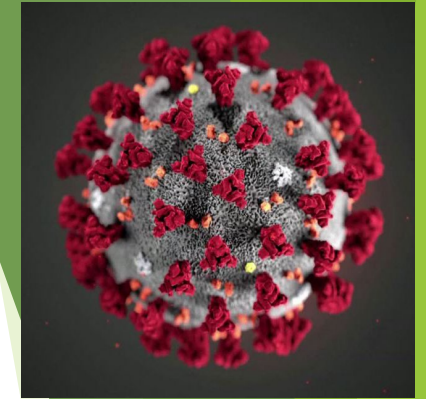


Federal Rules & Iowa Laws About COVID-19 Vaccines, Testing, & Masking



Presenters

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Disclaimer

- The material presented is designed and intended for general informational purposes only.
- It is not intended and it should not be construed or relied upon as legal advice.
- These materials are current up to approximately 5 days before presentation. For more recent developments, specific information, application to particular factual situations, or the effect of a particular law, the opinion of qualified legal counsel engaged by you should be sought.
- Consult with your own legal counsel before taking action or making changes.

Agenda

1. Federal Laws re: COVID-19 Vaccines, Testing, & Masking
 - a. Current status of litigation on 3 newest rules
 - b. Details on OSHA ETS
 - i. Surveys of employees and employers regarding vaccine, testing, and masking laws
 - ii. Iowa OSHA and the OSHA ETS
 - c. NLRB re: bargaining over COVID-19 policies/rules
2. Iowa laws re: COVID-19 Vaccines, Testing, & Masking
3. COVID-19 Test How-Tos

3 Newest COVID-19 Vaccine Federal Rules for Employers

1. E.O. 14042 for Federal Government Contractors and Subcontractors (rules issued 9.24.2021 & 9.30.21)
2. Centers for Medicare & Medicaid Services 11.5.2021 Rule for 15 Types of Healthcare Facilities/Providers
3. OSHA 11.5.2021 Emergency Temporary Standard for Employers with 100 or More Employees on that Date

E.O. 14042 for Federal Gov't Contractors and Subcontractors

E.O. 14042 - Federal Contractors & Subs

- ▶ 9.9.2021 E.O. 14042 Issued for Federal Ks and SubKs
- ▶ 9.24.2021 Safer Federal Workforce Task Force issued Guidance
- ▶ 9.30.2021 Federal Acquisition Regulatory Council issued Guidance (Individual Agencies are issuing guidance that aligns with TF and FARC)
- ▶ 1.4.2022 Deadline to be Fully Vaccinated (coordinated with OSHA and CMS rules by a Presidential Fact Sheet issued 11.4.2021)

Financial Institutions should read this blog to determine whether they are covered: <https://www.dickinsonlaw.com/blogs-articles/2021/09/27/mandated-vaccination-under-executive-order-14042-are-depository-institutions-covered>

E.O. 14042 - Federal Contractors & Subs

**SAFER
FEDERAL
WORKFORCE**

- ▶ 11.30.2021 Injunction issued by E.D. Ky. Judge
 - Applies to **ERs and state gov'ts in 3 states**: KY, TN, OH
- ▶ 12.7.2021 Injunction issued by S.D. Ga. Judge
 - Applies **Nationwide**
 - Appealed by Gov't on 12.10.2021
 - 11th Circuit refused to stay the nationwide injunction on 12/20/21
- ▶ 12.16.2021 Injunction issued by W.D. La. Judge
 - Applies to **3 States' gov'ts**: LA, MS, IN
 - Does *not* apply to private ERs in those states because only the State Gov'ts filed the lawsuit
- ▶ 12.20.2021 Injunction issued by E.D. Mo. Judge
 - Applies to **10 states**: AR, AL, IA, MO, MT, NE, NH, ND, SC, WY



WTW ER Survey



53% of Federal Contractors/Subcontractors surveyed will apply vaccine mandate rules to all workers at all locations





