
CARPENTERS

46 Northern California Counties Conference Board

CHRIS PEDROZA

Executive Director

To: Signatory Employers/Employer Associations

Date: September 7, 2021

RE: Mandated COVID-19 Policies

Mandating COVID-19 vaccinations for all employees complies with Federal and State law. Based on guidance from the Centers for Disease Control (CDC), the U.S. Department of Labor and other governmental agencies, certain employers are mandating COVID-19 vaccination policies. These policies require employees to demonstrate proof that they have been fully vaccinated for COVID-19, unless the employee qualifies for reasonable accommodation on account of religious belief, disability or other legally protected basis.

In order to comply with the terms of the Master Agreement(s), a signatory employer wishing to mandate COVID-19 vaccinations must submit an application to the Carpenters Work Preservation Committee (CWPC) and include a copy of the signatory employer's vaccination policy. Upon receiving approval, the terms of the CWPC decision shall apply to the signatory employer on all of its projects and to all of its Carpenters' Union signatory subcontractors at all tiers on each of its projects.

Each individual employer shall keep all Union represented employees' information related to COVID-19 vaccinations and tests private and confidential and may only share such information as permitted or required by law. Each individual employer remains solely responsible for strict adherence to all federal, state and local employment laws.

No Union member shall be disciplined for refusing to receive a COVID-19 vaccine or test, however, if the mandated vaccination policy is approved through the CWPC, the individual employer may exclude a Union Member from the project(s) if they have not obtained the mandated COVID-19 vaccine(s) or if applicable, COVID-19 test.

In summary, the law, including HIPAA, does not prohibit an employer from implementing policies to make the workplace safe, including requiring vaccinations with the narrow exceptions noted above, masking and/or testing and other safety procedures.

Please note that for client/owner's mandated vaccination and testing policies, a separate CWPC decision was approved (CWPC Decision No. 15797), wherein the signatory employer must submit the client/owner's mandatory vaccination and testing policy to the Union by emailing admin@46counties.org. The Union shall have 72 hours to object to the implementation of the client/owner's mandatory COVID-19 vaccination and testing policy.

Sincerely,



Chris Pedroza, Executive Director