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COVID-19 Vaccines: Considerations for Employers

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TOPICS INCLUDE:

- Safety Considerations:
Protection of the public patients and older Americans
Protection of healthcare workers who interact with the public
- Mandatory or only recommended for all employees, or only mandate some? The legal controversy explained.
- How will the EEOC weigh in?
- ADA accommodations?
- Religious accommodations?
- How to administer and who pays?
- CDC recommendations
- Do you need a policy?

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Introduction


On December 11, 2020, the FDA granted Emergency Use Authorization for the Pfizer/BioNTech COVID-19 vaccine candidate. That vaccine, which appears to be more than 90% effective in preventing the virus's spread, will likely soon be joined by other candidates, such as a similarly effective vaccine developed by Moderna.



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Introduction


With their blazing-fast production time and extraordinary efficacy, the COVID-19 vaccines are among our most impressive recent medical achievements. They may also be the most controversial. Despite near-universal healthcare consensus as to the vaccines' safety and efficacy, early polling suggests deep skepticism, with many in the population indicating that, if offered the vaccine, they will refuse. And in a time of endemic disinformation and controversy, this resistance may only deepen.



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Introduction


Given the choice, employers might prefer to stay on the sidelines in an effort to avoid the coming "vaccine wars." Like it or not, however, America's workplaces will be on the front lines and likely will find themselves caught between public health imperatives, liability fears, and a restive workforce. And while current guidance indicates that employers generally can mandate employee vaccination (subject to religious and medical exceptions), unless the Occupational Safety & Health Administration (OSHA) or other authority requires them to do so, employers will face strong and countervailing pressures in deciding whether or how to implement such policies.



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Introduction


Synergy HR offers a "Playbook" here for employers to navigate these choppy waters. Below we set out key considerations, both for employers who want or ultimately may be required to pursue a mandatory vaccination program and for employers who wish to encourage voluntary compliance.



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Introduction

Each employment context, of course, will differ. A mandatory vaccination policy that works well for a close-quarters or contact-heavy workplace, such as a healthcare facility or even a meatpacking plant, might be too heavy handed for a low-contact team of remote computer coders. Likewise, different states, cities, and industries may adopt very different workplace vaccination rules, creating a thicket of regulation (this Alert limits its scope to nationally applicable federal regulation, but state and local rules may differ). Despite this variation, though, there are nevertheless strategies and insights that can offer guidance.




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**Deciding Who Decides:
Should Employers Mandate Vaccination?**


As a threshold question, employers will need to decide whether to require employees to be vaccinated or instead to make vaccination voluntary.

Below are some key considerations in making this choice.



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Why Require the Vaccine?



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Why Require the Vaccine?


Protecting Workplace and Community Health: In the absence of a regulatory requirement, the single most important reason for a workplace vaccine mandate is that it will protect workers' health and lives. Each COVID-19 vaccine authorized for emergency use will have been found by the FDA to be "safe and effective," and that authorization will have been supported by the Vaccines and Related Biological Products Advisory Committee (VRBPAC), an FDA advisory panel of outside scientific and public health experts that has independently reviewed the data. The upshot is that, based on the best evidence available, the vaccines now being rolled out will protect the health and lives of employees, customers, and communities.



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Why Require the Vaccine?


To be sure, vaccinations will not ensure everyone's safety: we do not yet have long-term data on the duration of immunity, even the most effective vaccine candidates will protect no more than 90 to 95% of patients, and bona fide medical or religious reasons mean that some individuals cannot be vaccinated.



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Why Require the Vaccine?


Accordingly, even in the best-case scenario, a significant minority of the population will still be exposed and dependent upon the development of herd immunity to protect them. But these caveats should not distract from this reality: **by an order of magnitude, COVID-19 vaccines will be our most effective medical strategy to prevent transmission of the virus and save lives.**



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Why Require the Vaccine?


Ensuring Vaccines Become Vaccinations: These powerful health benefits, however, will only be realized if workers actually get the vaccine. In other words, as public health experts have noted, we must "turn vaccines into vaccinations." Here, a mandatory approach may be important because voluntary vaccine programs have often had relatively low compliance, even in industries like healthcare, and even for vaccines that have been the subject of massive "persuasion" campaigns (such as for the flu).



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Why Require the Vaccine?


