



Rhode Island Office of the  
Postsecondary Commissioner

Shannon W. Gilkey, EdD, Commissioner

TO: Frank Sánchez, President, Rhode Island College  
Meghan Hughes, President, Community College of Rhode Island

FROM: Shannon W. Gilkey, Commissioner of Postsecondary Education

DATE: January 18, 2022

RE: Council Policy on Covid-19 Vaccinations for Non-Classified Employees (P-19)

At its meeting on January 12, 2022, the Council approved the attached amendment to its COVID-19 Vaccination of Council Non-Classified Employees Policy. This amendment modifies the Council's Policy to require a booster shot in addition to the Covid-19 vaccination for all Council faculty and non-classified employees at the Office of the Postsecondary Commissioner, its Centers, Rhode Island College, and the Community College of Rhode Island, which was required when the Council approved the Policy in September, 2021.

As you finalize your plans for implementation, we ask that you share those with this office. In addition, we ask that you share an update regarding your progress in the implementation of this amended policy with this Office and provide an update to the Council as part of your president's report at the next scheduled CPE meeting.

COVID-19 VACCINATION of Council Non-Classified Employees  
Rhode Island Council on Postsecondary Education

Adopted: 09/15/21 (CPE)

Amendment Adopted: 1/12/22 (CPE)

#### POLICY

The Rhode Island Council on Postsecondary Education recognizes the toll that the COVID-19 pandemic has had on the country, the states, and the Rhode Island public institutions of postsecondary education. Now that vaccines and booster shots for COVID-19 are available to the citizens of this state and throughout the country, there is ample opportunity for everyone to be vaccinated and to receive a booster shot, when eligible.

The public institutions for postsecondary education have transitioned back to in-person learning and on-campus student activity, and a return to normalcy, and are now attempting to address the rise in COVID-19 cases due to variants such as Delta and Omicron. Our efforts must continue to focus on offering students, faculty, and staff a safe in-person college experience and workplace. To that end, the Council's faculty and Non-Classified Employees (including internal payroll employees) at the Office of the Postsecondary Commissioner and its Centers, Rhode Island College, and the Community College of Rhode Island will be required to be fully vaccinated and have received a booster shot, if eligible, by January 18, 2022, subject to approved medical exemptions or religious accommodations, and/or receive their booster shot within four weeks from the date they become eligible. Individuals are presently eligible for a booster five months after their initial Pfizer-BioNTech or Moderna two-shot series, or two months after the single-shot Johnson & Johnson vaccine.<sup>1</sup>

The three approved vaccines and the booster shots have been deemed safe by the FDA, are widely available, and both the CDC and the Rhode Island Department of Health are recommending that individuals get vaccinated against COVID-19 and receive a booster shot when they are eligible to do so.

In addition, since there are state Classified Employees who work at the Office and at the Colleges, we call on and strongly encouraged them to also get vaccinated and receive a booster shot as soon as they are eligible.

#### PRACTICES

The Council's faculty and full and part-time Non-Classified Employees (including internal payroll employees) at the Office of the Postsecondary Commissioner and its Centers, Rhode Island College, and the Community College of Rhode Island shall be required to be fully vaccinated for COVID-19 and have received a booster shot, when eligible, pursuant to Rhode Island Department of Health protocols and requirements, on or before January 18, 2022, subject to approved medical exemptions or religious accommodations and/or receive their booster shot within four weeks from the date they become eligible; and they must upload their proof of vaccination and booster shot documentation pursuant to the process established for same at the Office and the Colleges by January 18, 2022 and/or within four weeks from the date they become eligible.

Exemptions for medical conditions or sincerely held religious beliefs will be recognized in accordance with the EEOC guidance, and must be requested pursuant to the applicable procedures, practices, and requirements for same at the Office and the Colleges. Exemptions must be requested in writing by completing a Medical Immunization Exemption Certificate or Religious Immunization Exemption Certificate. The deadline for requesting an exemption for vaccination was October 15, 2021, and the deadline to request an exemption for the booster shot is January 14, 2022. If additional time is needed to provide supporting documentation an extension may be requested, but documentation must be supplied prior to the January 18, 2022 deadline.

Faculty and Non-Classified Employees granted exemptions or who are only partially vaccinated or who have yet not received a booster shot must be tested regularly in accordance with OPC and the Colleges' COVID-19 testing protocols, and must provide test results to the OPC or the Colleges', as per the Office's or Colleges' protocols.

Faculty and Non-classified Employees may apply for a medical exemption for a COVID-19 vaccination and/or

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<sup>1</sup> These time periods are based upon current CDC recommendations and are therefore subject to change in the future.

booster shot for the following reasons:

- Severe allergic reaction (e.g., anaphylaxis) after previous dose or to a component of the vaccine;
- Immediate allergic reaction of any severity after a previous dose or known (diagnosed) allergy to a component of the vaccine;
- History of myocarditis or pericarditis after a first dose of an mRNA COVID-19 vaccine;
- History of myocarditis or pericarditis unrelated to mRNA COVID-19 vaccination;
- Monoclonal Antibody Treatment (MABS) prior to 90 days of January 18, 2022 (the faculty member or Non-Classified Employee should get vaccinated no later than 91 to 120 days after MABS)
- Faculty and Non-Classified Employees out of work on long term medical leave, or medical documentation from a treating provider indicating need for exemption

Faculty and Non-Classified Employees at the Office and the Colleges who have approved medical exemptions or religious accommodations, or who are only partially vaccinated, or who have not yet received a booster shot, are required to be tested in accordance with existing protocols, with negative results, to be able to enter the Office and its Centers, and buildings at the Colleges.

If an application for an exemption is denied, the faculty member or Non-Classified Employee will have fourteen (14) days from notice of denial to receive either a single dose vaccine or the first of a two-dose vaccine or a booster shot, as applicable.

Noncompliance with this vaccination policy may result in the imposition of discipline pursuant to the process set out in applicable collective bargaining agreements or Council policy.

The Council requests that the Office and the Colleges take immediate steps to provide proper notification to their faculty and full and part-time Non-Classified Employees of this policy and the institutions' specific additional procedures, practices, and requirements. The Office and the Colleges shall also provide their faculty and Non-Classified Employees with a contact person(s) and/or office(s) for questions and technical assistance regarding this Council policy and procedures.

It is also acknowledged that this Council policy, and the policies and practices at the Colleges, may need to be amended based upon future developments regarding the status of the COVID-19 pandemic within the state and elsewhere. To that end, the Commissioner of Postsecondary Education is hereby authorized to modify and/or amend this policy as may be necessary to address future developments and conditions regarding COVID-19 at the Colleges, within the state, and elsewhere

Faculty and Non-Classified Employees (including internal payroll employees) at the Office and the Colleges should refer to their appropriate human resource personnel and follow subsequent communications to ensure that this policy is understood and followed.

This policy, as amended, will take effect upon its adoption by the Council.