

Housing Authority of the City of Los Angeles
COVID-19 Mandatory Vaccination Policy
MPP 108 K

The Housing Authority of the City of Los Angeles (“HACLA”) is committed to providing and maintaining a safe workplace that is free of known hazards. To achieve this goal, HACLA shall mandate vaccination against COVID-19.

I. PURPOSE & APPLICABILITY

- A. Due to the nature of HACLA’s business of providing service to the public, the COVID-19 Mandatory Vaccination Policy (“Policy”) serves to safeguard the health and well-being of the employees and their families, and any Third Party doing business with HACLA from the risks associated with COVID-19.
- B. This Policy applies to all HACLA employees.

II. DEFINITIONS

Definitions used in this Policy include:

- A. **Fully Vaccinated:** 14 or more days must have passed since the employee received either (1) the second dose of a two-dose COVID-19 vaccine series; or (2) a single-dose COVID-19 vaccine. Fully vaccinated includes booster shots approved by the FDA at intervals recommended by the Center for Disease Control. Reasonable time shall be provided to employees to receive boosters as they become available.
- B. **Interactive Process:** The collaborative effort involving an employer and employee to conduct an individualized assessment of both the essential duties and the specific physical or mental limitations of the individual that are directly related to the need for reasonable accommodation.
- C. **Reasonable Accommodation:** Under Title I of the Americans with Disabilities Act (ADA), a reasonable accommodation is a modification or adjustment to a job, the work environment, or the way things are usually done during the hiring process.
- D. **Third Party:** A Third Party is defined as any individual that is not a HACLA employee, who an employee may have contact with during the course of employment. A Third Party may be, but is not limited to one of the following: residents, clients, program participants, vendors, interns, volunteers, applicants and contractors.

III. POLICY

Consistent with its duty to provide and maintain a workplace that is free of recognized hazards, HACLA has adopted this Policy to safeguard the health and well-being of employees and their families, and any Third Party from infectious conditions, specifically COVID-19 that may be mitigated through an effective vaccination program.

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IV. GENERAL PROVISIONS

- A. Effective November 1, 2021, all HACLA employee, except those with an approved medical or religious accommodation, shall be Fully Vaccinated against COVID-19 as a condition of employment, and submit proof of vaccination.
- B. The vaccine shall be approved by the U.S. Food and Drug Administration (FDA) for COVID-19, have an emergency use authorization from the FDA, or, for persons vaccinated outside the United States, be listed for approved or emergency use by the World Health Organization.
- C. Vaccinations may be taken during working hours, and reasonable paid time off will be provided, to the extent needed, for those experiencing side effects from the vaccine that prevent them from performing the duties of their position. Employees who are getting vaccinated during work hours must submit the applicable paid leave request form to Human Resources and coordinate with their supervisors to minimize operational impact.
- D. Employees who are not Fully Vaccinated by October 31, 2021 due to an approved accommodation must undergo COVID-19 testing at least weekly.
- E. Employees who are not Fully Vaccinated by October 31, 2021, and have not been approved for a medical or religious accommodation, will be provided a grace period through November 15, 2021 to become Fully Vaccinated, and must undergo COVID-19 testing at least weekly until Fully Vaccinated.
- F. COVID-19 testing shall be made available at no cost to eligible HACLA employees at one or more HACLA facilities. Time spent testing at a HACLA facility shall be compensable.

V. REASONABLE ACCOMMODATIONS

- A. Exemption from this Policy shall be considered due to a serious medical condition, disability or because of a sincerely held religious belief.
- B. Any employee who has a qualifying medical condition/disability that contraindicates the vaccination, or who objects to being vaccinated on the basis of sincerely held religious beliefs and practices, must notify the Human Resources Department of their intent to request a medical or religious exemption by or before September 27, 2021. HACLA will engage in an interactive process to determine if a reasonable accommodation can be provided. To the extent feasible, determinations regarding approved accommodations will be communicated by or before October 25, 2021.

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- C. Accommodations will be granted where they do not cause HACLAs undue hardship or pose a direct threat to the health and safety of others.
- D. An employee may request an accommodation without fear of retaliation.

VI. VIOLATION OF THE POLICY

Violation of this Policy, including but not limited to submission of falsified documents, will be subject to disciplinary action, including termination in accordance with the Personnel Rules and any applicable Memorandum of Understanding.

VII. PROCEDURES

The President and CEO or designee has the authority to adopt any additional procedures necessary to implement or improve this Policy.

VIII. LEGAL COMPLIANCE

This Policy is intended to comply with all state and local laws. It is based upon guidance provided by the Occupational Safety and Health Administration (OSHA), the Centers for Disease Control and Prevention (CDC) and other public health and licensing authorities, as applicable.

IX. AMENDMENT TO THE POLICY

This Policy may only be amended by the Board of Commissioners, subject to meet and confer requirements pursuant to the Meyers-Milias-Brown Act.