Given the amount of disinformation surrounding the coronavirus in general and vaccines in particular, such opt-in rates may, without a mandate, be even lower here. Put another way, a mandatory vaccine policy likely will be vastly more successful than a voluntary one at ensuring workers actually get protected.



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Why Require the Vaccine?


Reducing Costs of Absences, Lost Productivity, and Long-Run Medical Care: Because a mandatory vaccination program creates a more vaccinated workforce, it also can significantly reduce workplace costs. Vaccinated workers will be less likely to fall ill to COVID-19, impose fewer costs from absences or lost productivity, require fewer instances of acute medical care, and impose lower long-term health costs. This last point is an important one: COVID-19 might be best known for short-term (and often horrific) acute consequences, but its long-term health impacts are poorly understood, yet believed to be significant for some. Therefore, the virus may lead to worker illness and impairment that can span for months or even years. A higher vaccination rate is likely to curb each of these costs.



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Why Require the Vaccine?


Getting and Staying Open: A mandatory vaccination approach also makes it more likely that a business can open and stay open. Even if there are no medical consequences, a single positive COVID-19 test can lead an employer to fully stop operations, particularly in industries like dining and hospitality. A highly vaccinated workplace reduces the likelihood of such stoppages. At the same time, high vaccination rates can accelerate a "return to normal" by making it safer for the workforce to return to the office or otherwise resume normal operations, and by creating a safer environment for customers.



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Why Require the Vaccine?


Defend Against Civil Liability for COVID-19 Cases: Further, and especially as vaccination rates increase, an un- or under-vaccinated workforce may pose a liability risk, as individuals infected on premises look to pin the blame on employers.



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Why Require the Vaccine?


Under tort law principles, employers that fail to take reasonable care to protect employees (or, for that matter, vendors, visitors, customers, or others on premises) risk liability. Applying this concept, individuals who become sick based on alleged on-premises exposure can argue (and in some cases have argued) that a business's negligent safety practices (whether related to personal protective equipment (PPE), vaccines, cleaning, or anything else) caused their illness.



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Why Require the Vaccine?


For employees themselves, such COVID-19 suits are likely to be limited by workers' compensation statutes. Companies are already seeing lawsuits seeking relief from employee injuries ranging from wrongful workplace exposure to COVID-19 to wrongful death from COVID-19. In many cases, damages related to on-the-job COVID-19 exposure (or subsequent illness) will be considered occupational injuries and so are very likely covered under the relevant state's workers' compensation statutes.



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Why Require the Vaccine?


But employees' lawyers will no doubt argue that this bar may not provide full protection, as evidenced by extensive (and so far, unsuccessful) efforts by federal lawmakers to provide businesses with greater immunity from employee COVID-19 claims, as well as by a surge of interest in drafting (potentially unenforceable) employee COVID-19 liability waivers.



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Why Require the Vaccine?


More importantly, workers' compensation statutes do not account for other stakeholders who may claim COVID-19 damages from exposure to an unvaccinated workforce. This includes suits by contractors, vendors, visitors, or customers—particularly in contact-intensive industries like education, lodging, hospitality, healthcare, or fitness where PPE may not provide sufficient protection.



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Why Require the Vaccine?


A mandatory vaccination policy reduces these risks. First, and most obviously, mandatory vaccination makes it less likely individuals get sick in the first place, and therefore less likely anyone suffers legally actionable damages. Separately, the adoption and implementation of a mandatory vaccine plan can itself be important evidence of the high standard of care a company provided for those on premises, which also may be important in beating back potential liability.



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Why Require the Vaccine?


Unless a broad liability shield is enacted by Congress, civil suits for COVID-19 infection damages, whether by employees, contractors, visitors, or customers, will remain a threat for the foreseeable future, and mandatory vaccination could be a key tool to address it.



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Why Require the Vaccine?


Potential Protection Against Enforcement Action: Apart from civil liability from private plaintiffs, businesses without vaccine mandates could confront regulatory risk as well. Under OSHA's "general duty" clause, for instance, employers are required to furnish each employee with a workplace free from recognized hazards that could cause serious harm. While current OSHA guidance suggests this "general duty" can be satisfied by measures like PPE or distancing, in the longer-run the agency might take the position that a robust vaccination program is required and that workplaces without such policies are not safe. This may be particularly true for healthcare and other industries where social distancing or similar measures may not be viable.



