



TCSPP Policy

TITLE:	COVID-19 Vaccination Requirement
APPROVAL DATE:	September 2, 2021
EFFECTIVE DATE:	September 7, 2021
SCOPE:	University-wide
ORIGIN:	Office of the President

System Office Review (if applicable)

Office of the General Council (September 2021)

TCSPP Approval

Executive Cabinet/TCSPP President (September 2, 2021)

COVID-19 Vaccination Requirement Policy

Policy Summary

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 (detailed below).

With the exception of Employees and Students of the Chicago Campus, and Students of the Dallas Campus, individuals must comply with this policy by November 1, 2021. For new Employees other than those of the Chicago Campus whose first date of employment is after November 1, 2021, the deadline to comply with this policy is 30 days after the date of hire. For Students starting or returning to campus after November 1, 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 TCSPP Chicago Campus or TCSPP-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 November 1, 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 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.

This policy is subject to amendment, especially as the COVID-19 landscape continues to change and vaccination protocols continue 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, student gateway website, or TCSPP Community Site's COVID-19 Resource Hub for the most current version of this policy.

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 TCSPP Community Site. Students from TCSPP at Xavier University of Louisiana (XULA) are required to comply with any additional safety requirements established by XULA.

Definitions of Key Terms

Employees	<p>TCSPP 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 TCSPP-sponsored event.</p> <p>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.</p>
Fully Vaccinated	<p>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).</p> <p>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.</p> <p>A COVID-19 Vaccine 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 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).</p>
Proof of Vaccination	<p>Acceptable proof that an individual is fully vaccinated against COVID-19 includes:</p> <ul style="list-style-type: none"> • A paper or electronic copy of a CDC COVID-19 vaccination card • A medical record issued by a licensed healthcare provider indicating vaccine name and dates of administration <p>Proof of full vaccination against COVID-19 must legibly show:</p> <ol style="list-style-type: none"> 1. Name of the individual vaccinated 2. Date of birth of the individual vaccinated 3. The manufacturer of the vaccine 4. The date(s) on which the vaccine was administered
Students	<p>TCSPP Students, including Students on practicum, internship, or completing any academic or degree requirement in any TCSPP educational program, except for Students:</p> <ul style="list-style-type: none"> ○ Whose complete course of study is entirely web-based or a fully online degree program; and/or ○ Who are 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	<p>TCSPP Anaheim TCSPP Chicago TCSPP Dallas TCSPP Los Angeles TCSPP San Diego TCSPP Washington D.C.</p>

	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.

Submitting Proof of Vaccination

All TCSPP Students and Employees are subject to TCSPP's COVID-19 Vaccination Requirement. To comply with this policy, all Students and Employees will need to submit proof of vaccination or have an approved exemption on the timeline(s) specified above.

See TCSPP's COVID-19 Vaccination Requirement policy "Definitions of Key Terms" 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.

Reporting Procedure for New and Continuing Students:

1. Students must submit proof of vaccination 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 rejected.
 - a. Records will be reviewed by Student Support. Reasons for rejection might include a blurry or unclear image, wrong image, and/or a falsified record. In the event a Student's proof of vaccination is rejected, the Student will be informed of the reason(s) for rejection and given additional opportunities to upload acceptable proof, if necessary.
 - b. After November 1, 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.
3. Proof of vaccination will be maintained in a confidential manner, separate from each Student's main 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 homepage 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, and/or a falsified record. In the event an Employee's proof of

vaccination is rejected, the Employee will be informed of the reason(s) for rejection and given additional opportunities to upload acceptable proof, if necessary.

- b. After November 1, 2021, Employees 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 Employee.
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).

Exemptions (All Locations Except Students and Employees of the Chicago Campus and Students of the Dallas Campus)

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 November 1, 2021 deadline, and in accordance with any deadlines provided by Human Resources or their respective Campus Dean.

There are three types of exemptions:

1. **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. Medical contraindications or precautions to COVID-19 vaccination are those that are recognized by the U.S. Centers for Disease Control and Prevention. Contraindications and precautions are a condition that may increase the risk for a serious adverse reaction to the vaccine, may cause diagnostic confusion if the vaccine is administered, or may compromise the ability of the vaccine to produce immunity.

To Request a Medical Exemption:

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.

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.

2. **Religious Exemption:** Students and Employees may be exempted from the COVID-19 Vaccination Requirement if the vaccination conflicts with their sincerely held religious beliefs, practices, or observances. A general philosophical or moral objection to vaccination shall not suffice as the basis for exemption on religious grounds.

To Request 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 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 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.

3. **Remote Work or Study Exemption:** Employees may be exempted from the COVID-19 Vaccination Requirement if their position is fully remote. An Employee is considered fully remote if they have no physical presence on campus and do not attend any TCSPP-sponsored event. Approval for an Employee to be considered fully remote must be obtained from the Campus Dean for Employees of a campus, or the relevant Executive Cabinet member for University Employees.

Students may be exempted if their complete course of study is entirely web-based, a fully online degree program, and/or fully remote and they have no physical presence on campus and do not attend any TCSPP-sponsored event.

Fully remote Employees and Students are not permitted to access a campus or TCSPP-sponsored event unless they are fully vaccinated. Any consequences related to being unable to access a campus or TCSPP-sponsored event during this time period will be the responsibility of the Student or Employee.

Exemptions (Chicago Campus Only)

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. 87 released on August 26, 2021. 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 November 1, 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.

Accountability and Violations

Students and Employees who fail to comply with TCSPP's COVID protocols, vaccine requirement in this policy, social distancing, or any other safety measures contained in the applicable TCSPP COVID-19 Campus Operations Plans will be subject to discipline, up to and including dismissal from employment or educational programs. Employees or Students who submit falsified vaccination records will be subject to discipline, up to and including dismissal from employment or educational programs. Employees and Students who receive an exemption from the COVID-19 Vaccination Requirement will be notified of and required to strictly comply with TCSPP's testing protocols (where applicable) 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 this requirement 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. Following the stated deadline, Employees unable to return to work or access a TCSPP location due to not being fully vaccinated or having received an exemption will be subject to the attendance and punctuality provisions of the Employee Handbook and will be subject to disciplinary action, up to and including termination.

Students who are not eligible for an exemption from vaccination requirements for the reasons stated in this policy and who refuse to comply with this requirement 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.

Following the stated deadline, students unable to return to their program or access a TCSPP location due to not being fully vaccinated will be subject to the consequences of unexcused absences as stated in their course syllabi up to and including failing their course(s) and/or being withdrawn due to non-attendance.

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