UNIVERSITY OF WASHINGTON COVID-19 VACCINATION POLICY

1. INTRODUCTION

To help reduce the potential for COVID-19 transmission and severe illness, the University of Washington requires University personnel and students to be vaccinated against COVID-19 or have a University-authorized medical or religious exemption. UW Medicine medical facility clinical personnel must follow the UW Medicine COVID-19 Vaccination Policy.

On August 5, 2022, Governor Inslee issued Directive #22-13.1, COVID-19 Vaccination Standards for State Employees, which directed a COVID-19 vaccination requirement as a condition of employment for state executive and small cabinet agencies, and encourages higher education institutions to consider similar requirements. Although the emergency proclamation expired on October 31, 2022, COVID-19 continues to impact people's lives and their health, and therefore, the state of Washington has adopted rules to continue the vaccination requirement for most state employees. Given the University of Washington is a higher education institution, implementing the state vaccination requirement rules is optional. However, as a state employer and institution of higher education, the University of Washington is committed to protecting the health and welfare of University personnel and students, and has aligned with state vaccination requirements.

COVID-19 vaccines have been proven to be safe and effective at reducing the risk of becoming infected with SARS-CoV-2 (the coronavirus that causes COVID-19), in preventing severe illness and death in those who develop COVID-19, and in limiting the spread of COVID-19. Vaccines are one of the most critical and effective elements for reducing the risk of COVID-19 transmission and severe illness.

2. DEFINITIONS

The following terms and definitions are used in this vaccination policy.

**Authorized exemption**: A University-approved waiver from the vaccination requirement for medical or religious reasons.

**Authorized vaccine**: FDA-authorized or World Health Organization-authorized vaccine. This includes emergency use authorization.

**Condition of employment and/or other University-compensated appointment**: An individual cannot be an employee or an appointee compensated by the University if they are not vaccinated or if they do not have a University-authorized medical or religious exemption.

**Vaccinated**: For purposes of this policy, a person is considered vaccinated two weeks after they have received recommended doses of the primary vaccine series of an authorized COVID-19 vaccine.
Medical exemption: A University-approved waiver from the vaccination requirement on the basis that a medical reason has been evaluated by a personal health care provider and it was determined that an individual has a medical contraindication to receiving a COVID-19 vaccine.

Religious exemption: A University-approved waiver from the vaccination requirement on the basis that it conflicts with sincerely held religious beliefs.

Undue hardship: The University will apply appropriate state and federal laws to individually analyze whether a requested exemption constitutes an undue hardship. Considerations relevant to undue hardship determinations can include, among other things, the employee's or University-compensated appointee's job duties; work or training location; contact with other personnel, students, or patients; and/or the costs, whether economic or non-economic, to the University.

Unit leader: An individual reporting directly to the UW president or provost.

3. POLICY AND APPLICABILITY

This policy applies to all University personnel as defined in Administrative Policy Statement 40.1 who receive compensation from the University such as wages, stipends, or fees, as well as all matriculated and non-matriculated students, unless specifically excluded below.

All personnel are required to receive a primary COVID-19 vaccine series or have a University-authorized medical or religious exemption. Compliance is a condition of employment and/or a University-compensated appointment. Unless a medical or religious exemption has been authorized, personnel are required to provide proof of COVID-19 vaccination within three business days of their first day of employment or University-compensated appointment. Unpaid appointees who have been assessed by the University and excluded from the vaccination requirement but who later are considered for compensation from the University will be subject to this policy; a vaccination verification process will be performed before they can engage in University-compensated work or training. UW Medicine medical facility clinical personnel follow the UW Medicine COVID-19 Vaccination Policy. UW School of Medicine and non-clinical personnel are subject to this University policy.

All students are required to receive a primary COVID-19 vaccine series or have a University-authorized medical or religious exemption. Compliance with this policy is a condition for course registration for all students and enrollment for new students.

- Students working or training in UW Medicine clinical or other settings, including students participating in the Health Sciences Immunization Program (HSIP), may be subject to additional requirements as a result of their participation in clinical activities or clinical training.
- Student employees must provide proof of vaccination or receive a University-authorized medical or religious exemption in both their student and employee role.
Although COVID-19 vaccine boosters are not required by this policy, the UW strongly encourages personnel and students to receive a booster vaccine and remain up-to-date on COVID-19 boosters. University personnel may use paid work time of up to 2 hours to receive their COVID-19 vaccinations.

4. EXCLUSIONS FROM THIS VACCINATION POLICY

The following groups are excluded from this policy based on their relationship with the University. Individuals excluded from this policy are strongly encouraged to get vaccinated and remain up-to-date on their COVID-19 vaccination. All individuals must adhere to all other University COVID-19 health and safety policies, including the University’s COVID-19 Face Covering Policy when visiting a University location.

