

COVID-19 Vaccination Requirement

October 5, 2021

Purpose

The United States Olympic & Paralympic Committee (“**USOPC**”) is adopting this COVID-19 vaccination requirement to safeguard the health of our athletes, team members, coaches, trainers, contractors, vendors, and any others visiting USOPC facilities, attending internally managed sport activities, and joining USOPC delegations to international sport events. The USOPC is committed to complying with all applicable federal, state and local laws, and following the guidance of other public health and licensing authorities, such as the Occupational Safety and Health Administration (OSHA) as well as the Centers for Disease Control and Prevention (CDC). Because these laws and/or guidance may change, so too may this document be amended.

Scope

The vaccine requirement applies to:

- 1) all individuals who work, visit, or provide services at USOPC Facilities as well as all individuals attending any activities conducted by an internally managed sport.
 - When used in this document, “**USOPC Facilities**” refers to the USOPC Headquarters, the Colorado Springs Olympic & Paralympic Training Center, the Lake Placid Olympic & Paralympic Training Center, the USOPC office located in Washington, D.C., and the sports medicine clinic that the USOPC operates in Chula Vista, CA.
 - Activities conducted by an internally managed sport include but are not limited to, camps, training sessions, and competitions and are referred to throughout in this document as “**internally managed sport activities.**”

and

- 2) All individuals attending a USOPC Delegation Event as part of a USOPC-led delegation.
 - When used in this document, “**USOPC Delegation Event**” means, individually or collectively as applicable, the Olympic and Paralympic Games and the Pan American and Parapan American Games, as well as any other international sport event to which the USOPC leads a delegation.

For clarity, the individuals referred to in (1) and (2) above include athletes, team members, coaches, trainers, contractors, vendors and any others who work, visit, or provide services and will be collectively referred to throughout this document as “**Covered Individuals.**” Covered Individuals does not include vendors and contractors who will be on USOPC property but remain outside a USOPC Facility, or are inside a USOPC Facility for less than 1 hour so long as they do not have contact with athletes (e.g., delivery drivers) and so long as they are not athletes, USOPC staff, or NGB staff otherwise already covered by this vaccine requirement. Covered Individuals also does not include individuals coming to a USOPC Facility, internally managed sport activity, or USOPC Delegation Event as required by an emergency situation; however, all such individuals must follow all applicable COVID-19 mitigation measures (e.g., face masks, hand washing, physical distancing.)

Vaccine Requirement

As of **November 1, 2021**, all Covered Individuals are required to (1) be fully vaccinated in accordance with current CDC guidelines and definitions and (2) submit documentation of such vaccination to the USOPC, or secure an approved exemption, before the applicable deadline below. Note that while certain Covered

COVID-19 Vaccination Requirement

October 5, 2021

Individuals may be described in more than one category listed below, they must submit proof of full vaccination or have received a vaccination exemption by the earliest deadline that applies to them:

- **October 1, 2021:** Covered Individuals may begin submitting their full vaccination documentation or the process for requesting an exemption from the vaccine requirement.
- **November 1, 2021:** the USOPC vaccination requirement takes effect and all Covered Individuals must submit proof of full vaccination or receive a vaccination exemption prior to entering any USOPC Facility or participating in an internally managed sport activity or USOPC Delegation Event (other than the Beijing Winter Games, which is subject to the Dec. 1 deadline below).
- **December 1, 2021:** the date by which all individuals on the long list for the Beijing Winter Games must submit proof of full vaccination or have received a vaccination exemption in order to participate in that USOPC Delegation Event.
 - **Note:** Exemptions must be granted and appeal decisions made **no later than** the December 1 date¹. Therefore, individuals on the long list for the Beijing Winter Games should have their request for an exemption submitted to the USOPC no later than **November 14, 2021** in order to allow sufficient time for it to be reviewed (which could take up to 7 days) and appealed (if the individual elects to appeal a denial of their exemption request).
 - **Note:** In the event an athlete or other participant was (a) not otherwise on the long list and (b) qualifies after December 1, they will have to submit their proof of vaccination to the USOPC or receive a vaccination exemption upon the earlier of 30 days or their departure for the Beijing Winter Games.
- **December 31, 2021:** all USOPC payroll staff, temporary agency staff, and contractors must be fully vaccinated or received a vaccination exemption by this date. USOPC staff members who do not meet this deadline will have their employment terminated by the USOPC while contractors, vendors and other non-staff members will not be able to access any USOPC Facilities, internally managed sport activities, and/or USOPC Delegation Event and may have their contracts with the USOPC terminated.

Previous history of COVID-19 from which the individual recovered more than 90 days earlier or a previous positive antibody test for COVID-19 does not waive the vaccination requirement. The process for seeking an exemption is explained below.

Any Covered Individuals who request and are approved for an exemption will be required to comply with all USOPC instructions regarding steps to be taken by unvaccinated individuals to reduce the risk of spreading COVID (e.g., mask wearing and social distancing), which will likely include a requirement to undergo regular COVID testing at a frequency to be prescribed by the USOPC. Such testing, when required, will be provided by the USOPC.

CDC guidance currently states that Covered Individuals are considered fully vaccinated two weeks after the second dose of a two-dose vaccine (i.e., Pfizer or Moderna), or two weeks after a single-dose vaccine (i.e., Johnson & Johnson, Janssen). If such guidance is updated or revised by the CDC, including by requiring booster shots, the new definition of “fully vaccinated” will be applicable for any Covered Individuals after that amendment. In the event this definition changes, Covered Individuals will be given a reasonable amount of time to become fully vaccinated but may be required to stay off-site and/or not participate in internally managed sport activities or USOPC Delegation Event until they have done so.