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Why Require the Vaccine?

Further, even if OSHA does not enforce the "general duty" clause in this way, private litigants, unions, or others may seize on this language to argue that employers without mandatory vaccination policies are not providing a safe workplace.



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Why Make the Vaccine Optional?



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Why Make the Vaccine Optional?


Employee Morale and Retention: Any "mandate," as opposed to an optional program, would need to be carefully messaged and framed to the workforce. If the purposes behind the requirement are not explained (and even if they are), it may become a source of employee discontent or dissatisfaction. Day-to-day, such a requirement may lead employees opposed to the vaccine to view the company more negatively, and to respond accordingly.



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Why Make the Vaccine Optional?


Even with excellent messaging and buy-in, it is likely that some portion of the workforce, out of "anti-vaccine" belief, political views, or other reasons, will refuse to get the vaccine, and at the extreme may choose separation of employment rather than being vaccinated. And laws like the National Labor Relations Act (NLRA) could arguably protect various forms of employee protest as to the requirement, such as through social media campaigns.



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Why Make the Vaccine Optional?


Administrative Ease: Even for "mandatory" vaccines, by law those with medical conditions or sincerely held religious beliefs that preclude vaccination are entitled to make exemption requests and to seek appropriate reasonable accommodation (both possibilities discussed in detail below). Given the controversy around the vaccine, many workers may try to claim such exemptions. Without thoughtful processes, this could put Human Resources (HR) at risk of being overwhelmed by needing to decide, on a case-by-case basis, who qualifies for an exemption. In a voluntary program, by contrast, no (or much less) formal process is needed.



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Why Make the Vaccine Optional?


Less Liability Risk for Discrimination Claims: On this point, individuals who seek an exemption but are denied may pursue legal claims, such as on the grounds that they were unlawfully discriminated against under the Americans with Disabilities Act (ADA) based on a medical condition their employer did not treat with sufficient seriousness, or under Title VII of the Civil Rights Act for their religious beliefs. Careful applications of the exemption process will minimize this risk, but cannot eliminate it.



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Why Make the Vaccine Optional?

Potentially Less Necessary to Certain Industries: Finally, while in some industries, like healthcare or personal services, close contact is unavoidable, in others, it is less of a concern. For workplaces that do not require close contact, and so can more effectively avoid or mitigate the potential spread of the virus on-site, a vaccine mandate might be unnecessary.



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Playbook for Employer Vaccine Policies



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Playbook for Employer Vaccine Policies

As the above shows, employers may have sound safety, business, and legal reasons to pick either a mandatory or a voluntary approach to a COVID-19 vaccine. But without attention to risk points, either approach can run into trouble. Here are ways to minimize the danger, no matter which approach employers take.




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Assess the Right to Require Vaccinations

A. Assess the Right to Require Vaccinations


An employer's first step is to confirm its right to require vaccinations. For obvious reasons, this is important to workplaces that want to mandate vaccines. But even workplaces that want to pursue voluntary vaccination policies may want to confirm this information, both because conditions may change over time, and also because, even if employers do not make vaccination a condition of employment, they may want to make it a condition for certain employment activities.



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Assess the Right to Require Vaccinations


For most private-sector U.S. employers, current law suggests vaccinations can likely be required as a condition of employment for at-will employees. In the context of the H1N1 flu, for example, OSHA guidance indicates that, so long as a private employer makes appropriate religious and medical exceptions, an employer may require vaccination as a condition of employment. Historically such guidance was directed toward medical care facilities.



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Assess the Right to Require Vaccinations


That said, a given workplace may be subject to special conditions, so it is important to assess, at the outset, whether a vaccination requirement would be permissible. One example is if a collective bargaining agreement (CBA) governs the terms of employment, in which case it may speak to vaccine requirements. Further, if employees are not at-will, but rather work under a contract, that contract may dictate whether a vaccine can be required.



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Assess the Right to Require Vaccinations

Likewise, while to date no state or local law or regulation appears to impose any general bar to private employers requiring vaccination, the situation at the federal, state, and local level is evolving rapidly, so employers should obtain legal advice and ensure no new rule (or relevant agency guidance or court decision) has changed the landscape before getting started.