A. Excluded personnel categories:

- Unpaid academics, including affiliate faculty, clinical faculty (non-salaried), emeritus faculty, emeritus librarians, visiting scholars, or clinical associates
- Employees or University-compensated appointees who work outside of the state of Washington and are located in a state or other jurisdiction where a vaccine requirement is legally prohibited
- Contingent workers

B. Excluded student categories:

- Students in the Osher Lifelong Learning Institute
- Students enrolled in high school programs with an affiliation with the University (e.g., UW in the High School)
- Students enrolled in programs for youth and teens

C. Contractors, vendors, suppliers, volunteers, visitors:

Vaccination verification or attestation is not required for contractors, suppliers, vendors, volunteers or visitors in most settings. Please note, contractors include, among others, academic personnel who are paid solely through a paid direct (PDR) salary plan by a non-University entity. However, vaccination is still strongly recommended. University health care facilities and some other settings (e.g., field research, research vessels, SARS research labs) may require proof of vaccination or a negative COVID-19 test for entry/participation. Individuals in this category are required to comply with the hosting unit, facility, or event organizer’s specific requirements.

5. VACCINATION VERIFICATION PROCEDURES

University personnel and students subject to this policy are required to follow the compliance procedures below.

**Personnel, including student employees:** Vaccination documentation or exemption requests are reviewed and determined as part of the hiring process for new staff or student employees.
The student vaccination verification process is conducted by UW Hall Health Center. Students are required to verify their vaccination status through the online secure UW COVID-19 Vaccination Verification form for review. The deadline to upload documentation is prior to orientation and registration for the next quarter. Students will not be able to enroll in classes until this requirement is complete.

- Students who are also employed by the University must complete the student form and have their vaccination status verified through the process for personnel outlined in this document.
- Students in health sciences programs requiring participation in the Health Sciences Immunization Program (HSIP) follow the processes and deadlines of the HSIP, instead of completing the Hall Health Center verification. A list of HSIP-participating health sciences programs is available on the HSIP webpage.
- Students planning to be vaccinated should wait until after receiving their last shot before completing the verification process.

Students and employees who submit false or inaccurate information during the verification process are subject to disciplinary procedures that can include dismissal from the University.

6. MEDICAL AND RELIGIOUS VACCINE EXEMPTIONS AND DISABILITY ACCOMMODATIONS

Exemptions may be sought for documented medical conditions and sincerely held religious beliefs. Individuals who receive exemptions may be required to follow additional safety measures. Exemptions to the vaccination requirement can be denied despite a documented medical condition or sincerely held religious belief if granting the exemption creates an undue hardship. All individuals must adhere to all other University COVID-19 health and safety policies, including the University’s COVID-19 Face Covering Policy when visiting a University location.

**Personnel, including student employees:** Prospective employees and/or University-compensated appointees may request medical or religious exemptions during the selection and hiring process. Final candidates for staff, academic student employee and student employee positions will be informed about the vaccination requirement and the medical and religious exemption process during the conditional offer of employment stage. The procedures for requesting medical and religious exemptions can be found on the UW COVID-19 Vaccination Requirement website.

- **Medical exemption and accommodation:** Prospective employees and/or University-compensated appointees with an underlying medical condition and/or disability that prevents them from receiving an authorized COVID-19 vaccine must have their healthcare provider complete the UW COVID-19 Medical Exemption Form, which will be reviewed by the UW Environmental Health & Safety Department Employee Health Center medical staff.
- **Religious exemption and accommodation:** Prospective employees and/or University-compensated appointees with a sincerely held religious belief, practice, or observance that prevents them from being vaccinated against COVID-19, are required to complete the online Vaccine Religious Accommodation Request Form, which will be reviewed by UW Human Resources (for staff) or the Office of Academic Personnel (for faculty, librarians and other academic personnel).

**Students:** Students with a medical condition or deeply held religious belief that prevents them from receiving a COVID-19 vaccine are required to submit a COVID-19 Medical or Religious Exemption Request to UW Hall Health Center. Students who are temporarily unable to get vaccinated for reasons beyond their control may submit a Temporary Extension Request Form. The deadline to provide this documentation is prior to orientation and registration. Students seeking an exemption or extension will not be able to enroll in classes until they upload one of the forms below. Students enrolled in health sciences programs that participate in HSIP follow HSIP processes and deadlines. The procedures for requesting medical and religious exemptions and temporary exemption requests can be found on the [UW COVID-19 Vaccination Requirement website](#).

