

# CURRY COLLEGE

## Mandatory COVID-19 Vaccination Policy

We appreciate how much our Students, Faculty, and Staff have adapted during this challenging time. As part of our commitment to safety and to reduce the risk of COVID-19, we have adopted a mandatory COVID-19 Vaccination program for our Students, Faculty, and Staff. For the safety of everyone, Curry College seeks to become a fully vaccinated community in all our campuses and teaching outlets, where all Students, Faculty, and Staff have completed their vaccination series to protect against COVID-19 prior to returning to campus, except those people who are unable to get the COVID-19 vaccine due to medical or other reasons.

### I. Definitions

1. The term **“Students”** shall mean all persons who are enrolled full-time and/or part-time at Curry College, including those auditing classes, irrespective of their academic standing, who seek education and shall include all returning, new, and transfer students, Undergraduate students, Continuing Education students, Graduate students, International students, and Dual Enrollment Program students (high school students studying at Curry College).
2. The term **“Faculty”** shall mean all persons employed full-time and/or part-time by Curry College to teach subjects matter, as defined in the Curry College-Curry College Chapter AAUP Agreement (Collective Bargaining Agreement).
3. The term **“Staff”** shall mean all employees and all persons performing any work directly for Curry College, whether, full-time, part-time, part-time casual, temporary, exempt, non-exempt, intern/internship, or volunteer. The staff of third-party vendors, who appear on Curry College’s campuses on a weekly basis or more frequently, including Sodexo, McGarr, and Follett, are subject to all requirements applicable to Staff under this Policy. Nothing in this Policy creates an employment relationship with Curry College for staff of vendors.
4. The term **“Fully Vaccinated”** shall mean a Student, Faculty member, or Staff member who has been injected with/received either: two (2) shots of Pfizer-BioNtech or Moderna, or one (1) shot of the Johnson & Johnson (Janssen) COVID-19 vaccine, and for whom at least 14 days have elapsed since the date of their required dose of the vaccine and who has received a completed COVID-19 Vaccination Record Card (“Vaccination Card”), a small white card completed by the health care provider who administered the shots. Information can be found at <https://www.fda.gov/emergency-preparedness-and-response/coronavirus-disease-2019-covid-19/covid-19-vaccines> and at <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/different-vaccines.html>. For international Students, Faculty, and Staff, who do not have access to the Pfizer-BioNtech, Moderna, or Johnson & Johnson (Janssen) COVID-19 vaccines, until further

notice, Curry College will treat as “Fully Vaccinated” those who have received one of the other vaccines presently authorized for emergency use by the World Health Organization (“WHO”)—authorization is subject to change by WHO—in the required dose(s) and also had their final dose several weeks earlier. Covaxin and Sputnik V are not WHO approved vaccines. Information can be found at <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/covid-19-vaccines/advice> and at <https://covid19.trackvaccines.org/agency/who/>.

For all persons vaccinated with authorized vaccines, booster shots may be required in the future per guidance of CDC, United States Food and Drug Administration (“FDA”), federal and state departments of health, and/or WHO; accordingly, the definition of “Fully Vaccinated” may then be expanded to encompass booster doses of vaccine.

5. Currently and until further notice, Curry College is a closed campus (Milton and Plymouth campuses). All Visitors and Vendors not subject to the requirements of “Staff” as defined in Paragraph 3, above, will be required to follow all current Curry College safety processes and procedures in effect to be admitted to campus, including being sponsored or hosted on campus by a particular department of Curry College and submitting a completed screening questionnaire (available on-line and/or through the department to be visited).

## **II. Rationale for this Policy**

The leadership team of Curry College has reviewed recommendations concerning mandatory COVID-19 vaccinations. The Centers for Disease Control and Prevention (“CDC”) has recommended COVID-19 vaccinations as a primary way of reducing the risk of transmission. “Vaccination is the leading prevention strategy to protect individuals from COVID-19 disease and end the COVID-19 pandemic. Current COVID-19 vaccines authorized for use in the United States are safe and effective, widely accessible in the U.S., and available at no cost to all people living in the U.S.” ( CDC, Guidance for Institutions of Higher Education (IHEs), content source, National Center for Immunization and Respiratory Diseases (NCIRD), Division of Viral Diseases, updated June 4, 2021, available at <https://www.cdc.gov/coronavirus/2019-ncov/community/colleges-universities/considerations.html> ).

