



## TCSPP Policy

<b>TITLE:</b>	COVID-19 Vaccination Requirement
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<b>ORIGIN:</b>	Office of the President

### **System Office Review (*if applicable*)**

Office of the General Council (September 2021 – Version 1)

Office of the General Council (October 2021 – Version 2)

### **TCSPP Approval**

Executive Cabinet/TCSPP President (September 2, 2021 – Version 1)

Executive Cabinet/TCSPP President (October 2021 – Version 2)

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## COVID-19 Vaccination Requirement Policy

### **Policy Statement**

The COVID-19 Vaccination Requirement policy details the COVID-19 vaccination requirements for Students and Employees at The Chicago School of Professional Psychology (TCSPP). All Students and Employees who access a TCSPP campus or attend a TCSPP-sponsored event will be required to be fully vaccinated for COVID-19, with limited exemptions as described below.

### **Policy Purpose**

This policy is intended to minimize outbreaks of COVID-19 among the TCSPP community; to prevent or reduce the risk of transmission of COVID-19 at TCSPP campuses and TCSPP-sponsored events; and to promote the public health of the community consistent with federal, state, and local efforts to stem the pandemic.

### **Applicability**

With the exception of Employees and Students of the Chicago Campus, and Students of the Dallas Campus, individuals must comply with this policy by December 19, 2021. For new Employees other than those of the

Chicago Campus whose first date of employment is after December 19, 2021, the deadline to comply with this policy is 30 days after the date of hire. For Students starting or returning to campus after December 19, the deadline is the first date of instruction for the term when they first enroll or return to campus.

All Students and Employees of the Chicago Campus are subject to one of the three requirements outlined below which have been established to align with the State of Illinois' COVID-19 Executive Order No. 2021-20 released on August 26, 2021. To access the TCSP Chicago Campus or TCSP-sponsored events, all Students and Employees of the Chicago Campus must either:

1. Obtain, at a minimum, the first dose of an approved two-dose COVID vaccine series or an approved single-dose COVID-19 vaccine as defined in this policy by September 5, 2021, and provide proof of full vaccination as defined in this policy by October 5, 2021; or
2. Undergo testing for COVID-19 at least weekly, unless and until they establish they have been fully vaccinated per this policy; or
3. Undergo testing for COVID-19 at least weekly if they have been granted an exemption. As of December 19, 2021, the only unvaccinated individuals that will be permitted on the Chicago Campus will be those who have been granted a medical or religious exemption as defined in this policy AND who undergo testing for COVID-19 at least weekly.

Per Texas law, Students of the Dallas Campus are not required to provide documentation certifying COVID-19 vaccination or post-transmission recovery to access and utilize the campus. All Students of the Dallas Campus who are engaged in clinical or field training experiences are, however, required to adhere to the requirements regarding vaccination and proof of vaccination established by their training sites in order to remain placed at those sites.

This policy is subject to amendment, especially as the COVID-19 pandemic continues to evolve. In the event that a federal, state or local governing public health agency imposes a requirement that conflicts with this policy, the applicable public health mandate shall govern and be implemented. Please refer to the Student Handbook, Employee Handbook, employee intranet, or student gateway website for the most current version of this policy. TCSP complies with all guidance from the CDC, OSHA and state and local public health authorities.

In addition to this policy, all Students and Employees are required to comply with any additional safety requirements outlined in the most current COVID-19 Campus Operations Plans, posted on the TCSP Community Site. Students from TCSP at Xavier University of Louisiana (XULA) are required to comply with any additional safety requirements established by XULA.

## Definitions

COVID-19 Vaccine Series: A COVID-19 Vaccine Series satisfies the requirements of this policy if the U.S. Food and Drug Administration (FDA) has authorized use of the specific COVID-19 Vaccine, including approval through an [License or an Emergency Use Authorization](#) as indicated on the FDA website: License or an Emergency Use Authorization (EUA) or the World Health Organization has approved Emergency Use Listing (EUL).

Employees: TCSP staff and faculty, including adjunct employees, contractors, volunteers, student employees, and interns except for those employees, contractors, volunteers, student employees and interns whose positions are fully remote. An Employee is considered fully remote if they have no physical presence on campus and do not attend any TCSP-sponsored event.

Employees' final permission to be exempt from this policy based on remote work arrangements must be obtained through Human Resources who will work with appropriate University Leadership to make the determination.

Fully Vaccinated: A person is considered “fully vaccinated” when two weeks have passed since they completed a COVID-19 Vaccine Series (for example, 1 dose of the Janssen/J&J vaccine, or 2 doses within no more than 12 weeks of the Moderna or Pfizer/BioNTech (Comirnaty)).

