



**Independent
Bankers
Association
of Texas**



COVID-19 Vaccination Survey Report

February 2021

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Introduction

With each phase of the COVID-19 pandemic, Texas community bankers have been faced with new questions and considerations to keep their banks running while protecting their employees from the risks associated with the virus.

As we enter a new phase of pandemic response and vaccinations are becoming available throughout Texas, bankers must consider how they will handle the practical, legal and human resources considerations associated with vaccination.

The Independent Bankers Association of Texas (IBAT) conducted a COVID-19 vaccination survey from January 26-29, 2021. Seventy-five community banks participated in the survey. Responses are provided without the caveat of bank size or number of employees. Comments provided in questions with open responses have been combined or excerpted, as appropriate, to capture the variety of responses received.

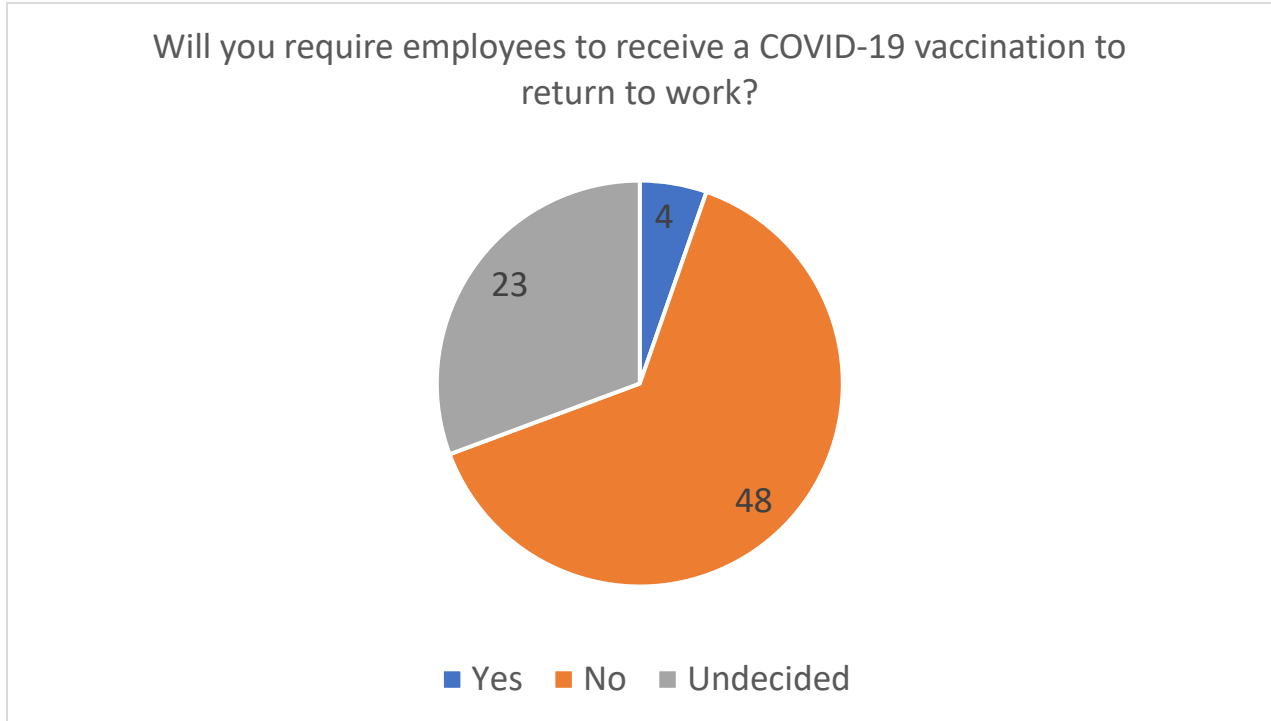
It is not the intention of IBAT to endorse any course of action or set of protocols for community banks to follow. Just as in every phase of this pandemic, we seek only to leverage the feedback of others so that community bankers can evaluate their plans with knowledge of how others are handling the same issues.