The new COVID-19 vaccines have been evaluated in tens of thousands of individuals who volunteered to be vaccinated and participate in clinical trials. The information from these clinical trials allowed the U.S. Food and Drug Administration (FDA) to determine the safety and effectiveness of the vaccines. These clinical trials were conducted according to rigorous standards set forth by the FDA. The FDA has determined that the newly authorized COVID-19 vaccines meet its safety and effectiveness standards.

Thank you for your commitment to this very important issue.

## **III. What is Required**

We require all Students, absent an approved exemption, to be fully vaccinated no later than 14 days prior to their return to campus (return dates vary for some Students , e.g., Resident Assistants and some Student athletes will be returning on or about August 15, 2021, while most Students arrive back by the beginning of the 2021-2022 school year on August 27, 2021).

All Faculty and Staff are required, absent an approved exemption, to be fully vaccinated no later than August 27, 2021, the start of the 2021-2022 school year.

If you are not already vaccinated or scheduled to be vaccinated, we are requiring our Students, Faculty, and Staff to make appointments for vaccination at an approved vaccination site or vaccination provider as soon as possible to become fully vaccinated prior to the above deadlines.

International Students may face different conditions for being vaccinated in their home country, some without the ability to receive a WHO-approved vaccine. Such students should make arrangements for visa, travel, lodging, and medical assistance to get the vaccine when they arrive in the United States consistent with the deadlines set out above, if such international Student(s) has/have not already been fully vaccinated before arrival.

The following resources may be available to assist you in scheduling a vaccination or locating a vaccination site or provider:

1. For Massachusetts residents: [vaxfinder.mass.gov](https://vaxfinder.mass.gov) or [MaCovidVaccines.com](https://www.mavaccines.com);
2. For residents of other states: <https://www.vaccines.gov/>; and,
3. For International Students: <https://www.who.int/>.

#### **IV. Process of Reporting**

A Student, Faculty member, or Staff member who has received either: two (2) shots of Pfizer-BioNtech or Moderna, or one (1) shot of the Johnson & Johnson (Janssen) COVID-19 vaccination will have received a completed COVID-19 Vaccination Record Card (“Vaccination Card”), a small white card completed by the health care provider who administered the shots. If you have lost your COVID-19 Vaccination Record Card, you should contact the medical office or provider where you received your vaccination and ask for a replacement card immediately as this is an important medical record.

Student, Faculty, and Staff members are required to follow the process of reporting their vaccination as set out in this section.

**The easiest means of meeting the obligation to report one’s vaccination status is through the CoVerified application.** COVID-19 vaccination record information must be entered into the CoVerified application. Additionally, one must upload into the CoVerified application a photograph/digital image of one’s vaccination card. [Instructions for how to upload your vaccination status may be found here.](#)

If the CoVerified application is not operational and/or not being utilized at Curry College, or the Student, Faculty, or Staff member does not have access to a working, active CoVerified application, a Student, Faculty, or Staff member is required to submit such confidential

vaccination information and copy of vaccination card to either Health Services (Student) or Human Resources (Faculty and Staff) and follow these steps to report vaccination status to Curry College:

- 1. Students who are fully vaccinated are required to provide proof of COVID-19 vaccination to Health Services.** Once a Student has a completed Vaccination Card, the Student is to make a copy of the vaccination card and submit the copy (NOT the original) to Health Services, which will maintain this copy of the Student's Vaccination Card in a confidential medical file. Only the supervisor of Health Services and designated Health Services personnel will have access to this medical file, and it will be maintained in a locked file cabinet. Health Services will make a notation in the College's confidential database that the Student has been fully vaccinated against COVID-19 and note the date the Student has been fully vaccinated. Health Services will communicate to the Vice President of Student Affairs that the Student has been fully vaccinated.
- 2. Faculty and Staff members who are fully vaccinated are required to submit proof of COVID-19 vaccination to Human Resources.** Once a Faculty or Staff member has a completed Vaccination Card, the member is to make a copy of the vaccination card and submit the copy (NOT the original) to Human Resources. Human Resources will maintain this copy of the member's Vaccination Card in a confidential medical file separate from your personnel file. Only certain personnel will have access to this medical file, and it will be maintained in a locked file cabinet. Human Resources will make a notation in the College's confidential database that the Faculty or Staff member has been fully vaccinated against COVID-19 and note the date the member has been fully vaccinated. Human Resources will communicate to the Faculty or Staff member's manager that the person has been fully vaccinated.

