

**Type:** Human Resources  
**Title:** **COVID-19 Vaccination Policy**  
**Date of Board Approval:** September 1, 2021  
**Notes:** Revised

### **Purpose**

The Board of Directors has adopted this policy consistent with its duty to provide a free public education to students, and to promote and protect the health, safety, and well-being of all students, families, and staff at City Garden Montessori School (CGMS); as well as the surrounding community. Special consideration has been given to the student population, many of whom are children under the age of 12 and not eligible for vaccination. For this reason, CGMS requires teachers, staff, and volunteers to get a COVID-19 vaccination in accordance with this policy. This policy was designed with guidance and recommendations from the FDA (Food and Drug Administration), CDC (Center for Disease Control), and the City of St. Louis Department of Health.

**Scope:** This policy applies to all teachers and staff members (full-time, part-time, seasonal, temporary, on-call, contracted, etc.) and volunteers working within the school.

### **Section 1. Policy**

In order to prioritize the safety of staff, students, and families, CGMS requires all employees and volunteers aged 16 and older to submit proof of vaccination prior to entering the school facilities. School facilities include all buildings and grounds. For the purposes of this policy, the school facilities also include any locations for activities conducted offsite, at which the employees and volunteers are working on behalf of the school (i.e. field trips, etc.).

### **Section 2. Timeline and Process**

Section 2.1. Current employees are required to demonstrate at least partial vaccination no later than September 15, 2021 and complete vaccination no later than October 15, 2021. To establish proof of vaccination, teachers and staff may present written evidence of vaccination from a healthcare provider. CGMS will maintain the confidentiality of all employee vaccination records. Documentation shall be submitted to the Chief Operating Officer (COO).

Section 2.2. Any employee who does not comply will be subject to disciplinary action up to and including termination. Individuals covered under this policy that obtain an approved exemption shall be subject to COVID-19 testing twice per week.

Section 2.3. Effective September 2, 2021, new employees will be required to submit proof of vaccination as part of their "new hire paperwork" and will be required to indicate proof of vaccination prior to beginning work.

## **Section 3. Request for Exemptions**

### **Section 3.1. Disability Accommodation**

CGMS provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. If you believe you need an accommodation regarding this policy because of a disability, you are responsible for requesting a reasonable accommodation from the Chief Operating Officer. You must use and submit the form(s) provided by the School in order to be eligible for an exemption.

### **Section 3.2. Religious Exemption**

CGMS provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated. If you believe you need an accommodation regarding this policy because of a sincerely held religious belief, you are responsible for requesting a reasonable accommodation from the Chief Operating Officer. You must use and submit the form(s) provided by the School in order to be eligible for an exemption.

### **Section 3.3. Exemption for Other Medical Reasons**

Consistent with applicable CDC guidance and information regarding vaccine risks and vaccine allergies, exemptions for other reasons may be available on a case-by-case basis for a medical condition. Exemptions will be considered if the COVID-19 vaccine is contraindicated for a medical condition that the employee has, even if it does not qualify as a disability under federal, state, or local law. Employees are responsible for requesting any exemption for Other Medical Reasons from the Chief Operating Officer. You must use and submit the form(s) provided by the School in order to be eligible for an exemption.

## **Section 4. Determining Eligibility for Exemption and Follow-up**

Section 4.1. Upon receiving the request, The COO or their designee, will begin the interactive process to determine if reasonable accommodations can be made.

- CGMS may request and review, but is not limited to, relevant medical documentation (which may include direct contact with the medical professional) and interviews with the employee.
- Such requests will require the staff member to release pertinent medical information to the COO or their designee.
- CGMS will engage in this interactive process to determine if a reasonable accommodation can be made, while avoiding undue hardship to the School and direct threats to the health and safety of other employees in the workplace.
- CGMS will make a determination regarding the requested exemption within 5 working days of receiving the request.

Section 4.2. Retaliation against anyone for requesting an accommodation under this policy is prohibited. If you believe you are experiencing retaliation, please contact the Chief Executive Officer.

Section 4.3. CGMS shall disclose this policy upon hiring any new employee. If the new employee intends to request an accommodation under this policy, the request should be made in writing within 5 days of being hired and prior to reporting to work. The interactive process described above (for current employees) will be completed prior to the new employee reporting to work.