Where appropriate, the survey results have been supplemented by thoughts from IBAT's legal and compliance staff.

We hope that this survey is helpful to you and your team as you formulate your bank's plan for vaccination response.

Survey Responses

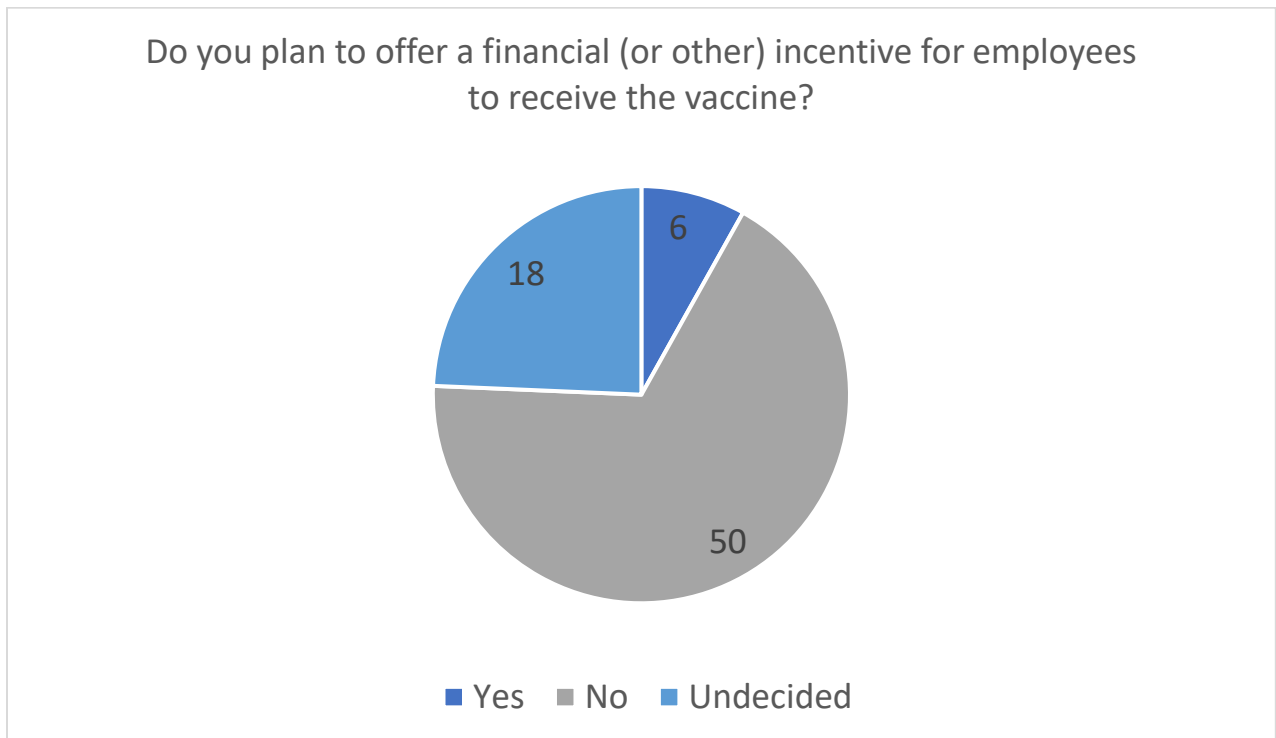
Question #1



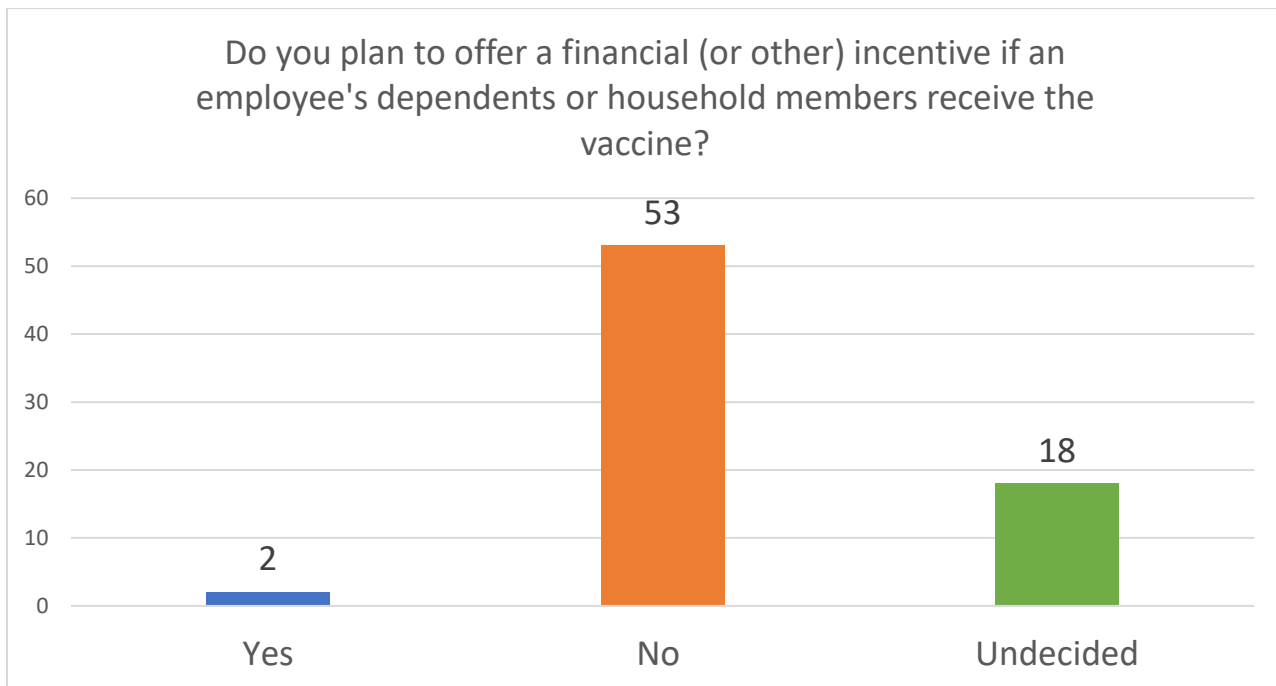
Follow Up Question:

Those bankers that answered “yes” to the question above were asked if they would set a deadline for employee to receive the vaccine once it is widely available. Responses were split with two bankers answering “yes” and two bankers answering “no.”