CMS Rule for Healthcare Facilities



Centers for Medicare & Medicaid Svcs



- ▶ 5.11.2021 Rule for LTC Facilities

- ▶ 11.5.2021 Rule for 15 Types of Healthcare Facilities that are Recipients of Medicare and Medicaid
 - 1.4.2022 Deadline to be Fully Vaccinated
 - Coordinated w/ OSHA & Federal Contractor rules by a Presidential Fact Sheet issued 11.4.2021



Centers for Medicare & Medicaid Svcs



- ▶ State of FL Lawsuit
 - 11.20.2021 N.D. Fla. Judge Refused to Enjoin the Rule
 - 11.23.2021 11th Cir. Denied FL's Appeal (2-1; 94-page opinion)
- ▶ 11.29.2021 CMS Rule Enjoined by E.D. Mo. Judge
 - Applies to **10 states**: IA, AK, AR, KS, MO, NE, NH, ND, SD, WY
 - Gov't appealed to 8th Cir.
- ▶ 11.30.2021 CMS Rule Enjoined by W.D. La. Judge
 - Nationwide coverage
 - Gov't appealed to 5th Cir.
 - ✓ 12.16.2021 5th Circuit narrowed Injunction to **14 states** involved in the lawsuit: AZ, AL, GA, ID, IN, KY, LA, MS, MT, OH, OK, SC, UT, WV
- ▶ 12.16.2021 Gov't filed 2 Motions w/ **SCOTUS** Seeking to Stay these two Injunctions pending the outcome of its appeals to the 5th & 8th Circuits. Briefing is due 12.30.21.





OSHA ETS for ERs with 100+ EEs



OSHA 100-EE ETS and Other Federal Vaccine Mandates

**OSHA 100-EE ETS DOES NOT APPLY TO EES
ALREADY COVERED BY A DIFFERENT FEDERAL
VACCINE MANDATE, PARTICULARLY IF THE OTHER
MANDATE HAS STRICTER COMPLIANCE
REQUIREMENTS**



OSHA Emergency Temporary Stds

- ▶ Released at least 4 general COVID “guidances” in 2021
- ▶ Issued 1 COVID ETS for Healthcare on 6.21.2021
 - Expired on 12.21.21 w/o movement for a permanent std
 - These ERs now covered by OSHA 100-EE ETS (if large enough)
- ▶ Issued 1 COVID ETS for ERs with 100 or More EEs on 11.5.2021

Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees

Each employer shall comply with occupational safety and health standards promulgated under this Act



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OSHA 100-EE ETS - State Plan Obligations

- ▶ Adopt and enforce std at is “at least as effective” w/in 30 days
 - State Std can be stricter
 - Unlikely IA will adopt a stricter std
- ▶ Notify federal OSHA w/in 15 days of the action it will take
- ▶ State Std must be in effect for the duration of the ETS
- ▶ State and local gov’t EEs are covered in States w/ State Plans



OSHA 100-EE ETS - Litigation



► Challenges

- State/ER/ER Group Challenges began 11.5.2021 in conservative courts
- Union Challenges began 11.10.2021 in liberal courts
- Eventually, lawsuits were filed in all 12 Circuit courts

► Stay

- 5th Circuit - Stay issued Sat, 11.6.2021
- 5th Circuit - Extended Stay on 11.12.2021 until hearing on Preliminary Injunction

► OSHA suspended implementation and enforcement



OSHA 100-EE ETS - MultiCircuit Litigation



- ▶ More than 20 cases filed in all 12 Circuits were consolidated under MultiCircuit Litigation rules, per Govt's request

- ▶ All cases transferred and consolidated in 6th Circuit because it 'won' the MCL lottery on 11.16.2021
 - 16 active judges
 - ✓ 6 appointed by D Presidents
 - ✓ 10 appointed by R Presidents
 - 12 senior status judges
 - ✓ 3 appointed by D Presidents
 - ✓ 9 appointed by R Presidents



