

# Confederated Tribes of Siletz Indians

## COVID-19 Vaccination Policy

### **(A) PURPOSE**

The Confederated Tribes of Siletz Indians (CTSI) has a duty to provide and maintain an environment that is free of known hazards.

This policy is to safeguard the health of our Tribal members, employees, visitors, and the community at large from infectious diseases, specifically, the Coronavirus Disease 2019 (COVID-19) that may be reduced by vaccinations.

This policy complies with all applicable laws and is based on guidance from the Centers for Disease Control and Prevention (CDC), tribal, state, and local health authorities.

### **(B) DEFINITIONS**

- (1) Fully vaccinated: Defined as having received, at least 14 days prior, either the 2<sup>nd</sup> dose in a two-dose COVID-19 vaccine series or single-dose COVID-19 vaccine. As guidelines are updated from the CDC, this definition may change such as requiring boosters for fully vaccinated individuals.
- (2) CTSI entities:
  - i. Siletz Tribal Administration offices/departments;
  - ii. Tribal Area Offices in Portland, Salem, and Eugene;
  - iii. Chinook Winds Casino;
  - iv. Chinook Winds Hotel;
  - v. Chinook Winds Golf Course;
  - vi. Siletz Tribal Business Corporation;
  - vii. Siletz Tribal Gaming Commission;
  - viii. Tenas Illahee Childcare Center; and
  - ix. The Siletz Community Health Clinic.
- (3) CTSI building and facility: Any building or facility the Tribe owns or rents for use of conducting Tribal business for profit or non-profit. Such buildings include but is not limited to the Administration building, Siletz Community Health Clinic, CTSI TLC homes, Area Offices, etc.
- (4) Public CTSI property: Real property CTSI owns or rents for use of conducting CTSI business where the public and CTSI members have access to as well where employees/contractors are present. Such property includes the Paul Washington Cemetery, CTSI Congregate care facilities, CTSI roads, CTSI I area offices etc.
- (5) CTSI congregate care facilities: The men's and women's Transitional Living Center (TLC Homes) operated by the Siletz Community Health Clinic's Behavioral Health Department.

**(C) WHO MUST BE VACCINATED:**

- (1) Employees of CTSI entities, Tribal Council Members, and residents of CTSI congregate care facilities are required to be fully vaccinated, as defined herein unless an approved reasonable accommodation form is on file.
- (2) Volunteers, contractors, vendors and their employees must wear a medical grade mask when working in or around CTSI buildings

**(D) VACCINATIONS**

- (1) Vaccines must be Food and Drug Administration (FDA) approved; have an emergency use authorization from the FDA; or, for persons fully vaccinated outside the United States, the vaccine must be listed for emergency use by the World Health Organization (WHO).
- (2) CTSI will provide access to the vaccine or work with the individual to identify off site resources for the vaccine.
- (3) The Siletz Community Health Clinic will verify any questionable evidence of vaccination through the Oregon Health Authority (OHA), or other agencies/organizations as needed.

**(E) PROCEDURES**

- (1) Current employees of CTSI entities, CTSI Council Members, and residents of CTSI congregate care facilities must receive a single dose COVID 19 vaccine (Janssendd/Johnson & Johnson) or initial dose of primary vaccination series (Pfizer-BioNTech/Comirnaty or Moderna) by December 6, 2021 and complete the primary vaccination series by January 4, 2022; and provide proof they are fully vaccinated by showing the COVID 19 Vaccination Record Card received from the provider of their vaccination to HR Staff or designated CTSI employee. It can be a digital copy of the COVID 19 Vaccination Record Card provided that the individual's name can be seen in the copy.
- (2) Individuals who have an approved medical accommodation will be required to always wear a medical grade mask while in a Tribal building, facility and outdoors on public CTSI property. They will be subject to, at minimum, weekly molecular or antigen detection testing for any week an individual intends to be present at a Tribal building, facility, outdoors on public CTSI property and/or in congregate care.

Each entity will be responsible for setting up the procedures for individuals to do weekly testing as determined by the needs of the entity and the resources available to complete the tests. Each entity will be responsible for notifying individuals that require weekly testing in writing of the procedure for taking the test and notifying the appropriate staff person of the result. Employees tested at a tribal entity will not be charged for the test by CTSI.

