosting the visitor to ensure the visitor's compliance with this Policy. Students must submit proof of COVID-19 vaccination to their individual Schools/College/programs in the same manner that they would submit proof of other required vaccinations.

In the absence of an approved medical or religious accommodation under Section 2 of this Policy, an Individual's failure to provide valid proof of vaccination may lead to discipline, up to and including termination. Schools, departments, or individual units may require additional documentation verifying vaccine status, beyond what is required by the campus verification system, including providing a vaccine card.

## **2. Accommodations**

Individuals may receive a medical or religious accommodation if they are unable to receive the vaccine for medical reasons or sincerely held religious beliefs as further described below. Supervisors and unit heads will be made aware that an Individual has received an accommodation, but will not be aware of the reason for the accommodation.

A medical accommodation may be granted if vaccination is absolutely contraindicated due to other medical conditions.<sup>2</sup> A Physician (MD, DO), Advanced Practice Nurse (APN), or Physician Assistant licensed in Colorado, must sign the medical exemption form and attest to the accuracy of the information contained therein. Employees, badged affiliates, visitors, and volunteers must submit their medical exemption forms via the approved campus database, which is a campus-wide platform. Students must submit their medical exemption forms to their individual Schools/College/programs in the same manner that they would submit exemptions for other required vaccinations. A medical accommodation will not be granted, if the accommodation poses an undue hardship or the accommodation poses a direct threat to the health or safety of the Individual or others.

A religious accommodation may be granted based on an employee's religious beliefs. Employees must submit their religious accommodation request form via the campus

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<sup>2</sup> Currently, the only absolute contraindications to COVID-19 vaccination are i) severe immediate allergic reaction to a previous dose or to a component of the COVID-19 vaccine, ii) immediate reaction of any severity to a previous dose or known (diagnosed) allergy to a component of the COVID-19 vaccine.

[verification system](#). A religious accommodation will not be granted if the accommodation would unduly burden the health and safety of other Individuals, patients, or the campus community.

Religious accommodations are not currently available to students or applicants.

Individuals who are granted medical or religious accommodations will be required to adhere to additional safety protocols, including, but not limited to wearing masks, social distancing, staying home when sick, quarantining in accordance with current Centers for Disease Control (“CDC”) guidance, submitting daily attestations, and undergoing frequent asymptomatic testing.<sup>3</sup>

Unvaccinated Employees, Badged Affiliates, or POIs who fail to complete the COVID - 19 verification form or comply with required safety protocols for accommodated individuals will be referred to their Supervisor for potential action and/or discipline, up to and including termination. Supervisors will be required to provide Campus Human Resources with information regarding such action and/or discipline with respect to unvaccinated employees.

Unvaccinated students who fail to submit verification of vaccination or comply with required safety protocols for accommodated individuals may be referred to their respective School/College/program for potential action and/or discipline, up to and including termination from the program. Schools/College/programs will be required to provide the Associate Vice Chancellor for Student Affairs at CU Anschutz with information regarding such action and/or discipline.

Individuals who are not vaccinated and do not have an approved medical or religious accommodation, will not be allowed to access University facilities or programs in person. Individuals who previously tested positive for COVID-19 will not be granted an accommodation unless they obtain a note from a physician or health care provider that indicates vaccination is absolutely contraindicated.

The COVID-19 pandemic and its impact on campus operations is rapidly evolving. Individuals are encouraged to consult the COVID-19 website referenced in Section D(4) below on a regular basis for up-to-date information regarding CU Anschutz’ COVID-19-related policies, procedures, and guidance.

### **3. Reasonable Accommodations under the ADA**

CU Anschutz recognizes that some medical conditions may be protected under the Americans with Disabilities Act and amendments (“ADA”), entitling students and employees to request reasonable accommodations.

If you are a student at the CU Anschutz Medical Campus and need to make an

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<sup>3</sup> Currently, Individuals who are required to submit to ongoing asymptomatic testing will be required to do so on a weekly basis, but the frequency of testing is subject to change at CU Anschutz’ discretion based on evolving medical and scientific recommendations.

application for reasonable accommodations or need information regarding the ADA, contact the Office of Disability Access and Inclusion at (303) 724-5640 or [disabilityresources@cuanschutz.edu](mailto:disabilityresources@cuanschutz.edu).

If you are an employee and need to make an application for reasonable accommodations or need information regarding the ADA, contact the ADA Coordinator at (303) 315-2700 or [HR.ADACoordinator@ucdenver.edu](mailto:HR.ADACoordinator@ucdenver.edu).

**D. RELATED POLICIES, PROCEDURES, FORMS, GUIDELINES, AND OTHER RESOURCES**

1. Related Administrative Policy Statements (APS) and Other Policies
  - [Campus Policy 7014: Student Immunization Requirements and Compliance](#)
2. Forms
  - [CU Anschutz Student Medical Exemption Form](#)
3. Other Resources (i.e., training, secondary contact information)
  - [CU Anschutz COVID-19 Resources](#)
  - [EEOC What you Should Know About COVID-19 and the ADA, the Rehabilitation Act, and other EEOC laws](#)