#### **V. Request for Exemption for Medical/Disability or Religious Reason or Accommodation**

The College hereby notifies all Students, Faculty, and Staff that it will consider all requests for exemptions and/or reasonable accommodations based on (1) disability or medical issues contraindicating vaccination, including written medical opinion and direction of their personal primary care physician for the exemption or accommodation sought, and (2) sincere religious belief. Such requests for exemptions and/or accommodations will be assessed on an individualized basis, including any undue hardship posed to the College by granting such exemption or accommodation. Curry College will not discriminate or retaliate against anyone in genuine need of an exemption or accommodation.

Curry College's policy is motivated to bring about a safe college community. The Massachusetts Department of Public Health recognizes vaccination waivers in other circumstances, which gives some guidance to Curry College in developing this mandatory COVID-19 Vaccination Policy with medical/disability or religious exemptions.

The Massachusetts Department of Public Health, Immunization Division states in its publication on school vaccinations titled “Massachusetts School Immunization Requirements 2021-2022” (effective on May 26, 2021), in the section labeled “College (Postsecondary Institutions)\*\*+”, relating to vaccinations for Tdap, Hepatitis B, MMR, Varicella, and Meningococcal: “+Medical exemptions (statement from a physician stating that a vaccine is medically contraindicated for a student) must be renewed annually at the start of the school year and religious exemptions (statement from a student, or parent/guardian if the student is <18 years of age, stating that a vaccine is against sincerely held religious beliefs) should be renewed annually at the start of the school year.” (Available at <https://www.mass.gov/doc/immunization-requirements-for-school-entry-0/download>). While this relates to different vaccines than the COVID-19 Vaccine being mandated herein, it does illustrate that waiver of policy provisions due to medical/disability or religious exemptions may be appropriate under certain circumstances.

If you are a **Student** and are unable to receive the vaccine due to a medical/disability reason or a religious reason, please submit a [Request for Exemption Form](#) to Health Services.

If you are a member of the **Faculty or Staff** and are unable to receive the vaccine due to a medical/disability reason or a religious reason, please submit a [Request for Exemption Form](#) to Human Resources.

The respective electronic exemption request forms for Students and for Faculty and Staff will be distributed to all with an electronic copy of this policy, and the forms will also be available on the myCurry Portal.

For any individual, Student, Faculty, or Staff, who has had SARS-CoV-2 infection and according to the written advice and direction of the person’s primary care physician is unlikely to benefit from COVID-19 vaccination, such person should present a medical request for waiver of the vaccination requirement (Student submits to Health Services and Faculty or Staff submits to Human Resources).

## **VI. Current COVID-19 Exposure or Illness**

Individuals with current COVID-19 infection will have vaccination deferred until recovery from acute illness and the criteria has been met to discontinue isolation. Individuals who have a current known COVID-19 exposure must defer vaccination until their quarantine period has ended to avoid exposing others during the vaccination visit.

Students should report COVID-19 symptoms, exposures, and hazards to Health Services within 24 hours of becoming aware of the potential symptoms, exposures, or hazards.

Faculty should report COVID-19 symptoms, exposures, and hazards to the Academic Affairs Office within 24 hours of becoming aware of the potential symptoms, exposures, or hazards.

Staff should report COVID-19 symptoms, exposures, and hazards to their respective supervisors within 24 hours of becoming aware of the potential symptoms, exposures, or hazards.

No Student, Faculty, or Staff member will be subject to any form of reprisal for a required deferral or for reporting symptoms, exposures, or hazards.

In addition to the requirements of the foregoing paragraph, as long as the Symptom Tracker in the CoVerified application is operational and utilized at Curry College, Students, Faculty, and Staff may also be also required to report such symptoms in the CoVerified application.

