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**INTEROFFICE MEMORANDUM**

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**TO:** ALL EXECUTIVE DIRECTORS  
**FROM:** LAURA HOLMES, VICE PRESIDENT ORGANIZATIONAL DEVELOPMENT  
MARCIA WERBER-FELDMAN, VICE PRESIDENT RESIDENT SERVICES  
**SUBJECT:** COVID-19 VACCINATION POLICY  
**DATE:** AUGUST 10, 2021

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Consistent with its duty to provide and maintain a workplace and Assisted Living Communities that are free of recognized hazards, HallKeen Assisted Living Communities (“Company”) has adopted this policy to safeguard the health and well-being of employees and their families, our residents and visitors, others who spend time in our facilities, and the community from the risks associated with COVID-19.

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.

This policy applies to all HallKeen Assisted Living employees. It does not apply to residents and visitors. The policy applies to COVID-19 vaccinations that are available to our employees.

**COVID-19 Vaccination Policy**

By either September 5, 2021, or sooner to comply with Federal, State, or local mandates issued the Company will expect all employees to either (a) \*establish that they have received the first vaccination dose or (b) obtain an approved exemption as an accommodation. The process for seeking an accommodation is explained below. For purposes of this policy, an employee is considered fully vaccinated two weeks after receiving the second dose of a two-dose vaccine (Pfizer or Moderna) or one dose of a single-dose vaccination (Janssen). Employees who do not fulfill one of these two requirements will be placed on unpaid leave and their employment will be subject to termination. To establish that they are fully vaccinated, employees may present a completed COVID19 Vaccination Record Card for inspection by an authorized Company representative. The Company will treat all such information as confidential. To facilitate employees’ ability to receive the vaccination, the Company will consider timely requests for appropriate schedule changes. In accord with its time-keeping policies, the Company will also pay non-exempt employees for time spent receiving the vaccination. Additionally, the Company will reimburse employees for the cost, if any, of receiving the vaccination, contingent upon receipt of appropriate supporting documentation.

**\*Employees will be required to provide documentation of compliance for second vaccination dose with respect to clinic availability and guidelines but no later than October 20, 2021.**

Effective immediately, All New Hires will be required to comply with the COVID-19 policy as described prior to start date, unless approved for an Exemption or Accommodation. New Hires must provide vaccination documentation prior to start. Employees that have received only first vaccination prior to start date must provide documentation of second vaccination within thirty days of hire to be eligible for continued employment.

**Requests for Exemptions as Accommodations**

To assist any employee who is disabled, or who has a qualifying medical condition or concern that contraindicates the vaccination, or who objects to being vaccinated on the basis of sincerely held religious beliefs and practices, the Company will engage in an interactive process to determine if a reasonable accommodation can be provided so long as it does not create an undue hardship for the Company and/or does not pose a direct threat to the health or safety of others in the workplace and/or to the employee. To request an accommodation for one of the above reasons, please notify the Vice President of Organizational Development, Laura Holmes in writing at [laholmes@halllkeen.com](mailto:laholmes@halllkeen.com).

Once the Company is aware of the need for an accommodation, the Company will engage in an interactive process to identify possible accommodations. If you believe that you have been treated in a manner not in accordance with this policy, please notify the Company immediately by speaking to the Vice President of Organizational Development, Laura Holmes by phone at (781) 915-3012.

You may request an accommodation without fear of retaliation.

Employee Name: \_\_\_\_\_

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_