- (3) Employees hired after the adoption of this policy must provide proof of vaccination prior to their first day of employment by showing the COVID 19 Vaccination Record Card received from the provider of their vaccination to the HR Staff or designated CTSI employee. It can be a digital copy of the COVID 19 Vaccination Record Card provided that the individual's name can be seen in the copy.
- (4) A Tribal Council Member who takes office after the adoption of this policy must provide proof of vaccination by showing the COVID 19 Vaccination Record Card from the provider of their vaccination to the CTSI Tribal Council Chairman prior to attending their first in-person Tribal Council meeting.
- (5) Residents entering a CTSI congregate care facility after the adoption of this policy must submit proof of vaccination by showing the COVID 19 Vaccination Record Card from the providers of their vaccination as part of their application to enter the facility.
- (6) All CTSI Entities' Requests for Proposal (RFP) issued after the adoption of this policy will contain a provision requiring each employee assigned to work at a CTSI site to wear a medical grade mask while in or around CTSI buildings as part of the contract requirements.
- (7) CTSI will pay for any out-of-pocket expense for the vaccination required by this policy for employees of any CTSI entity, Tribal Council Members, and CTSI congregate care facility residents as of the adoption date of this policy.
  - (a) When the vaccine is not received in-house, any fees associated with obtaining the vaccination will be run through the individuals' health insurance where applicable and otherwise be submitted for reimbursement.
- (8) Employees of CTSI entities will be paid for time taken to receive vaccinations, boosters and/or testing. For off-site vaccinations, employees are to work with their supervisor to schedule appropriate time to comply with this policy.

**(F) REASONABLE ACCOMMODATION**

- (1) Employees of any CTSI I entity or Tribal Council members in need of a medical exemption from this policy must submit a completed Request for Accommodation form to the appropriate Human Resources Director to begin the interactive accommodation process within 7 (seven) days of the adoption date of the Policy.
- (2) Employees hired after the adoption of this policy or a Tribal Council member who takes office after the adoption of this policy must submit a request for exemption to the appropriate Human Resources Director prior to starting employment or attending their first in-person Tribal Council meeting.
- (3) The Human Resources Director will process the Request for Accommodation with a determination within 7 (seven) business days.
- (3) Reasonable accommodations will only be granted if confirmed in writing by a licensed Medical Provider that the person has a life-threatening allergic reaction to any of the ingredients in the approved vaccinations. Reasonable accommodations may be granted where they do not cause CTSI undue hardship or pose a direct threat to the health and safety of others.
- (4) Residents entering a CTSI congregate care facility in need of a medical exemption from this policy must submit the Request for Accommodation form to the Behavioral Health Program Administrator prior to entering the CTSI congregate care facility. The Behavioral Health Program Administrator will work with designated Administration staff with a determination within 7 (seven) business days.
- (5) The CTSI entity's decision on whether to grant an accommodation is the final decision of CTSI and is not subject to any additional administrative review under any CTSI entities Personnel Policies or Administrative Appeals process.

**(G) FAILURE TO COMPLY**

- (1) Employees who fail to comply with the requirements of this policy will be placed on unpaid leave until compliant.
- (2) Employees who fail to comply with this Policy may face additional corrective action up to, and including, termination of employment.

- (3) Tribal Council Members who fail to comply with the requirements of this policy will be prohibited from entering any CTSI facility or participating in any in person gathering and may be considered in violation of the Tribal Council Ethics Ordinance.
- (4) Contractors and their employees who fail to comply with the requirements of wearing a medical grade mask as outlined in this policy will be prohibited from entering any Tribal building or public Tribal property. The contract may also be terminated by the CTSI for cause.
- (5) Residents in a CTSI congregate care facility who fail to comply with the requirements of this policy will be prohibited from entering the CTSI congregate care facility and must be required to leave the CTSI congregate care facility.

#### **(H) VACCINE AND/OR TESTING SHORTAGE**

- (1) In the event of a COVID-19 vaccine or testing shortage, the Tribe will develop a contingency plan based on CDC guidance for vaccine and testing prioritization and distribution.