

Current Status of Federal COVID-19 Vaccination Mandates

Type of Employer / Employee	Type of Rule	Effective Date	Current Status	Steps / Recommendations for Employers
Private Employers with 100+ employees	OSHA Emergency Temporary Order	<i>Originally December 5 & January 4</i> Now January 10 & February 9	Mandate effective Federal Court stay was lifted for all states by 6 th Circuit Court of Appeals	Continue determining which employees are not vaccinated so masking protocols for employees who are unvaccinated is in place by January 10 If employers decide to offer weekly testing in lieu of vaccinations, weekly testing policies and procedures should be in place by February 9
Health care workers employed by employers who participate in Medicare / Medicaid programs including providers and suppliers	CMS Rule	December 5 & January 4	Federal Court stay was lifted only for certain states Mandate effective for certain states	Employers in states where the stay was lifted should be prepare in order to meet the current deadlines. These states are: California, Colorado, Connecticut, Delaware, DC, Florida, Hawaii, Illinois, Maine, Maryland, Massachusetts, Michigan, Minnesota, Montana, Nevada, New Jersey, New Mexico, New York, North Carolina, Oregon, Pennsylvania, Rhode Island, Tennessee, Vermont, Virginia, Washington, Wisconsin Employers in states where the stay is still in place should continue preparations to comply with the mandate in event stay is lifted.
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>Then January 4</i> Now January 18	Federal Court stay for all states	Should continue preparations to comply with the mandate in event stay is lifted