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Plan to Process Exemption Requests

B. Make a Plan to Process Exemption Requests

Even if employers choose to "mandate" a vaccine, they must still be prepared to provide legally required exceptions for employees who (1) cannot take the vaccine due to a medical disability or (2) seek an exemption from the vaccine based on sincerely held religious beliefs. Virtually all employers must comply with these important legal protections. But employers should also recognize that they can structure such requests, and the resulting accommodations, in a way that satisfies the law while ensuring that those who are not truly motivated by such concerns, but instead merely would prefer to be unvaccinated, do not take advantage of them.




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Plan to Process Exemption Requests

1. Medical Exemptions

For medical reasons, some individuals may be unable to safely take the vaccine. We know, for example, that the vaccine should not be administered to individuals with a known history of a severe allergic reaction to any component of the vaccine. Under the ADA, if an employee claims to require an exemption based on a "disability," a workplace must engage in an "interactive process" with that individual to arrive, if possible, at a "reasonable accommodation" (which, potentially, would relieve the employee from having to get the vaccine).




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Plan to Process Exemption Requests

Employee requests for medical exemptions should be treated like any other ADA request for accommodation. However, if employers are concerned that vaccine qualms will lead to insincere accommodation requests, there are steps they can take.


First, the ADA permits requests for reasonable documentation of the disability, which an employer can enforce.



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Plan to Process Exemption Requests


Second, workers with disabilities do not have the right to the accommodation of their choice, but rather to a "reasonable accommodation," one that "reasonably" accommodates their disability, and that does not impose an "undue hardship" on an employer.



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Plan to Process Exemption Requests


For example, employees who cannot be vaccinated do not necessarily need to be offered the "accommodation" of simply not receiving the vaccine but then otherwise resuming work as normal, nor must they be offered the accommodation of continuing to work from home after their colleagues have returned to work. Rather, under appropriate circumstances, an employer might instead require unvaccinated employees to attend work, but continue to distance and wear masks and PPE, even after vaccinated employees may in the future be permitted to halt such measures.



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Plan to Process Exemption Requests


Other possible accommodations may include shifting unvaccinated workers to other workplace roles or positions, relocating work sites within a building, or requiring that employees work remotely even if they want to return. This process will typically require a case-by-case assessment of the relevant facts.



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Plan to Process Exemption Requests

In sum, employers should recognize that the ADA does not create an automatic right for anyone to "opt-out" of the vaccine, but only a right to a fair interactive process that leads to a reasonable accommodation.




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Plan to Process Exemption Requests

2. Religious Exemptions


The second major category for possible exemptions are accommodation requests based on sincerely held religious beliefs or religion-like philosophical systems. Under Title VII, such beliefs must be taken into account, and if it would not pose "undue hardship," a reasonable accommodation must be granted.



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Plan to Process Exemption Requests


Compared to medical exemption requests, Title VII religious accommodation requests are (1) easier to establish, with employees permitted to substantiate the "sincerity" of their beliefs with little documentation; but (2) less demanding on employers, in that the accommodations granted need only be provided if they would impose "de minimis" burdens on the employer. Both of these distinctions are relevant to any COVID-19 vaccination mandate.



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Plan to Process Exemption Requests


On the "sincerity" of the religious belief at issue, the EEOC has noted that an employer is entitled to "make a limited inquiry into the facts and circumstances of the employee's claim that the belief or practice at issue is religious and sincerely held, and gives rise to the need for the accommodation." That said, an employee can provide sufficient proof of sincerity by a wide variety of means, including "written materials or the employee's own first-hand explanation," or verification of "others who are aware of the employee's religious practice or belief."



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Plan to Process Exemption Requests


Beyond that, probing the "sincerity" of a religious belief is risky business. So to the extent employees provide such substantiation, and even if their interpretation of a religious tenet differs from that religion's mainstream, employers would be wise, at that point, to accept it.



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Plan to Process Exemption Requests


However, the EEOC has further made clear that employers are only obligated to accommodate "religious" beliefs or comprehensive religious-type philosophical systems, as opposed to other strongly held types of beliefs. For instance, there is no legal requirement to accommodate political, scientific, or medical views, or isolated ideas (such as "vaccines are dangerous").