TCSPP anticipates that the Center for Disease Control (CDC) may update the definition of Fully Vaccinated once booster shots are available and, in order to continue to be classified as fully vaccinated, Employees and Students will be required to obtain the booster shot and to provide proof of vaccination. Employees and Students will be notified of the deadline for compliance once additional information about boosters is available.

Proof of Vaccination: Proof of Vaccination that an individual is fully vaccinated against COVID-19 includes either of the following:

- A paper or electronic copy of a CDC COVID-19 vaccination card; and
- A medical record issued by a licensed health care provider indicating vaccine name and dates of administration.

Proof of Vaccination against COVID-19 must legibly show:

1. Name of the individual vaccinated;
2. Date of birth of the individual vaccinated;
3. The manufacturer of the vaccine; and
4. The date(s) on which the vaccine was administered.

Students: All TCSPP students, including students on practicum, internship, or completing any academic or degree requirement in any TCSPP educational program, except for those students whose complete course of study is entirely web-based, a fully online degree program, fully remote and who have no physical presence on campus and do not attend any TCSPP-sponsored event, and/or who attend a ground program at the Dallas Campus location.

TCSPP Campus locations: TCSPP Campus locations include:

- TCSPP Anaheim
- TCSPP Chicago
- TCSPP Dallas
- TCSPP Los Angeles
- TCSPP San Diego
- TCSPP Washington D.C.
- TCSPP @ XULA

TCSPP-sponsored event: Any TCSPP event (e.g. commencement, residency, team-based meeting or activity) that takes place at a location outside of a TCSPP campus location.

## **Procedures**

To comply with this policy, all Students and Employees (new and continuing) will need to submit proof of vaccination or have an approved exemption on the timeline(s) specified above.

See the “Definitions” section for more detail on what vaccines and documentation will satisfy this requirement.

All records and information submitted to demonstrate compliance with this policy shall be considered confidential information, will be maintained separately from an Employee’s personnel file or from a student’s educational record, and will only be accessible to TCSPP personnel who have a business need to access the information.

## **A. Submitting Proof of Vaccination**

### **Reporting Procedure for New and Continuing Students:**

1. Students must submit proof of vaccination in the Academic Portal using the proof of vaccine link found on the Community Site homepage. This allows them to enter their vaccine information and then upload their documentation of proof.
2. Proof of vaccination will be reviewed within one (1) week of submission. Students will be informed if their proof of vaccination was approved or rejected.
  - a. Records will be reviewed by Student Support. Reasons for rejection might include a blurry or unclear image, wrong image, missing required element, and/or a falsified record. In the event a Student's proof of vaccination is rejected, the Student will be given additional opportunities to upload acceptable proof, if necessary.
  - b. After December 19, 2021, Students whose submission is rejected will be unable to access campus until such time as additional proof is submitted and accepted. Any consequences related to being unable to access campus during this time period will be the responsibility of the Student. The University is not required to provide remote instruction alternatives in cases where proof of vaccination failed to meet the requirements of this policy.
3. Proof of vaccination will be maintained in a confidential manner, separate from each Student's full educational record. Access will be limited.

### **Reporting Procedure for Employees:**

1. Employees must submit proof of vaccination through Workday. Employees should login to Workday and follow the prompts in the link found in the announcement section of the home page of Workday to submit their proof of vaccination.
2. Employees will receive confirmation of receipt of proof of vaccination by email, but this receipt does not mean that the proof of vaccination has been approved.
3. Proof of vaccination will be reviewed by TCSPP Human Resources within one (1) week of submission. Employees will be informed if their proof of vaccination was rejected.
  - a. Records will be reviewed by Human Resources. Reasons for rejection might include a blurry or unclear image, wrong image, missing required element, and/or a falsified record. In the event an Employee's proof of vaccination is rejected, the Employee will be given additional opportunities to upload acceptable proof, if necessary.
  - b. Employees whose submission is rejected will be unable to access campus after December 19, 2021, until such time as additional proof is submitted and accepted. Any consequences related to being unable to access campus during this time period will be the responsibility of the Employee. The University is not required to provide remote work alternatives in cases where proof of vaccination failed to meet the requirements of this policy.
4. Proof of vaccination is stored in each Employee's official record and will be separate from the employee's personnel file. Access will be limited to Human Resources only, not the Employee's current or future manager(s).

