

POLICIES OF THE COLORADO STATE UNIVERSITY SYSTEM
ALL INSTITUTIONS POLICY

Policy Title: COVID-19 Vaccination Requirements	Effective Date: August 9, 2021
Contact: info@csusystem.edu	

POLICY SUMMARY

The Board of Governors of the Colorado State University System, the System, and the Institutions within the Colorado State University System, including CSU Fort Collins, CSU Global, and CSU Pueblo (the “Institutions”) strive to protect the health and safety of those students, faculty, and staff who work, live, or learn in any of the System or Institution’s locations. The Board, System, and the Institutions strongly recommend that all members of the community obtain the COVID-19 vaccine as soon as they are eligible. This policy requires all System and Institution students, faculty, and staff members who access System and Institution facilities in-person to receive the COVID-19 vaccine, subject to certain exceptions and exemptions. Enforcement of this policy and its requirements will be delayed until full FDA licensure (approval) and widespread accessibility of at least one approved vaccine or public health officials implement vaccine requirements. Those who do not receive a vaccine may be subject to additional safety measures in the event of an outbreak, in accordance with the direction of state and county public health officials. The Institutions are directed to adopt their own COVID-19 vaccination policies, procedures, or guidelines that are consistent with this policy.

PURPOSE OF THIS POLICY

As stated in the Board’s Public Health Emergency Response Policy, Colorado law vests the supervision and control of the System and the Institutions in the Board of Governors, and this System Policy sets forth additional rules and regulations for the health, safety, and welfare of students, faculty, and staff. This policy helps fulfill the Board, System, and Institutions’ responsibilities to manage and respond to the COVID-19 public health emergency. Medical and scientific data strongly support the use of vaccinations to prevent serious illness and death. Consistent with the Colorado Department of Public Health and Environment, the Board, System, and the Institutions strongly support vaccination in general as one of the easiest and most effective tools in preventing diseases that can cause serious illness or death.

In addition, for the control of infectious diseases on a university campus, the Board, System and Institutions follow the public health guidelines of the U.S. Centers for Disease Control and Prevention (“CDC”), the Colorado Department of Public Health and Environment, the

Larimer County Department of Health and Environment, the City and County of Denver Public Health and Environment, and the Pueblo Department of Health and Environment, as applicable. Throughout the COVID-19 pandemic, the Board, System, and the Institutions have carefully followed public health guidelines and mandates regarding testing, physical distancing, masking, cleaning, isolation, and quarantine. The availability of vaccines against COVID-19 offers the opportunity to help end the pandemic and return our facilities and campuses to an in-person, inclusive learning and work environment.

The requirement for all System and Institution employees and students to receive vaccination against COVID-19 is intended to meet important public health objectives, such as (a) increasing herd immunity, (b) decreasing the spread of COVID-19 and its potential serious health consequences, (c) protecting vulnerable employees and students, (d) protecting families and other contacts and local communities, (e) allowing a robust return of employees and students to campus and facilities and in-person learning, and (f) to help prevent future interruptions due to outbreaks.

APPLICATION OF THIS POLICY

This policy applies to all System and Institution employees and students who will be physically present at any System or Institution facility, such as classrooms, laboratories, residence halls, offices, or other System or Institution buildings. This policy applies to all employees, such as faculty and staff, regardless of appointment type. Implementation and enforcement of this policy and its requirements is delayed until full FDA approval (licensure) and widespread accessibility of at least one approved vaccine. Timing for implementation of this policy's COVID-19 vaccine requirements will depend upon FDA approval and the availability of vaccine from suppliers. As a general matter, the vaccine requirement will be effective on August 1, 2021, or when at least one COVID-19 vaccine is fully licensed by the FDA and available to anyone who wants it, whichever happens later. In addition, with the Chancellor's prior approval, this policy's COVID-19 requirements may be implemented by an Institution before full FDA approval (licensure) if local public health officials impose or recommend a COVID-19 vaccination requirement.

EXEMPTIONS FROM THE REQUIREMENTS OF THIS POLICY

This policy follows those vaccination exemptions that are established under Colorado law, including an exemption based on a medical condition, or a religious belief or personal belief that is opposed to immunizations, as described in more detail below.