## **VII. Confidentiality**

**The College maintains the confidentiality of all information and documentation related to COVID-19 vaccinations, medical treatment and conditions, and all exemption requests.** All such confidential information will be kept in individual Confidential Student Medical Files or Confidential Employee Medical Files. **Confidential information is only used and disclosed to those who need to know the information or possess it to perform a job-related function for the College, as described below:**

1. The Director of Health Services and limited designees (approximately +/- 5 people) will have access to the **Student vaccination information** and will communicate to the Vice President of Student Affairs the names of those Students (1) who have been fully vaccinated, and (2) those Students who are required to continue to wear masks indoors in Curry College facilities and/or engage in other safety precautions until further notice. The Vice President of Student Affairs may communicate to appropriate Curry College Department Heads and/or their designees, including the Provost and Academic Affairs, with **need-to-know information** as to Students, the names of Students who will be required to wear masks indoors for educational activities, use of school facilities, and other school activities to ensure individual Students who are required to wear masks or follow other safety procedures do so.
2. The Vice President of Human Resources and limited designees (approximately +/- 5 people) will have access to **Faculty and Staff vaccination information** and will communicate to the respective Supervisors of Faculty and Staff the names of those Faculty or Staff members who are required to continue to wear masks indoors in Curry College facilities and/or engage in other safety precautions until further notice. This information will be supplied to supervisors and/or other authorized persons with such **need-to-know information** to help ensure the individual wears a mask during indoor educational/academic activities or indoor work activities.

Nothing in this section changes the rights, duties, and responsibilities of Curry College's authorized administrators of/to the CoVerified application system and their authorized access to confidential information contained/held therein.

## **VIII. Safety Rules Applicable to Students, Faculty, and Staff who are not Vaccinated**

Following guidance from the CDC in June 2021 and in order to off-set the risk to co-workers, students, and visitors to Curry College, those Students, Faculty, and Staff who are **not fully vaccinated**, including those persons who have received an exemption from the Vaccination

Policy, must continue to engage in Curry College’s existing COVID-19 Safety Protocols (and as may be amended from time to time), including without limitation: masking, social distancing, surveillance or prevalence testing, isolating when positive for COVID-19 or quarantining when exposed to COVID-19 per CDC or Curry College protocols, etc.

The College will continue to monitor guidance from the CDC, Mass. Department of Public Health, Occupational Safety and Health Administration and other federal, state, and local government authorities to determine if and when the preventative and safety measures for those that are not vaccinated and participating in campus life and the workplace might be modified.

Persons who are fully vaccinated are not subject to the provisions of this policy section.

**IX. Applicants for Employment**

As of June 14, 2021, all job offers will be made on a conditional basis pending proof of COVID-19 Vaccination in accordance with the terms of this Policy.

**X. Separation of Student from Curry College**

In the event that a Student refuses to be vaccinated against COVID-19 and does not receive an exemption for this policy, the College may, after a thorough assessment of the individual’s situation, have to terminate that Student’s enrollment with the College.

**XI. Separation from Employment**

In the event that an employee refuses to be vaccinated against COVID-19 and does not receive an exemption for this policy, the College may, after a thorough assessment of the individual’s situation, have to terminate that employee’s employment with the College and/or seek termination through any relevant provisions of any applicable collective bargaining agreement.

**XII. Retaliation is Prohibited**

Discrimination and Retaliation are prohibited at Curry College.

Those persons who have received an exemption from COVID-19 Vaccine requirements under this policy may be members of a protected class or otherwise may have exercised rights under federal and state laws; accordingly, such persons are to be free of discrimination and retaliation in the workplace and the academy.

An employment supervisor for employees or teaching professionals for students will be made aware of persons who are subject to continuing safety protocols, e.g., masking, in order to ensure compliance of such safety measures. The College intends to have the smallest group of persons possible with **need-to-know information** of exemptions granted and/or unvaccinated status of persons subject to this policy to effectuate the College’s safety protocols to reduce transmission of COVID-19 in our college community. It is impermissible to ask why a person is subject to continuing masking requirements or other safety measures except by those persons identified in Section VII, Confidentiality, above.

There may be people who choose to continue to wear masks and/or distance from others for personal safety, illness, or allergies. Assumptions and speculation as to why a person is wearing

a mask should not be made; moreover, such matters should not be the subject of discussion or comment in the workplace or in the academy. **See Section VII, Confidentiality, above.**

Treating Students, Faculty, and Staff differently because they wear a mask or may be labelled as not having taken the COVID-19 Vaccine may be viewed by the College as discriminatory conduct and/or retaliatory conduct subject to discipline under workplace and academy rules, including applicable collective bargaining agreements.

### **XIII. Notice of Curry College’s Right to Modify Vaccination Policy**

COVID-19 has created challenges for all of us. News of developments in science and medicine regarding COVID-19 and variants is frequently occurring and being updated. Accordingly, Curry College reserves the right to update or modify this Mandatory COVID-19 Vaccination Policy as often as the leadership team of Curry College considers it in the best interests of the safety of our College community and campuses.

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