



INTER-OFFICE MEMORANDUM

TO: All LMHA Employees

FROM: Joyce A. Babb, Director of Personnel

SUBJECT: COVID-19 Mandatory Vaccination Policy

DATE: December 6, 2021

On November 5, 2021, the Occupational Safety and Health Administration (OSHA) published COVID-19 *Emergency Temporary Standards (ETS)* which also became effective November 5, 2021. Among other requirements, the ETS mandated that covered employers develop, implement, and enforce a policy on COVID-19 vaccination by December 6, 2021, or face substantial financial penalties for failure to do so. The ETS provided two options on which the employer could establish a policy: (1) adopt a mandatory vaccination policy in which all employees are required to be fully vaccinated; or (2) adopt a policy requiring employees to either get fully vaccinated or undergo weekly COVID-19 testing and wear a face covering while at work.

On November 17, 2021, the Louisville Metro Housing Authority's (LMHA) Board of Commissioners adopted the option to require mandatory COVID-19 vaccination for all employees. Notification was sent to all employees informing of the Board's decision and that LMHA was in the process of developing the full policy in accordance with the ETS requirements. Employees were also informed that the status of the ETS rule was in circuit court where an action to block the implementation of the rule had been filed. However, since no decision had been made, LMHA's Board recommended that we proceed with the planning for the implementation of the ETS requirements.

The ETS remains in circuit court, and the "stay" remains in force. Therefore, LMHA will not be implementing a mandatory policy as of December 6, 2021. No action will be taken until after additional discussion at LMHA's Board of Commissioners' meeting on December 21, 2021.

In the meantime, if you have any question, please feel free to contact the Personnel Services Department.

cc: Lisa Osanka