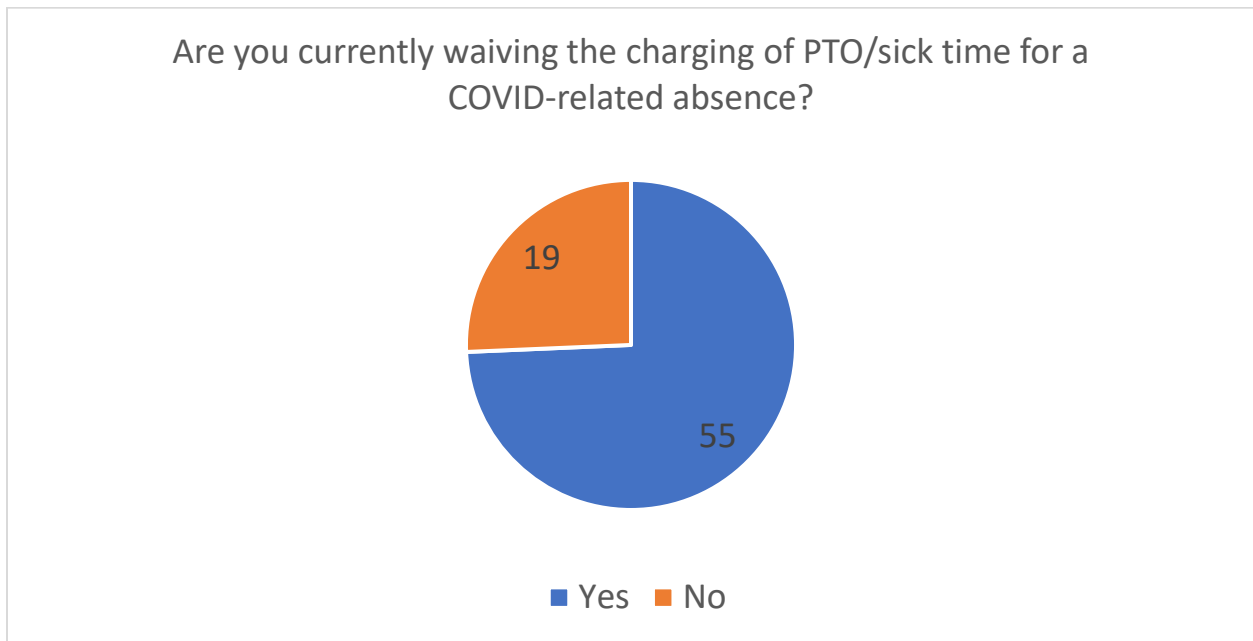
Question #2



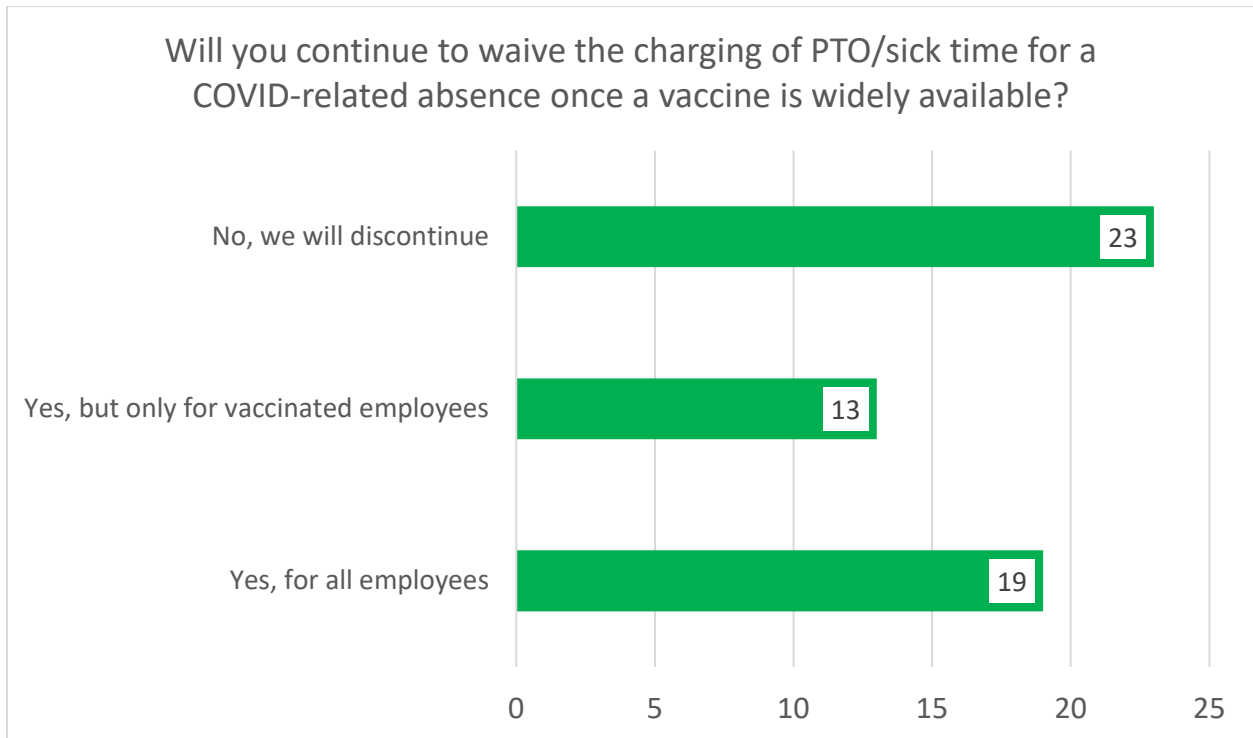
Question #3



Question #4



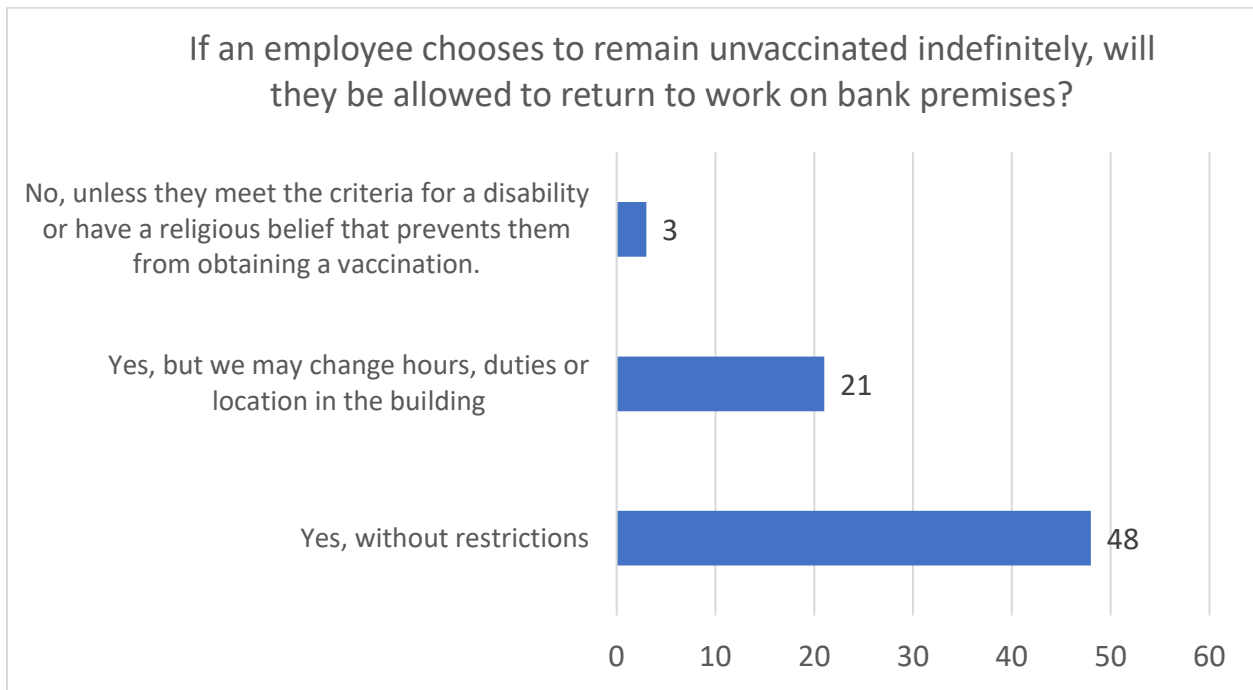
Question #5