OSHA 100-EE ETS - MultiCircuit Litigation



▶ Gov't request for Expedited Schedule = DENIED 12.3.2021

▶ Buckeye Institute M. for *en banc* = DENIED 12.15.2021

▶ **Gov't M. to Lift 5th Circuit's Stay = GRANTED 12.17.2021**

- At least 8 emergency applications to replace the stay have been filed with SCOTUS (shadow docket)
 - Goes to Justice assigned to 6th Cir (Justice Kavanaugh); who can kick to full court
 - Briefing due on 12.30.21
- ▶ OSHA Enforcement Discretion Notice on 12.18.2021 (Sat)
- 1.10.2022 = Begin enforcement of all provisions of ETS (exc. testing)
 - 2.9.2022 = Begin enforcement of ETS Testing requirement
 - ERs won't be cited if they exercised “reasonable, good faith efforts” to comply with the ETS by these new deadlines
- Reminder: IA has not adopted the ETS yet, so IA has no compliance dates
 - OSHA did not say whether state plan states can adopt later enforcement dates
- ▶ Plaintiffs Filed Emergency Appeal with SCOTUS



What if Vaccine Rules Are Struck Down?

75% of ERS will not implement Vaccine or Testing Policies

OSHA 100-EE ETS - Congressional Action



- ▶ Congressional Review Act Resolutions
- ▶ Introduced 11.17.2021
- ▶ Chanced of success are very low



OSHA 100-EE ETS - Key Dates



11.5.2021 = Date to take the EE count to determine coverage

~~12.6.2021~~ 1.10.2022 = Compliance deadline for most provisions

~~1.4.2021~~ 2.9.2022 = Compliance deadline to implement testing



OSHA 100-EE ETS - 11.5.2021



11.5.2021 = Date to take the EE count to determine coverage



OSHA 100-EE ETS - 1-10-2022



- ▶ Many things must be done by ~~12.6.2021~~ 1.10.2022
 - Vaccination status determined with recordkeeping compliance
 - Written policy established and implemented (2 templates)
 - Require EE notice of positive COVID-19 test or diagnosis; removal from work policies activated; clear RTW criteria given
 - Unvaxed must wear face coverings indoors & in vehicles w/ others
 - Paid Leave applies for Vax and Recovery from Vax Side Effects
 - Info req'd to be given to EEs in language they understand



OSHA 100-EE ETS - 2.9.2022



- ▶ Original deadline of ~~1.4.2022~~ for testing was extended to **2.9.2022** by DOL on 12.18.2021, after the stay was lifted
- ▶ Testing Requirements Begin
 - EEs not vaxed must test negative weekly - including those with approved exceptions:
 1. RA given due to disability or religion
 2. Medical necessity requires delayed vax
 3. Vax is medically contraindicated
 - EEs who miss work for 1 week or longer due to COVID-19 positive test or diagnosis must get a negative test w/in 7 days before RTW - applies to vaxed and unvaxed
 - Do not have to test EEs who have had all vax shots, but not fulfilled the 2 week waiting period by ~~1.4.2022~~ **2.9.2022**
- ▶ Natural immunity/Antibodies ≠ Fully Vaccinated



OSHA 100-EE ETS - Count for Coverage



► Who to Include in the Count

- All US EEs, company-wide, regardless of location or indoor/outdoor work
- All US EEs, regardless of vax status or age (minors count)
- FT, PT, OC, Temporary, and Seasonal
- Remote workers

► Who to Exclude from the Count

- Independent contractors
- Temp Service Agency EEs (counted by Temp agency)

► When to Count

- If 100+ on 11.5.2021, ETS applies for its duration—even if fall below 100
- If reaches 100+ at any point during ETS' duration, coverage begins and continues to end of ETS



