



Campus Administrative Policy

Policy Title: COVID-19 Vaccination Requirement and Compliance

Policy Number: 3012

Functional Area: General Administration

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Chancellor, University of Colorado Anschutz Medical Campus

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

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, 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 accessing CU Anschutz facilities and programs in person 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, and receive recommended booster shots for those specific vaccines, subject to limited exceptions and exemptions.¹ Should the WHO approve additional COVID-19 vaccines, they may be approved by CU Anschutz on a case-by-case basis.

Employees and badged affiliates must submit proof of COVID-19 vaccination by September 1, 2021. Students will be required to submit proof of COVID-19 vaccination before the start of the Fall 2021 semester, which varies by program and may occur prior to September 1, 2021. Students who will initially participate in University-related activities remotely will be required to submit proof of COVID-19 vaccination before any in-person component of their curriculum whether on campus or at a clinical site. Individuals who do not provide proof of

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

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, staff, faculty, post-doctoral fellows, medical residents and fellows.
2. The term “badged affiliates” includes, but is not limited to, any individual who has CU Anschutz badges to access campus facilities, including badged contractors and employees at affiliated institutions who have CU Anschutz badges 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 accessing any University facility or program in person must, no later than September 1, 2021, either (i) be fully vaccinated against COVID -19, or (ii) receive an approved exemption as further described below.

1. Vaccine Verification

All Individuals must provide proof of COVID-19 vaccination. Employees, badged affiliates, visitors, and volunteers must submit their proof of COVID-19 vaccination via the approved campus database, which is a campus-wide platform. Students must submit their proof of COVID-19 vaccination to their individual Schools/College/programs in the same manner that they would submit proof of other required vaccinations.

An Individual’s failure to provide proof of vaccination or to submit an exemption pursuant to Section 2 will be required to follow the safety protocols described below that apply to unvaccinated, exempt Individuals.

2. Exemptions

Individuals may be exempted from the CU Anschutz requirement to receive a COVID-19 vaccine for medical or religious reasons.

A medical exemption may be granted if vaccination is medically contraindicated due to other medical conditions or due to a physical condition that would cause vaccination to endanger an individual’s life or health. A Physician (MD, DO), Advanced Practice Nurse (APN), or Physician Assistant 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 religious exemption may be granted based on a person's religious belief whose teachings are opposed to immunizations. Employees, badged affiliates, visitors, and volunteers must submit their religious exemption forms via the approved campus database, which is a campus-wide platform. Students must submit their religious exemption forms to their individual Schools/College/program in the same manner that they would submit exemptions for other required vaccinations.

Individuals who are granted medical or religious exemptions 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 up-to-date Centers for Disease Control ("CDC") guidance, submitting daily attestations, and undergoing frequent asymptomatic testing² at the Individual's own cost and expense.

Unvaccinated employees and unvaccinated badged affiliates who fail to comply with required safety protocols may be referred to their Supervisors for potential action and/or discipline. 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 comply with required safety protocols may be referred to their respective School/College/program for potential action and/or discipline. 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 exemption, may not be allowed to access University facilities or programs in person.

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

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 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.

² 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.

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.

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. Procedures
3. Forms
 - CU Anschutz Employee, Badged Affiliate, Volunteer, and Visitor Medical Exemption Form
 - CU Anschutz Student Medical Exemption Form
 - CU Anschutz Student Religious Exemption Form
4. 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 EEO Law
5. University of Colorado COVID Vaccine Requirement Frequently Asked Questions (FAQs)