Individuals unable to get vaccinated against COVID-19 due to participation in a COVID-19 vaccine clinical trial and those who reside in countries other than the United States who are unable to get vaccinated against COVID-19 with reasonable effort and expense are exempt from this requirement. However, the latter individuals are expected to get vaccinated upon arriving in the United States.

**Medical or health risk accommodation:** Declaring a COVID-19 vaccination medical exemption is *not the same* as requesting a medical or health risk accommodation due to potential increased risk of severe illness or death from COVID-19. University personnel seeking medical or health risk accommodations should consult with the [Disability Services Office (DSO)](#). University students seeking a medical or health risk accommodation should consult with [Disability Resource for Students (DRS)](#).

**7. ROLES AND RESPONSIBILITIES:**

The following outlines the COVID-19 Vaccination Policy roles and responsibilities.

**Environmental Health & Safety Department:**
- Oversight of University public health programs; develop University-wide policies and guidelines for public and occupational health and safety.
- Implement medical exemption review and determination process.
- Implement Health Sciences Immunization Program vaccination verification process.

**Hall Health Center:**
- Oversight and implementation of student health programs, including immunization verification programs.

**University Human Resources and Office of Academic Personnel:**
• Coordinate and guide the vaccination verification process with units.
• Review religious exemption requests for academic personnel, staff, and student employees.

Unit leaders:
• Ensure applicable personnel and students in their units are aware of and adhere to this policy.
• Ensure all supervisors and managers are aware that vaccination information is handled as private and confidential between personnel and their supervisor or manager, and is not used, shared, or disclosed for purposes unrelated to this policy.

Unit supervisors and managers:
• Ensure all vaccination information is handled as private and confidential between the employee and the supervisor or manager, and is not used, shared or disclosed for purposes unrelated to this policy.
• Ensure University personnel who are not vaccinated adhere to any enhanced workplace safety and public health requirements as required (e.g., masking).

Unit authorized Workday roles:
• Perform the vaccination verification process and ensure all vaccination information is handled as private and confidential and is not used, shared or disclosed for purposes unrelated to this policy.

University personnel:
• Must adhere to this policy as a condition of employment and/or University-compensated appointment.
• Who are not vaccinated must adhere to any enhanced University safety and public health requirements as required (e.g., masking).

University students:
• Are required to submit an electronic UW COVID-19 Vaccination Verification Form by the deadlines stated in this policy.
• Who are not vaccinated must adhere to any enhanced University safety and public health requirements as required (e.g., masking).

8. DATA PRIVACY AND RECORDS RETENTION

Vaccination information is considered confidential medical information under the Americans with Disabilities Act (ADA) and is exempted from disclosure under the Public Records Act.

• Managers may not use, share or disclose this information for any purpose other than upholding compliance with state regulations.
• Employees may not ask colleagues about their vaccination status.
• Instructors may not ask students about their vaccination status, nor will they have access to students’ records or be expected to confirm students’ vaccination status.

The individual-level data are collected and used by the Executive Office and personnel supervisors and managers in accordance with state requirements to inform UW operations and to comply with regulatory requirements. Information is only used for these purposes.

The information received in the COVID-19 vaccination forms is private and confidential. These records are maintained separately from other unit records, except when the records relate to non-compliance by personnel and students; in that event, the record may be maintained in code of conduct or disciplinary records.

Access to these records is based on the need to know to achieve the above. The development of reports, disclosure of data, whether identifiable, de-identified, pseudonymized, or in aggregate are determined by the following groups:

• **Personnel data**: The Data Governance Human Resources Data Domain Council in collaboration with the associate vice provost for Privacy, senior director of Environmental Health & Safety and their designees
• **Student data**: The director of Hall Health, University registrar, and associate vice provost for Privacy, senior director of Environmental Health & Safety and their designees

Personnel COVID-19 vaccination-related documentation (including vaccination verification, exemption requests and related documentation) must be retained for six years from the end of the fiscal year in which the form was received.

Student COVID-19 vaccination forms, exemption requests, and related documentation are an educational record and must be retained for six years from when the degree is awarded or last activity. Student employee documents are both an employee and educational record. Both personnel and student retention schedules are approved by the Washington State Records Committee.

**9. POLICY ENFORCEMENT**

**Personnel**: Employees or University-compensated appointees who are inadvertently hired or appointed without verification of vaccination or an authorized exemption must provide proof of vaccination or a University-authorized exemption upon notification. Their employment and/or University-compensated appointment will end if they fail to do so.

**Students**: Students who have not submitted the UW COVID-19 Vaccination Verification form by the deadlines will be subject to registration holds.

**10. RESOURCES:**

• [UW COVID-19 vaccination requirement website](https://www.ehs.washington.edu)
• [UW COVID-19 facts and resources webpage](https://www.ehs.washington.edu)