OSHA 100-EE ETS -Recordkeeping



- ▶ Roster of all EEs and Vax status with a **copy of the proof of vax**
 - *If vax status and proof of such was collected before 11.5.2021, do not have to comply with rules about acceptable docs to collect*
- ▶ Attestation for lost proof of vax is acceptable
 - Vax Status (fully or partially vaxed)
 - Stmt of loss or inability to produce proof of vax status
 - Type of Vax rec'd, as remembered
 - Dates of Vax, as remembered
 - Who administered, as remembered
 - I declare (or certify, verify, or state) that this statement about my vaccination status is true and accurate. I understand that knowingly providing false information regarding my vaccination status on this form may subject me to criminal penalties.
 - Signed and dated by EE
- ▶ Booster status not req'd or relevant (at this time!)
- ▶ Testing results must be preserved/retained for the duration of the ETS (not subject to OSHA's usual recordkeeping requirements)
- ▶ Confidential Medical Records



OSHA 100-EE ETS - Policy Options



▶ Vaccine Mandate

- Testing/Masking is required of those with Exceptions
- New Hires fully vaxed “as soon as practicable”

▶ Testing & Masking

- Exempt from Testing/Masking if Prove Fully Vaccinated
- Must consider RA for those with disability or religious conflicts with masking or testing

▶ Hybrid

- Vaccine Mandate for public/customer-facing EEs
- Testing & Masking Mandate for others



OSHA 100-EE ETS - Covered EEs

Exceptions to Vaccination or Testing/Masking Requirements

- ▶ EEs who do not report to a workplace where coworkers or customers are present
- ▶ EEs who work from home
- ▶ EEs who work exclusively outdoors



OSHA 100-EE ETS - Collective Bargaining

- ▶ 11.10.2021 OM Memo 22-03
- ▶ Private sector ERs do not have to bargain where a change in terms and conditions is statutorily mandated
- ▶ However....
 - Aspects of the ETS where ERs can make choices and have discretion are subject to bargaining (e.g., which policy to adopt, how much time to give for recovery from vax side effects)
 - Also, ERs are obligated to bargain about the effects of elements of the ETS where ERs do not have discretion (e.g., how to handle EEs who refuse to comply with the policy)



WTW ER Survey

18% currently require vaccines

32% will require vaccines if OSHA ETS takes effect

7% plan to require vaccines no matter the OSHA ETS status

57% of ERs require or will likely require vaccine



Qualtrics EE Survey

qualtrics^{XM}

59% of all EEs support ER vaccine mandates (@ ERs of all sizes)

42% of all EEs want ER to enforce federal vaccine mandates

39% of all EEs do *not* want ER to enforce federal vaccine mandates



WTW ER Survey

33% have EE vax rate of 75%+

19% have EE vax rate under 50%



WTW ER Survey

31% are very concerned a vaccine mandate could result in EE exits

But only 3% w/ current vaccine mandates saw EE resignations spike

48% believe a vaccine mandate could help recruiting



Qualtrics EE Survey

75% of unvaxed EEs *considering* quitting if a vaccine mandate goes into effect

22% would seek work at smaller companies

13% would retire or take a break from work

40% of all EEs *considering* quitting if a vaccine mandate is *not* in place

qualtrics^{XM}



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Qualtrics EE Survey

qualtrics^{XM}

28% of unvaxed EEs would *consider* lying about vax status or fabricating docs to keep jobs

55% of all EEs would consider reporting co-EEs who are not vaxed



WTW ER Survey

84% will require test-and-mask for EEs returning to workplace, in addition to vaccine

90% will require masking when working indoors



OSHA 100-EE ETS - Paid Time Off



► Vaccination

- If vaxed during scheduled time, gets up to 4 hrs of time, charged to paid sick leave for each dose of vax (incl travel)
- Special pd leave; cannot use existing pd lv
- If Vax occurs off scheduled work time, no pd leave is available

► Recovery from Vax Side Effects

- “Reasonable time” off to recover
 - Can set a reasonable cap on this
 - 2 days will be presumed reasonable
- Use existing pd sick leave or PTO that combines sick and vacation leaves
 - Cannot use separate vacation or other leave banks
 - Cannot require EE to go negative or borrow against future sick leave/PTO—but still must pay for that time off (special leave)



