Integrating COVID-19: Vaccines and the Workplace
Integrating COVID-19
Vaccines into Corporate
Wellness Strategy

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December 11, the FDA approved Pfizer's COVID-19 vaccine for use in the United States, with industry observers expecting the Moderna vaccine soon to follow. Although the Pfizer vaccine and others are unlikely to have widespread distribution until the second quarter of 2021,¹ it's important for organizations to integrate the COVID-19 vaccine into their corporate wellness strategy immediately.

Here are some questions and answers addressing the COVID vaccines' impact on wellness strategies — and how to best integrate a vaccine program into your organization.

What does the COVID vaccine have to do with corporate wellness? The COVID-19 vaccine will play a primary role in prevention. Early detection and prevention play a significant role in keeping employees healthy and at work, and these are cornerstones to a holistic wellbeing strategy. As employers begin to orchestrate the role a COVID vaccine plays in their overall COVID strategy, the most similar comparison we can make is to how flu vaccines are currently used in the workplace. In fact, much of the written guidance regarding use of the COVID vaccine in the workplace is based off guidance provided around flu vaccinations, which have been an integral part of employer prevention strategies for many years.

Does this mean employees who are vaccinated no longer need to mask? A best practice wellbeing strategy is long-term and ever evolving, and your COVID strategy should follow suit. Clinical trial results are very promising, but experts agree that until the efficacy of the vaccine is proven in the real world— and a significant portion of the population has been vaccinated — social distancing, handwashing, mask-wearing, disinfecting, screening and testing will all continue to play integral roles in employer prevention and safety protocols for the near future.

As part of an employer sponsored wellness program, can employers require the COVID vaccine? Without specific guidance from the EEOC, DOL, and CDC, we are unable to know exactly how administration of the vaccine will fit into in a formal wellness program. It is important, however, to distinguish between employers that will *require* employees to receive COVID vaccines, versus *voluntary* wellness programing. In general, under certain circumstances employers may require employees to receive the COVID-19 vaccine. However, there are specific and certain limitations, subject to at least two significant federal laws: (1) the Americans with Disabilities Act; and (2) Title VII of the Civil Rights act of 1964 (religion). As a threshold matter, employers implementing a mandatory vaccination program must make modifications and accommodations based on certain protected classes. Employers must also ensure that the rationale requiring vaccinations is based upon objective facts, tied to employees' job descriptions, and administered consistently. See HUB's <u>Understanding Employment Law and Vaccines</u> eBook for a comprehensive review of the relevant employment laws.

¹NPR.org, "What You Need To Know As The First COVID-19 Vaccine Heads Your Way," Dec. 12, 2020.

Can employers provide rewards for employees who voluntarily receive the flu vaccine through the workplace? It is yet to be seen if the EEOC rules will support financial rewards for employees and covered dependents who voluntarily get a COVID vaccination as part of a wellness program. If the EEOC treats the COVID vaccination like the flu vaccine, it's possible that a COVID vaccination program may be incorporated into a more formal incentive program rewarding voluntary completion of various wellness activities. Since guidance has yet to emerge, employers should proceed with caution. We recommend discussing with outside counsel.

Will flu vaccination vendors be administering COVID vaccines onsite? We are following CDC guidelines acknowledging that the general public's access will follow behind workers in healthcare, nursing homes, first responders, and high-risk individuals. We are in contact with the largest national providers of screenings and vaccinations, all of whom responded that it is too soon to know exactly what will be available, or when it may be available, to the employer population. We anticipate long-term we will see onsite COVID vaccination clinics set up like flu clinics. We will continue to keep a close eye on this for our employer clients.

As we look back on 2020, is there anything employers might have done differently with their wellness strategies to help reduce the impact of COVID on their population? COVID shined a spotlight on the critical health issues some employers have attempted to address through their wellness programs for many years. Obesity and diabetes are two of the leading co-morbidities researchers have identified as exacerbating COVID-19 acuity and mortality. Inpatient hospital admission data points directly to employees with obesity (BMI >30 kg/m2) and/or diabetes, as leading indicators of COVID illness severity. According to the CDC, 13% of adult COVID patients are diabetics. Obese and/or diabetic COVID patients stay in the hospital longer and have a higher morbidity rate in comparison to their healthier counterparts. Effective diabetes management and weight management programs could have helped mitigate the severity of cases in the population, therefore reducing absences, leaves, health plan costs and even life insurance claims for employers. HUB uses a data analytics engine to identify higher risk populations and can support employers in making data-driven decisions to implement targeted programs.

How should employers handle the mental health component of the vaccine?

Though there is much excitement in anticipation of a vaccine, it is certainly mixed with anxiety, or even trepidation for some. Employees may have anxiety or trepidation in receiving it, asking if the shot will hurt, if they'll get COVID symptoms as a result, and if they can suffer long-term side effects. Acknowledge your employees' fears and arm them with information and support. Leadership should provide guidance for employees to help them navigate available resources. Clinical information is readily available, through HUB and through the CDC that can be shared with employees as part of a comprehensive communication campaign. This will set appropriate expectations and help allay fears employees may be experiencing. We also strongly encourage employers to continue promoting their mental health resources, including benefits provided through the health plan, employee assistance programs (EAPs), and those offered through their wellness programs. A final note is to push forward with programs

that support self-care. Holistic wellbeing practices including exercise, healthy eating and stress-management can build the mental resiliency needed through this evolving situation.

What if we don't have a focused wellness initiative? It's never too late to start. If you don't have a program today, it's likely because it hasn't been made a corporate priority. If there's one good thing COVID has highlighted the need for a focused strategy on employee health and wellness initiatives to support that strategy. Start with building awareness of key health risks and promoting current tools and resources. For COVID, leverage health plan offerings, an employee assistance programs (EAP) or carrier tools. Work with your benefit advisors, risk managers and wellbeing specialists to determine the "why" behind some of your population's risk using medical, pharmacy, workers comp and biometric data. Assessing employee needs and interests is also key in developing an effective wellbeing initiative.

Finally, consider long-term strategies that address the five key areas of wellbeing — physical, mental, social, financial, and community — to create a whole-person wellbeing architecture.

Get the latest information, guidance and resources on Coronavirus (COVID-19) to help you protect what matters most at hubinternational.com/coronavirus.

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