

COVID-19 VACCINATION AND TESTING Compliance Checklist

Stay ahead of the OSHA Emergency Temporary Standard (ETS), which will apply to most businesses with 100 or more employees starting January 4.

- Mandatory vaccination or vaccine-or-testing:** Determine whether you will mandate vaccination for all employees or allow unvaccinated employees to continue to work while wearing masks and undergoing weekly testing. Consider current vaccination rates, the nature of your workplace, worker shortages and other safeguards you may have in place.
- Policy development:** Establish a clear policy around your selected approach—vaccination required or testing and masks for unvaccinated workers.
- Vaccination status:** Determine each employee’s vaccination status and maintain records, rosters and proof of vaccination.
- Time off for vaccination:** Provide up to four hours of paid time to receive each primary vaccination dose. In addition, provide paid sick leave to recover from any side effects.
- Testing of unvaccinated workers:** Ensure that employees who are not fully vaccinated are tested at least weekly when in the workplace, beginning January 4.
- Positive results:** Employees must be required to promptly provide notice when they test positive for or are diagnosed with COVID-19. Regardless of vaccination status, they must be removed immediately and cannot come back to the workplace until return-to-work criteria are met.
- Face masks:** Ensure that employees who are not fully vaccinated wear face coverings when indoors or sharing vehicles.
- Employee education:** Provide easy-to-understand information about the OSHA requirements, vaccine efficacy and safety, and the benefits of being vaccinated. In addition, employees must understand that they are protected against discrimination and retaliation, and that there are penalties for false information. The CDC regularly updates its page, [Key Things to Know About COVID-19 Vaccines](#), with shareable information.
- Reporting:** Report work-related COVID-19 fatalities and inpatient hospitalizations to OSHA within 8 and 24 hours, respectively.
- Records:** Allow employees and their authorized representatives access to certain records.

Get trusted advice from Creative Workforce Solutions

From determining who is responsible for the costs of testing to ensuring that your policies are fair and practicable, Creative Workforce Solutions will help you get it right. Look to us for a full suite of services, including:

- Compliance consulting and perspectives
- Policy development support
- Management and workforce training
- Anti-discrimination consulting

Contact [Loretta Vitale](#), Health and Safety Consultant at Creative Workforce Solutions to talk about what you need.

[Read the OSHA COVID-19 Vaccination and Testing ETS Fact Sheet](#), including workplaces covered by other guidelines and greater detail regarding the requirements.