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Plan to Process Exemption Requests


Given these principles, workplaces with vaccine mandates may want to create standardized Title VII exemption-request forms that (1) expressly state and remind employees that political, social, scientific, or other non-religious views are not sufficient justification and that it is not appropriate to request a Title VII exemption on those grounds, but that (2) otherwise permit employees to explain, in their own words, their religious or religious-type beliefs and why those beliefs prevent vaccination. As noted, however, to the extent an employee then completes the form and provides such an explanation, the explanation generally should be credited.



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Plan to Process Exemption Requests


However, for the accommodation itself, as in the ADA context, even a sincere religious exception does not guarantee the right to be accommodated, but only the right to a process that may, if legally required, lead to an accommodation. And unlike the medical context, where the "undue hardship" an employer must show to deny accommodation is a "significant difficulty or expense," in the Title VII context "undue burden" is defined to require only a showing of more than a "de minimis" cost on the business.



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Plan to Process Exemption Requests

Accordingly, in addition to requiring unvaccinated employees to keep using PPE and other measures even after the rest of the workforce returns to normal, an employer likely has much more latitude to indicate that, where the risk of non-vaccination imposes burdens on the company, non-vaccination will not be allowed.




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Build Buy-In and Plan for Conflict Diffusion

C. Build Buy-In and Plan for Conflict Diffusion

Even with the legal authority to impose a mandate, employers that go this route still must be sure to build employee buy-in for compliance. This is particularly important in light of concerns regarding how a vaccine requirement might impact employee morale or office culture.




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Build Buy-In and Plan for Conflict Diffusion

The more a workforce understands why the employer chose a mandate, and the more they have the chance to feel "heard" on the subject, the less friction there will be (and the fewer workers will attempt to claim potentially unneeded exemptions). Best practices for building buy-in include:


- Informing employees of the policy change in advance, so that they can meaningfully share their views.



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Build Buy-In and Plan for Conflict Diffusion


- Clear communication as to the purpose of the requirement: employee safety and allowing a return to normal.
- Tying the vaccine mandate to concrete and visible changes (e.g., once the vaccine is in place, re-open formerly closed off recreation areas or office space).
- Providing accurate and reader-friendly information on the vaccine. Given the amount of mis- or disinformation available, employers and HR in particular will play a key educational role.



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Build Buy-In and Plan for Conflict Diffusion

On this point, given the incendiary rhetoric around vaccines and strong beliefs held by individuals on many topics related to vaccination, it is possible that the accommodation process, if not carefully handled, could lead to workplace tension. Workplaces should be aware of this risk and ensure that at no time does it rise to the level of impermissible discrimination or a hostile workplace.




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Minimize (and if Possible, Eliminate) Vaccination Costs to Employees

D. Minimize (and if Possible, Eliminate) Vaccination Costs to Employees


As a further way to ensure buy-in, whether for a mandatory or a voluntary program, employers should consider as many steps as possible to reduce the cost to employees of getting the vaccine. The medicine itself will be provided, free of charge, by the federal government. But unless already covered by employee insurance, employees may still be charged an "administrative fee." Employers should consider covering those or other incidental costs, even if otherwise "out of plan" for workers.



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Minimize (and if Possible, Eliminate) Vaccination Costs to Employees


Another "cost" to employees is that of time—such as the time to travel off-site to get a vaccine. Contracting with a third-party provider to conduct on-site vaccination can help reduce this cost and may provide further liability protection.



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Minimize (and if Possible, Eliminate) Vaccination Costs to Employees


Finally, for the small minority of workers who experience symptoms or bad reactions to the vaccine, employers should consider adopting a permissive approach to allowing (or extending further) paid sick leave to the extent necessary, even if a worker might otherwise not be entitled to it.



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Minimize (and if Possible, Eliminate) Vaccination Costs to Employees

As shown above, such measures, while they may not be legally required in certain circumstances (depending on wage-hour and sick leave laws, among other things), are likely to be critical to increase and encourage buy-in.




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Take a Thoughtful Approach to Continued PPE and Distancing Requirements

E. Take a Thoughtful Approach to Continued PPE and Distancing Requirements


One common question will be whether a vaccination policy can or should supplant mask requirements, distancing, and other measures. Because the vaccines are not one-hundred percent effective, and because it is unknown if vaccinated individuals can still spread the virus, there is no guarantee that even a vaccinated employee will be fully protected. Further, employers should also be mindful of the safety of individuals who, for medical or religious reasons, are unable to be vaccinated.