POLICY STATEMENT

This policy is meant to supplement those emergency response and public health policies, procedures, and guidelines at the System and the Institutions. It does not replace existing policies requiring persons to observe certain COVID-19 related requirements, such as the

appropriate use of personal protective equipment, face coverings, social and physical distancing, handwashing, cleaning, and testing.

POLICY PROVISIONS

COVID-19 Vaccination is Required Unless an Exemption Applies

All System and Institution students and employees who access System and Institution facilities in-person are required to be fully vaccinated by receiving a COVID-19 vaccine, subject to the Exemptions provided in this policy. Enforcement of this COVID-19 vaccination requirement will be delayed until full FDA licensure (approval) and widespread accessibility of at least one approved vaccine. Alternatively, with the Chancellor's prior approval, this policy's COVID-19 requirements may be implemented by an Institution before full FDA approval (licensure) if local public health officials impose or recommend a COVID-19 vaccination requirement.

The U.S. Food and Drug Administration ("FDA") issued emergency use authorization ("EUA") for the Pfizer-BioNTech COVID-19 vaccine, the ModernaTX, Inc. COVID-19 vaccine, and the Janssen Biotech Inc./Johnson & Johnson COVID-19 vaccine. We anticipate that one or more such COVID-19 vaccines with EUA status will be fully approved and will be considered "approved" under this policy when the FDA issues a license for the vaccine, and the CDC has recommended its administration.

Being "fully vaccinated" means having received two doses of Pfizer or Moderna vaccine, plus two weeks, or having received one dose of the Janssen/Johnson & Johnson vaccine, plus two weeks, as well as having received any "booster" or supplemental vaccination doses as recommended by the Advisory Committee on Immunization Practices (ACIP).

Exceptions to COVID-19 Vaccination

System and Institution employees and students who do not physically access System or Institution facilities are not required to be fully vaccinated against COVID-19. System and Institution employees and students who physically access System or Institution facilities are not required to be fully vaccinated by receiving a COVID-19 vaccine if they notify the appropriate System or Institution personnel of the applicability of one of the following exemptions:

- (a) the COVID-19 vaccine would endanger an employee or student's life or health or is medically contraindicated due to another medical condition;
- (b) the employee or student adheres to a religious belief whose teachings are opposed to immunization; or
- (c) the employee or student has a personal belief that is opposed to immunization.

Those employees and students who qualify for an exemption may be required to follow additional public health requirements or precautions, such as isolation, quarantine, testing,

or other measures, particularly if there is a COVID-19 outbreak, in accordance with the direction and guidance of public health officials.

Where an exemption from COVID-19 vaccination necessitates an accommodation for a disability or medical condition, or an accommodation based on a religious or personal belief or practice, the appropriate System or Institution will engage in an interactive process with the employee or student to determine which reasonable accommodations may be available.

This policy is primarily designed to facilitate a return to in-person learning within classrooms, laboratories and other such buildings, and access for students and staff to the full benefits and use of Institutional facilities and indoor meeting spaces. It does not apply to visitors to a campus who are solely accessing public spaces such as outdoor and event spaces. Visitors accessing indoor venues may be required to take other public health precautions, such as wearing a mask.

Proof of COVID-19 Vaccination or an Exemption

The Institutions may determine the most appropriate method of confirming compliance with the vaccination requirements of this policy and the related policy, procedures or guidelines at the Institution, and the methods of demonstrating compliance for students may be different than those for employees. The System will provide additional guidelines to System employees about compliance with this policy.

Failure to Comply

Compliance with this policy is required and the System and the Institutions may take appropriate action in response to non-compliance, including but not limited to prohibiting access to System or Institution facilities, programs, or events, as appropriate.

Institution Policies

The Institutions are directed to promptly adopt their own COVID-19 vaccination policies, procedures, or guidelines that are consistent with this policy. Each Institution should implement strategies for COVID-19 vaccine access, as appropriate.

APPROVALS

COLORADO STATE UNIVERSITY SYSTEM

By: _____/s/_____
Anthony A. Frank, Chancellor

LEGAL REVIEW

_____/s/_____
Jason L. Johnson, General Counsel