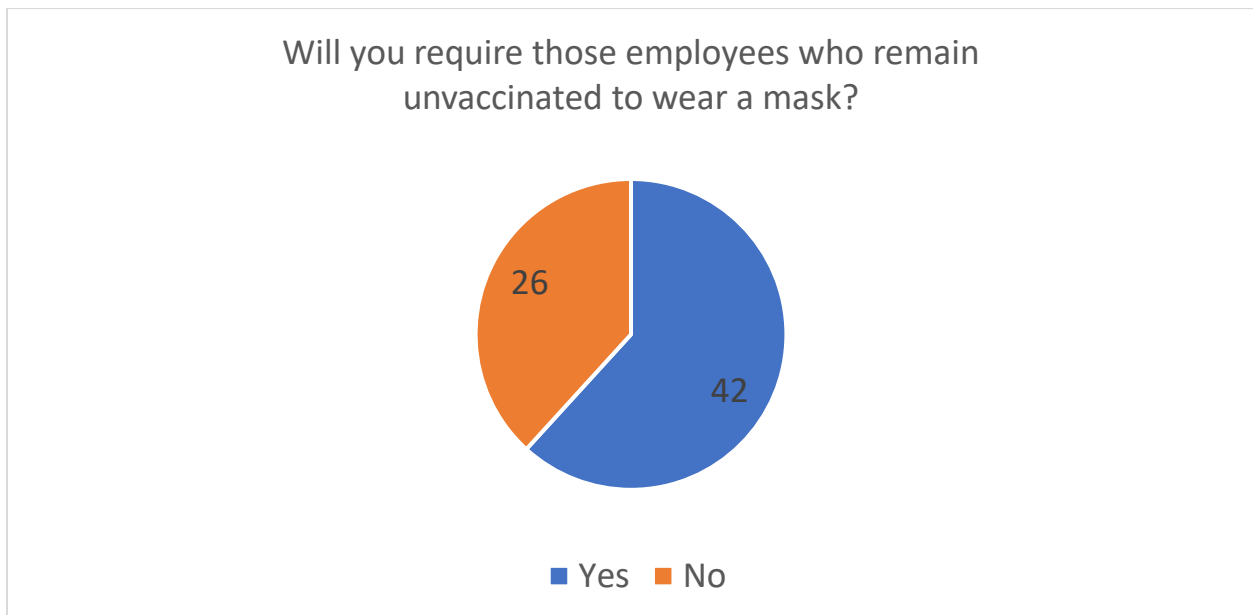
Note: In your bank's vaccination policy, you should include information on "paid time off" for employees to receive their vaccine. This could