Qualtrics EE Survey

37% of all EEs say nothing would convince them to get the vaccine

3% of all EEs would be motivated to get the vaccine to avoid a monetary fine

qualtrics^{XM}



DICKINSONLAW

WTW ER Survey

75% are not offering any financial incentives for vaccination

11% are offering some financial incentive for vaccination

14% have stopped or are stopping financial incentives for vaccination

2% are either charging unvaxed EEs a healthcare premium surcharge or giving vaxed EEs a healthcare premium discount



OSHA 100-EE ETS - Testing



► Test Types, Admin, & Frequency for Unvaxed

- FDA appv'd or authorized COVID-19 diagnostic viral tests - NOT antibody tests
- Cannot be self-administered AND self-read unless observed by ER or authorized telehealth
- At least once every 7 days if reports to workplace or works with customers once every 7 days OR within 7 days of reporting to workplace or working with customers (e.g., remote and occasional workers)
- Must keep records of testing for duration of ETS

► Test Costs

- Cost of test can be all on EE, unless other laws require otherwise (e.g., FLSA)
- DOL/WHd will be providing further guidance

► Testing After COVID-19 Positive or Diagnosis

- No testing for 90 days following date of positive test or diagnosis (due to test inaccuracies)
- Face covering still req'd

► Ending Weekly Testing

- End of ETS
- Become "fully vaccinated"



WTW ER Survey



80% will offer/require testing on a weekly basis

47% unsure or have not decided on type of testing



WTW ER Survey



40% are unsure or have not decided who should pay for testing

25% will require EEs to pay for testing, unless prohibited by state law



COVID-19 Testing and Insurance Coverage

- ▶ 12.2.2021 Pres. Biden issued 9-point Action Plan
- ▶ Called on agencies to issue Rules by 1.15.2022 requiring insurance coverage or reimbursement of
 - ▶ 100% of Cost of OTC At-Home Rapid Test,
 - ▶ During the Public Health Emergency,
 - ▶ With no participant cost-sharing.
 - ▶ No retroactivity expected on these rules
- ▶ Currently, insurance is only *required* to pay 100% of cost of tests that are ordered by HCP
- ▶ Open Questions
 - Can health plans limit the number, frequency, and cap costs of tests before requirement participant cost-sharing?
 - Will tests be covered up-front at POS or must reimbursement be sought?
 - Do at-home tests need to be proctored to be eligible for coverage?



OSHA 100-EE ETS - Face Coverings

Face Covering Requirements for all Unvaxed EEs

- Completely covers nose & mouth
- 2 or more layers of tightly-woven, breathable fabric
- Secured to head with ties, ear loops, or elastic bands behind the head
- Gaiters must have 2 layers of fabric or be folded for 2 layers
- Fit snugly over nose, mouth & chin w/ no large gaps at cheeks
- Solid piece of material w/o slits, valves, visible holes, punctures
- Can have clear plastic panel to facilitate communication
- Can be a facemask (FDA cleared or authorized for medical procedures)
- Must be replaced with wet, soiled, or damaged
- If respirators (N-95 or other) are used, must comply w/ OSHA & Mfg Std - ER must allow respirator use
- Face shields allowable to prevent face coverings from getting wet or soiled

ER must ensure these rules are followed



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OSHA 100-EE ETS - Face Coverings

- ▶ ER not *required* to pay for face coverings (unless by other laws of CBA)
- ▶ Must allow all EEs & customers to voluntarily wear face coverings (unless a safety hazard) and can require it
- ▶ When Face Coverings are NOT req'd for Unvaxed EEs
 - Alone in room with floor to ceiling walls and closed door
 - Ltd time while eating, drinking, being identified
 - While wearing a facemask (e.g., N-95) or respirator
 - Face covering is infeasible or creates a greater hazard - ER must prove this was the case



Reasonable Accommodation Requests

- ▶ Valid Reasons for RA Requests
 - Disability
 - Religion
 - Pregnancy
- ▶ Requests for RA from COVID-19 Laws/Policies
 - Request for RA from Vaccine
 - Request for RA from Testing
 - Request for RA from Masking
- ▶ RAs granted should include more than mere “exemption” from the Rule



