

COVID-19 Vaccine Policy Checklist for Employers

According to a recent Paychex survey,* 44% of medium-sized businesses (50-500 employees) and 36% of small businesses (10-49 employees) say that COVID-19 vaccine developments are prompting them to plan for a return to the workplace.

Whether you are just starting to plan your return to the office, or have been back at the workplace for a while, now is the time to consider whether your business will implement a COVID-19 vaccine policy on your road back to normalcy.

If you have decided to implement a COVID-19 vaccination policy, use the following checklist to help you get started on developing your policy, today.

- Determine whether vaccination will be mandatory or voluntary for your employees.**

While employers may be able to develop mandatory vaccination policies that comply with federal requirements, mandating vaccination will likely involve legally complex issues. Rather than mandating vaccination, you may instead decide to encourage, but not mandate, COVID-19 vaccinations. Visit our [FAQ](#) page for more information regarding legal considerations surrounding mandatory vaccine policies.
- Review your state's COVID-19 vaccine distribution plan.**

How the COVID-19 vaccine is distributed varies by state. These plans are still in development and are likely to evolve over time, so be sure to review your state plans with your counsel before developing a vaccination policy, and often throughout the vaccination process. Find links to each state distribution plan [here](#).
- Identify a point person or task force to manage your vaccination program.**

If you decide to implement a COVID-19 vaccination policy, you'll need someone to develop and manage your vaccination program, and be available to answer any employee questions regarding your policy, or vaccination in general.
- Develop a written vaccination policy.**

If you plan to encourage, incentivize, and/or mandate COVID-19 vaccination, you should consider adopting a written policy to document your guidelines, requirements, and processes, and to help keep your vaccination efforts organized. Your policy should address:

 - Whether or not vaccination is voluntary or mandatory (consider federal, state and local laws and guidelines).
 - How you will handle employee requests for immunization exemptions, if requiring vaccination.
 - How you will provide reasonable accommodations to employees who exempt from vaccination (if you are implementing a mandatory vaccination policy).
 - How you will encourage, or incentivize, employees to get vaccinated (if you plan on encouraging vaccination).

- Who the point person will be regarding all COVID-19 vaccine-related questions.
- How you plan to communicate your policy with employees.
- Whether you will be tracking COVID-19 vaccination status and, if so, how you plan to track it. (Reminder: Tracking, collecting and storing sensitive employee data must be done so in compliance with the Health Insurance Portability and Accountability Act.)
- How vaccine costs will be covered.
- What employees can expect, post-vaccination (Here you may wish to reiterate Occupational Safety and Health Administration requirements and guidelines from the Centers for Disease Control and Prevention regarding COVID-19 in the workplace).
- Review your policy with your legal counsel.**
Before you begin implementing your policy, review it with your legal counsel to be sure you're in compliance with federal, state and local laws and regulations, and to minimize your risk of any potential employee retaliation.
- Communicate your policy with employees.**
Begin implementing your policy by following the communication plan outlined within it. You may wish to lead with an authentic message that reinforces your business commitment to employee health and safety. You may also wish to direct employees to government websites or other resources where they can go to learn more about COVID-19 vaccination.

Looking for additional guidance on developing and implementing a vaccination policy? Paychex is here to help.

Visit www.paychex.com/human-resources to learn more about our suite of HR Services and HCM solutions.

And, visit our [COVID-19 Help Center](#) for the latest information on laws, regulations and guidelines surrounding COVID-19, as well as financial relief, and more.

* Paychex conducted an online survey of 300 principals of U.S. companies with 2 to 500 employees. The survey was fielded January 27-February 2, 2021.