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Case Study on Vaccine Requirements

Company/Organization: National Safety Council

Interviewees: Katherine Mendoza, EHS Director

Number of Employees: 240

Interview Date: April 4, 2022

This case study reflects information obtained at the time of interview.

Background

The National Safety Council knows vaccines are the safest, most effective way to slow COVID-19 transmission and prevent hospitalization and death. To provide the safest possible workplace, thousands of private employers implemented policies requiring their workers to get vaccinated against COVID-19. These requirements largely remained in place even after the U.S. Supreme Court blocked an OSHA Emergency Temporary Standard that would have obligated all employers of 100 or more workers to ensure those workers are vaccinated against COVID-19 or present a negative test at least weekly.

The National Safety Council (NSC) was interviewed by Meteorite, the social-impact communications firm that powers the Health Action Alliance (HAA), to divulge the planning, processes and results of the company's vaccine requirement. This case study reviews best practices to share with other employers for use during the COVID-19 pandemic or in future public health crises when implementing a worker vaccine requirement.

Planning and processes

SAFER Vaccine Requirement Spectrum



According to the Council’s [Vaccine Requirement Spectrum](#), companies can put in place various levels of vaccine requirements depending on their workforce’s risk. NSC implemented a hard requirement for all employees with the option to submit medical or religious exemptions for existing employees. NSC defined full vaccination status as two weeks after the two-dose regimen of Pfizer and Moderna, or two weeks after the single dose of the Johnson & Johnson vaccine. Staff, along with new employees, were required to provide official documentation of vaccine status to HR.

Before a requirement was put in place, NSC strongly encouraged the vaccine through communications tactics. Some staff expressed concern about the Emergency Use Authorization vs. full FDA approval. NSC continued to reinforce the vaccine and provide information about efficacy.

Decision makers at NSC met to discuss COVID-19 and consider a vaccine requirement for employees. The people leading these conversations were mainly CEO & President Lorraine Martin, EHS Director Katherine Mendoza, as well as the chief operating officer, chief human resources officer, chief financial officer and chief marketing and communications officer. NSC requested employee feedback through three surveys which asked about how safe workers felt, how supported they felt, and more. Leadership also created an inbox where workers could ask questions or raise concerns. Responses from the surveys helped leadership make decisions about how to approach a vaccine requirement and how to time the implementation.

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“It was very important for us to make sure people were informed, especially in the beginning” said Mendoza. “It was good to understand what the majority of people felt, and a majority were supportive of the requirement. That reassured us that if we implemented a requirement, a majority of our people welcomed it.”

Putting the requirement into effect

In implementing the requirement, the Council strived to keep staff safe, to serve as a model for the broader community, and to support the communities in which the organization operates.

Communication was key. Leadership made it a priority to communicate with staff often and to hear concerns. The first step for NSC was to update all internal procedures and policies. The company held a webinar with a board member who is a health professional and sent out various internal emails describing timelines and exemptions. A November 3, 2021 all-staff town hall was held to talk about the requirement and get feedback and questions from workers. NSC gave workers a two month notice to be in compliance with the COVID-19 policy guideline.

Some staff expressed concern about mandating the vaccine before full FDA approval. The mandate for in-person staff came before the full requirement for all employees. Only those who needed it for their job function had that mandate initially. Those working remotely weren't at elevated risk. Once the building opened up, the requirement expanded to all employees – regardless of where they worked.

Only five full-time employees, all fully remote, and one part-time employee required exemptions. “We're fortunate we have a very small portion of individuals who have exemptions so from a risk perspective, it's relatively small,” Mendoza said. “Initially those who opted into the exemption process didn't have in-person interactions so there was no exposure to other individuals. Once we opened our facilities for full operations, those who have an exemption also have additional procedures in place to control the risk to others and to protect themselves.”

When asked about challenges with regulations or labor shortages, NSC indicated they had not seen any as a result of the policy. Three employees chose to end their employment when the requirement was put in place. Overall, it had little impact on business, and NSC was able to staff the open positions before the requirement went into effect.

Results, impact and lessons learned

After the requirement was in place, NSC had a worker vaccination rate of 100% (excluding workers who were exempt). At the time of the interview, NSC had no COVID-19 transmissions as a result of business functions, and two hospitalizations – one person was hospitalized before vaccines were widely available and the other person was vaccinated but at high-risk for complications due to infection.

“I think the biggest success in our vaccine requirement rollout was that we haven't had any transmissions in the workplace,” said Mendoza.

“We knew the best way to keep our employees safe was by staying informed and adapting for community conditions,” added Lorraine Martin, president & CEO of NSC. “As we and the world began to better understand the infectious disease, we stayed flexible in our guidance and protocols to successfully and thoughtfully protect our staff from transmission while continuing to operate.”

Even with the success in keeping people safe at work, NSC did run into some challenges. Ensuring employees had credible, science-based information on the benefits and risks of vaccination proved difficult

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as the world was still learning about and studying these topics. At the same time, politics had become very intertwined with people's personal medical health choices. "There's a necessary level of empathy you have to have when listening and communicating," Mendoza said. "There's a wide spectrum of people who are low risk and don't love the idea of requirements, people who don't think COVID-19 is a large enough risk for a requirement like this, but got vaccinated in order to stay employed, and some who are 100% advocates for these steps."

Martin added, "It was important to us that staff understood why each decision was made and where the data and guidance was coming from. With some employees still hesitant to interact with other workers regardless of the many layers of protections, we knew the best approach would be to continue talking about it to learn where everyone's thinking was, and how we could do right by our colleagues, the business and the communities we live and work in."

NSC brought experts in to discuss the vaccines and workers were able to raise concerns. A mental health approach was also taken in order to make sure the organization was committed to staying flexible and supporting staff.

When asked if NSC would have changed anything in regards to the vaccine requirement, leadership indicated they would have wanted to provide more space for employees to express concerns that weren't aligned with a majority of people's thoughts. NSC recognizes the need for a delicate balance of majority and minority thoughts around requirements.

Much of the work done by the SAFER team at NSC influenced the organization's actions around requirements. Overall, NSC indicated it would have been helpful to benchmark with a network of companies with mandates, as it was sometimes difficult to learn from companies that didn't have a requirement because experiences were so different.

About

National Safety Council: The [National Safety Council](#) is America's leading nonprofit safety advocate – and has been for more than 100 years. As a mission-based organization, we work to eliminate the leading causes of preventable death and injury, focusing our efforts on the workplace, roadway and impairment. We create a culture of safety to not only keep people safer at work, but also beyond the workplace so they can live their fullest lives.

Health Action Alliance: The Health Action Alliance is a joint initiative of the Ad Council, the CDC Foundation, the de Beaumont Foundation, the National Safety Council and the Robert Wood Johnson Foundation—in partnership with Meteorite. Together, we work to promote COVID-19 prevention and vaccination, advance health equity, strengthen business resilience for future pandemics, and support employee mental health.