## B. Exemptions and Related Procedures

All Students and Employees are subject to TCSPP's COVID-19 Vaccination Requirement unless they qualify for an exemption. All Students and Employees seeking an exemption must submit the required documentation prior to the December 19, 2021 deadline, and in accordance with any deadlines provided by Human Resources or their respective Campus Dean.

There are three types of exemptions:

**Medical Exemption:** Students and Employees may be exempted from the COVID-19 Vaccination Requirement if they have medical contraindications, precautions, or other medical conditions/disabilities for which a licensed healthcare provider certifies that the individual is unable to receive the vaccine. A medical contraindication or precaution to COVID-19 vaccination recognized by [U.S. Center for Disease Control and Prevention](https://www.cdc.gov/). A contraindication is a condition in a recipient that increases the risk for a serious adverse reaction. A precaution is a condition in a recipient that might increase the risk for a serious adverse reaction, might cause diagnostic confusion or might compromise the ability of the vaccine to produce immunity.

### Process to Request a Medical Exemption:

Employees: A licensed medical provider must complete the COVID-19 Vaccination Requirement Medical Exemption Request for Employees form found on the TCSPP Intranet, and the Employee must submit the completed form with their request to [national-HR@thechicagoschool.edu](mailto:national-HR@thechicagoschool.edu).

Students: A licensed medical provider must complete the COVID-19 Vaccination Requirement Medical Exemption Request for Students form found on the TCSPP Community Site's COVID-19 Resource Hub, and the Student must submit the completed form with their request.

**Religious Exemption:** Students and Employees may be exempted from the COVID-19 Vaccine Requirement if the vaccination conflicts with their sincerely held religious beliefs, practice or observance.

### Process to submit a Religious Exemption:

A religious exemption requires a signed written statement describing the reason for the exemption and must include the following:

1. A thorough explanation of the reason for your exemption request in your own words.
2. A detailed description of the sincerely held religious belief, practice, or observance that guides your objection.
3. An indication of whether this personal or religious belief constitutes an objection to all immunizations or only the COVID-19 vaccination; if it is not an objection to all immunizations, you must explain the personal or religious basis for not receiving this particular immunization.

Students: Students must submit the completed request form in Maxient.

Employees: Employees must submit the completed request form to [national-HR@thechicagoschool.edu](mailto:national-HR@thechicagoschool.edu)

**Chicago Campus Testing Requirement for Those with Approved Exemptions:** Chicago campus Students and Employees who qualify for an exemption are required to submit proof of negative COVID-19 test on a weekly basis at minimum. Tests must be uploaded each week at the date and time specified in the applicable Campus COVID-19 Operational Plan. Test results must have been received within 72 hours of submission. Tests results dated within 72 hours of submission and uploaded by the specified date and time will be valid for one week as defined in the Chicago Campus COVID-19 Operational Plan.

Students who do not submit the proof of a negative COVID-19 test by the required date and time may still access campus or a TCSPP-Sponsored event only if they show proof of a negative COVID-19 test dated within 72 hours of arrival to campus or the event.

Employees who do not submit the proof of a negative COVID-19 test on the required date and time may still access campus or a TCSPP-Sponsored event only if they arrange via appointment to show a TCSPP HR representative proof of a negative COVID-19 test dated within 72 hours of arrival to campus or the event.

### **C. Accountability and Violations**

Students and Employees who fail to comply with TCSPP's COVID protocols, vaccine requirement, providing proof of vaccination, social distancing, testing, or the safety measures contained in their respective campus COVID-19 operational plan will be subject to discipline, up to and including dismissal from employment or educational programs. Employees and Students who receive an exemption from the vaccination requirements will be notified of and required to strictly comply with TCSPP testing and safety protocols which may change from time to time as circumstances and guidance from local, state and federal public health officials dictate.

Employees who are not eligible for an exemption from vaccination requirements for the reasons stated in this policy and who refuse to comply with the health and safety protocols as contained either in this policy and/or the applicable Campus COVID-19 Operational Plan should contact Human Resources to explore whether options exist to allow them to continue their employment (e.g., temporary unpaid leave of absence pending compliance). Such requests will be considered on a case-by-case basis and subject to business and operational necessity.

Students who are not eligible for an exemption from vaccination requirements for the reasons stated in this policy and who refuse to comply with the health and safety protocols as contained either in this policy and/or the applicable Campus COVID-19 Operational Plan should contact Student Support to explore whether options exist to allow them to continue their educational program. Such requests will be considered on a case-by-case basis.

TCSPP prohibits all forms of retaliation against any Students and Employees who may seek an exemption from this policy.

Employees or Students who submit falsified vaccination records will be subject to discipline, up to and including dismissal from employment or educational programs.