also cover the charging of any PTO/sick time for adverse reactions to the vaccination.

The Families First Coronavirus Relief Act requirements relating to mandatory leave expired 12/31/2020.

Question #6



Question #7



Question #8

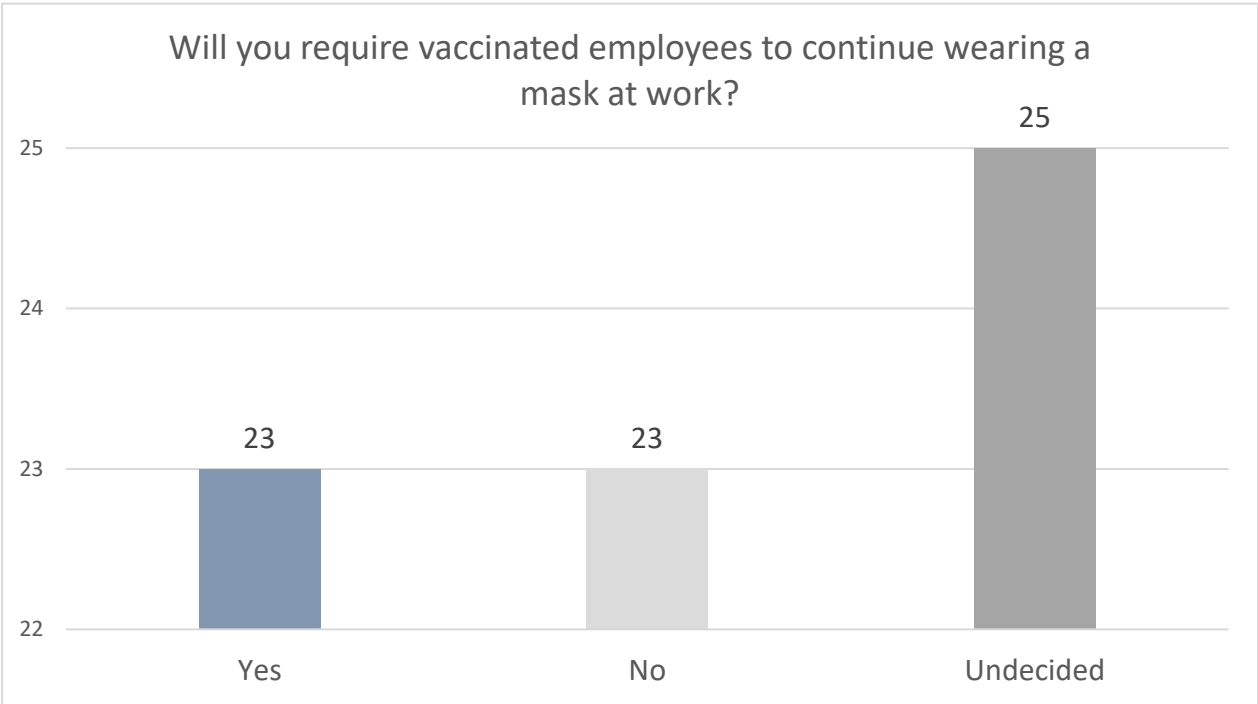
Please describe any other restriction you will place on employees who remain unvaccinated.