Reasonable Accommodation Request Forms

► DMT&H forms

1. Request for RA from Vaccine Requirement due to Medical Reasons
2. Request for RA from Vaccine Requirement due to Religious Conflicts
3. Request for RA from Testing and/or Masking due to Medical Reasons
4. Request for RA from Testing and/or Masking due to Religious Conflicts

► Cost

- \$25 for DMT&H Clients
- \$40 for non-clients

► Updates/revisions to all 4 forms are provided without additional charge through 10/15/2022

► Email Claire Warner at cwarner@dickinsonlaw.com



OSHA 100-EE ETS - EEs With COVID-19

- ▶ EEs must *promptly* report to ER (vaxed and unvaxed)
 - Positive COVID-19 Test
 - Diagnosis of COVID-19
- ▶ ER's Must Remove EE from Workplace Immediately
- ▶ EE can work if WFH is available
- ▶ ER not required to provide paid leave, unless req'd by other laws or CBAs
- ▶ RTW (any of these)
 1. Negative test on a confirmatory COVID-19 NAAT test after a positive COVID-19 antigen test
 2. When CDC Isolation Guidance criteria are met
 3. When recommended by HCP



OSHA 100-EE ETS - ER Communications to EEs



- ▶ Requirements of the OSHA 100-EE ETS
- ▶ Copy of Policies/Procedures implementing it
- ▶ COVID-19 Vax info: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/keythingstoknow.html>
- ▶ Retaliation protection for reporting suspected ETS violations or exercising rights under ETS
- ▶ Info on process for determining vax status
- ▶ Pay and leave for vax and side effects
- ▶ Process for Notifying of COVID-19 positive test or diagnosis
- ▶ Process for requesting COVID-19 records
- ▶ Testing and Face Covering Info (to Unvaxed only)
- ▶ OSHA penalties (criminal) for supplying knowingly false stmts



OSHA 100-EE ETS - Non-Compliance Options



- ▶ Consider options with HR Team and LEL Attorney
 - Leave
 - Discipline
 - Lay Off
 - Discharge



OSHA 100-EE ETS - EE Records Requests



► What can be Requested

- EE's own COVID-19 vax documentation and COVID-19 testing results - How will you keep an EE's info separate from others?
- Aggregate # of fully vaxed EEs at a workplace
- Total # of EEs at a workplace

► Who can Request:

- EE
- Anyone with EE's written consent and authorization

► How available: For examination and copying

► When: By end of the next business day after the request was made



OSHA 100-EE ETS - OSHA Records Requests

- ▶ Within 4 business hrs of a Request from OSHA
 - Written Policy
 - Aggregate # of Fully Vaxed EEs at a workplace
 - Total # of EEs at a workplace
- ▶ By the end of the next business day after a request from OSHA
 - All other records required by OSHA 100-EE ETS



OSHA 100-EE ETS - ER Reporting to OSHA



- ▶ EE Fatality from COVID-19 that was Work-Related
 - Confirmed case of COVID-19 from exposure at work
 - Report w/in 8 hours of learning of the death
- ▶ EE In-Patient Hospitalization with COVID-19
 - Confirmed case of COVID-19 from exposure at work
 - Report w/in 24 hours of learning of the hospitalization
- ▶ Follow usual OSHA reporting Regs
- ▶ OSHA 300 Log



OSHA 100-EE ETS - Penalties



- ▶ **IOSHA Penalty Levels (“for each violation”)**
 - A. Posting/Reporting/Recordkeeping: Max of \$13,653
 - B. Other than Serious: Max of \$13,653
 - C. Serious: Min of \$9,639; Max of \$13,653
 - D. Failure to Correct: Max of \$13,653
 - E. Repeated: Max of \$136,532
 - F. Willful: Min of \$9,639; Max of \$136,532
- ▶ What is a “Violation” of the ETS?
- ▶ OSHA will consider GOOD FAITH EFFORTS to comply when assessing penalties



OSHA 100-EE ETS: Permanent Standard?