¹ Note that while the USOPC may honor an exemption for a member of a USOPC Delegation Event, rules of other third parties (e.g., the local organizing committee, the IOC, the IPC) may also apply and the USOPC has no control over those rules or their enforcement. Nothing in the USOPC’s vaccination rules can replace or limit the rules of those third parties.

COVID-19 Vaccination Requirement

October 5, 2021

To establish that they are fully vaccinated, Covered Individuals must demonstrate that they are fully vaccinated via one of the Proof of Vaccine Options below. The USOPC will preserve the confidentiality of that information as appropriate. Please contact the vaccination confirmation team at usopcer@ilgdenver.com if you have any questions.

Covered Individuals may use state and local public health providers and pharmacy outlets to obtain appointments to receive the vaccine. As well, Covered Individuals may work with their medical provider to determine where to obtain a COVID vaccination, or may utilize the CDC's Vaccine Finder website: <https://www.cdc.gov/vaccines/covid-19/reporting/vaccinefinder/about.html>. Paid leave may be available for USOPC team members to cover time spent receiving the COVID-19 vaccination, as detailed in the USOPC Team Member Handbook.

Proof of Vaccine Options

Covered Individuals will receive a link to access the vaccine management system, OnTask, on or before October 1, 2021 with instructions on how to upload their proof of vaccination. The following types of documentation will be accepted:

1. A COVID-19 Vaccination Record Card (issued by the Department of Health and Human Services Centers for Disease Control & Prevention or World Health Organization Yellow Card) which includes name of person vaccinated, type of vaccine provided, and date last dose administered), OR
2. a photo of a Vaccination Record Card as a separate document, OR
3. a photo of a Vaccination Record Card stored on a phone or electronic device, OR
4. documentation of vaccination from contracted employers who follow these vaccination records guidelines and standards.

NOTE: The creation, purchase, or sale of vaccine cards by individuals is illegal and endangers public safety. The unauthorized use of an official government agency's seal on such cards is a crime. Criminal penalties may include hefty fines and prison time and are grounds for disciplinary action. USOPC penalties may include further sanctions, up to and including termination for USOPC team members or termination of access to USOPC Facilities, internally managed sport activities, and/or USOPC Delegation Events.

Exemptions

Covered Individuals in need of an exemption from the vaccine requirement for a legitimate medical reason or because of a sincerely held religious belief must contact the vaccination confirmation team at usopcer@ilgdenver.com to begin the interactive accommodation process as soon as possible and prior to entering any USOPC Facility, or participating in any internally managed sport activity or USOPC Delegation Event. During the time in which a Covered Individual is waiting on a decision as to whether their exemption has been granted and/or is waiting on a decision regarding an appeal of a denied exemption request (if applicable), they will be subject to all the requirements applicable to individuals who have been granted an exemption request (e.g., regular testing).

Appeal Process for Denied Exemption Requests

A Covered Individual may have an opportunity to challenge a denial of their exemption request as outlined below:

COVID-19 Vaccination Requirement

October 5, 2021

- USOPC staff and contractors: the decision of the Vax RAP is final and there is no right to appeal the denial of an exemption. “Staff” includes USOPC payroll staff and temporary staff members. Vax RAP decisions are final for USOPC staff and contractors regardless of whether the USOPC staff or contractor also qualifies as an OPTC visitor or member of a USOPC Delegation Event.
- Participants in an internally managed sport activity: the denial of an exemption request may be appealed through the complaint procedures for that particular sport.
- OPTC visitors: the denial of an exemption request may be appealed through the OPTC hearing procedures.
- Members of USOPC Delegation Events: the denial of an exemption request may be appealed to the Games Administrative Board.

In cases where a Covered Individual wants to appeal the decision of the Vax RAP but will be participating in OPTC activities, internally managed sport activities, and/or as a member of a USOPC Delegation Event, the appropriate body for appeal will be the first with which the individual will interact. In all cases, the scope of the appeal of the denial will be focused on the reasons for the denial. There is no right to the review of the rule itself and decision of the appeal body is final and binding and will apply across all interactions with the USOPC. More information around the appeal process will be provided when an exemption request is denied.

Modifications

This document is subject to change without prior notice, at the sole discretion of USOPC; however, the USOPC will make best efforts to communicate any and all changes to all Covered Individuals in advance.

Enforcement and Non-Retaliation

Please direct any questions regarding the vaccine requirement to the vaccination confirmation team at usopcer@ilgdenver.com. For USOPC team members, failure to comply with the vaccine requirement may result in discipline, up to and including termination of employment. Failure to comply with the vaccine requirement by vendors, independent contractors, and all others subject to the vaccination requirement may result in termination of their contract with the USOPC and/or a loss of access to USOPC Facilities, internally managed sport activities, and/or USOPC Delegation Events.

The USOPC prohibits any form of discipline, reprisal, intimidation, or retaliation against anyone reporting a violation of the vaccine requirement or any other health and safety concern. Concerns may be reported to the vaccination confirmation team (at usopcer@ilgdenver.com) or to the Ethics Team (via the USOPC Integrity Portal at 1-877-404-9935 or [online](#)). Note that reports to the USOPC Integrity Portal may be made anonymously.

Revision History

Date	Revisions
September 21, 2021	Original document published
October 5, 2021	(1) clarified details around the December 1 deadline for long list participants, (2) described what protocols apply when a Covered Individual is waiting on a decision regarding an exemption request or an appeal of a denied exemption request, (3) added language about the appeal process.