

Current Status of Federal COVID-19 Vaccination Mandates

| Type of Employer / Employee | Type of Rule | Effective Date | Current Status | Steps / Recommendations for Employers |
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| Private Employers with 100+ employees | OSHA Emergency Temporary Order | <i>Originally December 5, 2021 and January 4, 2022</i> <i>Moved to January 10, 2022 and February 9, 2022</i> | Not effective Federal Court stay in place per the U.S. Supreme Court decision on 1/13/22 | Employers could continue preparations to comply with the mandate in event stay is lifted or could postpone preparations until the merits of the mandate are decided through the federal court system. |
| Health care workers employed by employers who participate in Medicare / Medicaid programs including providers and suppliers | CMS Rule | <i>Originally December 5, 2021 and January 4, 2022</i> Now January 27, 2022 and February 26, 2022 (for states with no stay) Now February 14, 2022 and March 15, 2022 (for states with a lifted stay) | Effective for all states There was no federal court stay for certain states but for the remaining states, the U.S. Supreme Court lifted the stay on 1/13/2022 | Affected employers in all states should prepare in order to meet the current deadlines. The first date represents the deadline for the first dose, and the second date represents the deadline for the second dose (and the single dose vaccine) There are technically different (later) effective date for states that were under the stay, these states are: Alabama, Alaska, Arizona, Arkansas, Georgia, Idaho, Indiana, Iowa, Kansas, Kentucky, Louisiana, Mississippi, Missouri, Montana, Nebraska, New Hampshire, North Dakota, Ohio, Oklahoma, South Carolina, South Dakota, Utah, West Virginia and Wyoming. |
| All federal workers and contractors including all employees working on or in connection with covered federal government contracts and subcontracts | Safer Federal Workforce Taskforce Guidance | <i>Originally December 8</i> <i>Moved to January 4, 2022</i> <i>Moved to January 18, 2022</i> | Federal Court stay for all states | Affected employers should continue preparations to comply with the mandate in event stay is lifted |