- ▶ Simultaneously w/ issuing the ETS, OSHA initiated the process to make it a Final Std
 - ⊖ ~~30~~ 45 day comment period ends ~~12.6.21~~ 1.29.22
- ▶ Questions raised by OSHA
 - Should it apply to ERs with less than 100 EEs?
 - Should requirements be stricter (e.g., all EEs be masked indoors)?
 - Should other science be considered?
 - Should it be a vaccine mandate w/o testing-&-masking as an options?
 - What policies do ERs have now and how were they implemented (e.g., testing, removal, vaccination)?





Iowa COVID-19 Vaccine, Testing, and Masking Laws

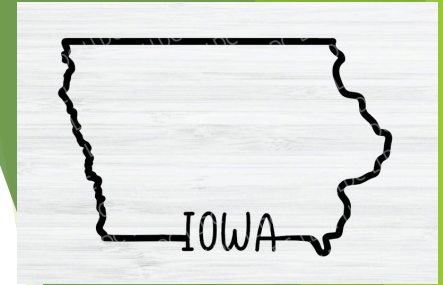


With Input from
Iowa Rep. John Forbes



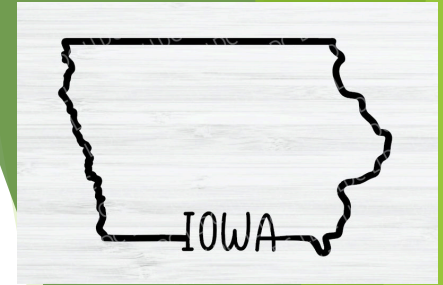
Iowa Vaccine Passport Law

- ▶ 5.20.2021 Signed by Gov. Reynolds (HF 889)
- ▶ Applies to business and gov't entities
- ▶ Cannot require proof of COVID-19 vax from
 - Customers
 - Patrons
 - Clients
 - Patients
 - Other persons invited onto premises
- ▶ Most commentators say EEs are not business invitees



Iowa Mask Mandate Law

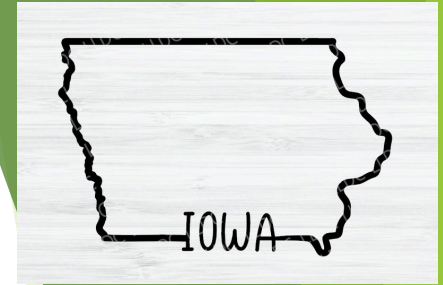
- ▶ 5.20.2021 Signed by Gov. Reynolds (HF 847)
- ▶ Part of Education Funding Bill
- ▶ Counties and Cities prohibited from adopting local laws about facial covering mandates that are more strict than State law
- ▶ Schools prohibited from adopting, enforcing, or implementing a policy requiring facial coverings on school buildings & grounds for:
 - EEs
 - Students
 - Members of the public
 - (There are a few exceptions in the law)



Iowa Vaccine Waiver Law

- ▶ 10.29.2021 HF 902 became law and was immediately effective
- ▶ Vaccine Waiver if ER Mandates COVID-19 Vaccine - New Chapter 94
 - Medical
 - Stmt: Would be “injurious to health and well-being” of EE
 - Stmt: EE’s vax would be “injurious to health and well-being” to an individual residing with EE
 - Religious
 - Stmt: Would “conflict with the tenets and practices of a religion” to which EE “is an adherent or member.”
- ▶ Unemployment Eligibility for Loss of Job for Refusing COVID-19 Vaccine
 - Loss of job for refusing vax for any reason = Eligible for UI benefits
 - ER account not charged for these UI benefits = Come from UI Trust Fund
 - These UI benefits not used to calculate ER’s experience rating

<https://www.dickinsonlaw.com/blogs-articles/2021/10/29/what-does-the-new-iowa-vaccine-waiver-law-do>



COVID-19 Testing Options



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Thank You



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