Recently, President Joe Biden signed executive orders requiring federal workers and contractors to get vaccinated against COVID-19. Now, the Occupational Safety and Health Administration (OSHA) has been directed to issue an emergency temporary standard (ETS) imposing similar requirements for private employers. According to the White House, the rule will require all businesses with 100 or more employees to ensure workers are either tested for COVID-19 once a week or fully vaccinated.

Presented by Relion Insurance Solutions

At this time, the OSHA ETS is still in development. This checklist is a jumping-off point for your organization as you prepare for the upcoming rule. Not all items will apply to all employers in every circumstance.

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| COVID-19 Vaccine and Testing Policy Development | **Yes** | **No** | **N/A** |
| Has your organization determined whether OSHA’s upcoming ETS will apply to your workplace? |  |  |  |
| Has your organization begun taking steps to draft or update a COVID-19 vaccine/testing policy—particularly one that complies with the upcoming OSHA ETS? |  |  |  |
| Has your organization considered whether your policy will allow employees to receive weekly COVID-19 testing in lieu of vaccination? |  |  |  |
| Has your organization considered how your policy will include a provision for employees to take paid time off to receive the vaccine, and, if necessary, take paid time off work due to potential side effects? |  |  |  |
| Has your organization considered how your policy will outline a date on which vaccination will be required? |  |  |  |
| Has your organization considered how your policy will outline how employees can certify they have received a vaccination? |  |  |  |
| Has your organization considered how your policy will enforce disciplinary actions for not complying by the designated deadline? |  |  |  |
| Has your organization considered how your policy, as specified in the ETS, will provide specific provisions for employees to request a medical or religious exemption to receiving the vaccine? |  |  |  |
| Has your organization considered how your policy, as specified in the ETS, will allow some employees to be exempt from a mandate (e.g., some full-time remote employees may be exempt)? |  |  |  |

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| Operations | **Yes** | **No** | **N/A** |
| Does your organization have a plan in place for confidentially documenting employee vaccination records in accordance with all applicable laws? |  |  |  |
| If applicable, does your organization have a plan in place for confidentially tracking employee COVID-19 test results in accordance with all applicable laws? |  |  |  |
| If applicable, has your organization planned out logistics for testing employees weekly? |  |  |  |
| Does your organization have a tested system in place to review medical or religious exemption requests, and, if necessary, make accommodations for employees? |  |  |  |
| Does your organization have a plan in place to address noncompliance from employees? |  |  |  |
| Has your workplace planned for potential staffing shortages due to employees taking time off to receive the vaccine or, if necessary, recover from potential side effects? |  |  |  |
| Does your organization have a plan in place to quickly share updates with employees as more information becomes available? |  |  |  |
| Does your organization plan to use multiple communication channels to reach all employees? |  |  |  |

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| **Employee Communication Topics** | **Yes** | **No** | **N/A** |
| ***Does your organization have a plan to communicate the following topics to employees?*** | | | |
| To whom do the vaccine and testing policies apply |  |  |  |
| Whether weekly COVID-19 testing is an option |  |  |  |
| If applicable, information on weekly COVID-19 testing |  |  |  |
| Where employees can receive a vaccine |  |  |  |
| Information on taking paid time off of work to receive the vaccine and recover from side effects |  |  |  |
| The date by which employees need to be vaccinated |  |  |  |
| How employees can verify their vaccine status |  |  |  |
| How employees should request an exemption |  |  |  |
| What consequences employees will face if they refuse to comply |  |  |  |

Large employers can use this checklist to begin preparing to comply with the upcoming OSHA ETS. Contact us today for more resources.