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Take a Thoughtful Approach to Continued PPE and Distancing Requirements


Finally, even the most optimistic projections indicate that, for at least some period of time, there will not be enough vaccines to cover everyone in the workforce. Each of these considerations suggests that, at least in the short term, policies like masks and social distancing may still be needed.



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Take a Thoughtful Approach to Continued PPE and Distancing Requirements

In the long run, however, providing the prospect of a return to relative normal for those who are vaccinated could be a powerful force toward boosting morale and commitment to a vaccination program, and toward getting greater employee buy-in.




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Be Aware of Labor Law Issues

F. Be Aware of Labor Law Issues


One further area to be aware of in rolling out a vaccine policy is the possibility of concerted labor action. Section 7 of the NLRA protects certain "concerted activity" regarding working conditions, which might extend to protests or other labor action regarding a vaccine policy. Crucially, however, the NLRA does not protect non-compliance with workplace safety rules (such as employees attempting to style refusal to be vaccinated as a legally protected labor protest).



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Be Aware of Labor Law Issues

Further, to the extent there is a risk of labor activity against a vaccine mandate, employers should be aware that there is a countervailing risk of labor activity for a mandate, such as strikes by employees who refuse to come to work until their colleagues have been vaccinated.




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Don't Lean Too Hard (or Perhaps at All) on Waivers

G. Don't Lean Too Hard (or Perhaps at All) on Waivers


Finally, for those employees who, whether by choice or a valid exemption, are not vaccinated, some employers are considering requiring a waiver indicating that the employee understands the medical risks of this decision and accepts any associated risk. Given the limitations on the enforceability and permissibility of such waivers, however, a robust disclosure may be a better format. OSHA, for instance, has long required an attestation for employees in the context of bloodborne pathogen vaccines acknowledging their understanding of the risks should they not be vaccinated. Seeing the risks of declining the vaccine clearly laid out in writing may, at the margin, increase buy-in.



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Don't Lean Too Hard (or Perhaps at All) on Waivers


That said, as a liability protection device, there is reason to be skeptical about such disclosures or waivers. In many jurisdictions, courts will find that employee liability waivers for workplace illnesses and injuries are not enforceable or even permissible, given the perceived imbalance of bargaining power or the operation of state workers' compensation laws (which in some cases are read to preclude such waivers). Accordingly, while it may make sense to provide certain disclosures to unvaccinated employees, an actual waiver of liability may be prohibited or unenforceable.



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Conclusion

Employers should think through the particulars of how and why a vaccine might be required in the workplace. Many employers are considering ways to encourage the vaccine rather than mandating it, but even incentive plans can be tricky and must be handled in a nondiscriminatory manner that complies with applicable laws. For example, an incentive offered through a wellness program may require employers to consider alternatives for those who are medically unable to take the vaccine.




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Conclusion

Dr. Welela Tereffe, chief medical executive at MD Anderson, said keys to successfully executing her hospital's vaccination program include:


- Consistently distributing "factual, trustworthy information" to employees about COVID-19 vaccinations.
- Clearly communicating ethical, transparent guidelines about how vaccinations will be administered, based on recommendations from state and federal health authorities.
- Enabling employees to self-schedule vaccination appointments.



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Conclusion


Our main goal is to ensure that we're providing information in the language people understand best in a format that works best for them, with support for questions that they have, and that we're giving them equitable access to the vaccine," Tereffe said. "Over time, we'll assess how that process is working before we consider setting any sort of requirements or targets for vaccination.



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Conclusion

As noted at the outset, no one size fits all, especially given the different levels of risk of infection spread in different industries and workplaces, as well as the fast-evolving legislative and regulatory environment around COVID-19.




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CDC Frequently Asked Questions

CDC is working with partners at all levels, including healthcare associations, on flexible COVID-19 vaccination programs that can accommodate different vaccines and scenarios.


Here is a link to CDC answers to commonly asked questions: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/faq.html>



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Sample COVID Vaccine Policies

Handouts attached to this webinar will contain two COVID Vaccine Policies – one Mandatory and one Voluntary.



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