“Travel restrictions outside of the U.S.”

“We require employees to answer a daily text of COVID-related questions. Unvaccinated employees will continue to do this, along with using PPE, for an indefinite period of time.”

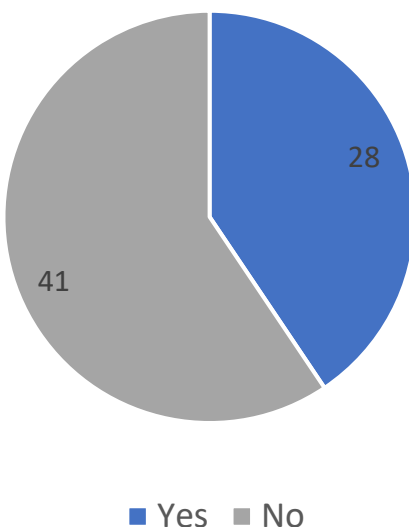
Note: *Be aware of federal restrictions on re-entry as a result of Executive Orders.*

Question #9



Question #10

Do you plan to keep proof of an employee's vaccination in his/her human resources file?



Note: Employers choosing to keep a record of an employee's vaccination should consider this protected health information and treat it accordingly.

Additionally, employers should be aware of requirements under the Americans with Disabilities Act which requires that disability-related medical information about an employee be maintained in a confidential medical file that is kept separate from the employee's personnel file. Such information may be disclosed in limited situations including:

- By supervisors or managers must evaluate work restrictions or accommodations.
- By first aid and safety personnel, if a disability might require emergency treatment.
- By government officials investigating compliance with the ADA.

Question #11

What accommodations would you make for an employee who doesn't want to be vaccinated?

If possible, we would allow the employee to work from home.

We will only make a special accommodation for those that meet the legal definition of requiring an accommodation.

None.

Uncertain.

Question #12

What other steps are you taking to address issues related to vaccinations in your bank?

If an option, we would provide onsite vaccinations to those employees who choose to receive the vaccine.

Making information available but leaving it completely up to the employee.

We are not requiring the vaccine but encourage (not require) all employees to wear a mask, social distance and thoroughly wash hands.

We will maintain CDC-recommended protocols.

We will continue to provide paid leave for quarantining, capped at 120 hours for full time employees, for the duration of the pandemic.

We will require all of our existing protocols (masks, social distancing, plexiglass shields and gloves for tellers) until we decide sufficient time has passed for all who want a vaccine to have received one in Texas.

This depends on severity of positive cases in our area. If case numbers drop significantly, we will likely not take other steps than to leave the PPE that was in place.

Offering a \$250 incentive for vaccination and pay for up to \$250 in testing.

Using and implementing common sense.