

COVID Vaccine Policy Update 11.12.21 – Frequently Asked Questions

Updated 11.12.21

Please refer to the below FAQs for questions regarding Humana's COVID-19 Vaccine Policy Update, shared with associates on November 12, 2021. For answers to additional questions, please visit the [COVID-19 Vaccine Policy FAQs](#) and the [COVID-19 FAQs](#) found on the ASC.

What is the change to the vaccine policy?

Humana will require associates who work outside of their home to submit proof of vaccination or undergo weekly COVID testing and wear a face covering while at work. The weekly testing will need to be done through an approved Humana vendor, and unvaccinated associates should follow all social distancing and masking protocols if they are required to come into a Humana facility or work outside of their home.

Previous communications said decisions around our vaccine policy were based on who we are as a healthcare company and that you were prioritizing our health and safety, so why are we changing our position now?

Humana's priority is and will always be to protect the health and safety of our associates, members, and communities, and every decision we make throughout this global health crisis is rooted in that promise. OSHA standards for health and safety allow for a testing alternative, when combined with masking and social distancing protocols, in addition to vaccination.

How will you enforce the testing requirements?

In line with federal requirements, Humana will maintain and apply records that identify those associates in-scope for the testing requirement, other related data including facility access, and the ongoing submission of testing results, supported by third-party testing partners. A combination of technology integration and education will help to drive compliance, along with leader awareness and support of the policy. Associates who fail to comply with the policy will face disciplinary action, including termination.

Which testing vendor are we allowed to use?

Humana associates who remain unvaccinated but are required to perform work outside of their home will be required to undergo weekly testing. Associates will be provided approved options that are clinically sound, logistically practical, and can be offered at a negotiated price point, while satisfying the specific requirements outlined in the federal standard. The costs of the testing will be the responsibility of the individual associate beginning January 14, consistent with local laws and regulations. More information on testing, including vendor details, process and anticipated costs, will be shared in the coming weeks.

What if there isn't a sufficient number of tests available through the approved vendor?

Humana is working with approved vendors to ensure adequate supply and access to standard compliant test kits.

Can I submit the COVID testing through my Humana insurance? What if I have insurance coverage through another carrier?

Unlike other COVID-19 testing with the purpose of individualized diagnosis or treatment, these workplace testing costs for unvaccinated associates will not be covered under Humana insurance. The CARES act specifically excludes this type of employment-related testing from insurance coverage mandates. If you have coverage with another carrier, you will need to contact that insurance carrier to understand coverage specifics relating to your policy.

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Do associates who have received a medical or religious exemption have to pay for their tests, or will those be covered by Humana?

Humana will cover the costs for testing as required as a medical or religious accommodation.

The company previously committed to covering all expenses related to COVID, so why are you not covering this testing?

Unlike COVID treatment and diagnosis, these are employment-based tests required for associates who conduct work activity outside the home and actively choose not to be vaccinated. Actively choosing the testing pathway includes assuming responsibility for the related costs. This personal cost responsibility is supported by the new OSHA standards. Importantly, COVID vaccination continues to be widely available in communities at no direct cost to individuals.

If you believe you have been exposed to COVID or feel ill, individualized testing may be available separately with coverage under your group health plan.

Can I use my Healthcare Spending Account (or equivalent) for testing costs?

The cost of testing for COVID-19 is an eligible medical expense that can be paid or reimbursed under health flexible spending arrangements (health FSAs) and health savings accounts (HSAs). Contributions to health FSAs or HSAs were determined as part of the Open Enrollment period.

Are the tests on-site?

In select work settings, testing will be conducted on-site, though many participating associates will test at home. Information regarding testing options and processes will be shared in the coming weeks.

Will there be an additional charge on our benefits for unvaccinated associates, similar to biometrics or smokers?

There are no plans to charge unvaccinated individuals as part of our healthcare benefits.

What happens when your test is positive?

If your test comes back positive, you need to contact HR4U: Monday - Friday from 8 a.m. to 6 p.m. ET at 888-431-4748 or email at hr4u@humana.com. After 6 p.m. ET, or on the weekends, email hr4u@humana.com. HR4U will provide guidance regarding next steps and requirements.

How will my leader be informed of my test results? If I test positive, will I need to tell my leader myself?

The approved Humana vendor will notify you and Humana of your test results. However, you should ensure your leader is aware that you will need to remain home for a period of time.

Is it a HIPAA violation to share my COVID test results?

No, it is not, because Humana is acting in its capacity as an employer. HIPAA is a federal regulation designed to protect individually identifiable health information. HIPAA applies only to healthcare providers, health plans, healthcare clearinghouses and other HIPAA-covered entities. In general, the HIPAA rules do not apply to employers or employment records.

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How long will unvaccinated associates be required to be tested for COVID?

Associates who remain unvaccinated must undergo testing each week they work outside of their home. This policy will be in effect starting January 14 for the foreseeable future. Permanent OSHA standards are expected by mid-Q2 of 2022, and this policy may continue to evolve to align with changes to state and federal regulations.

How often do I need to submit a test if I only work outside of my home on occasion?

Associates are only required to undergo COVID testing for the weeks in which they work outside of their home.

How are you ensuring my health and safety while I'm in the facility?

The health and safety of all associates continues to guide all our decisions. All associates must complete a daily health screening prior to entering the facility. Additionally, masks and physical distancing are still strongly encouraged in facility high-traffic areas for all associates and are required for those who remain unvaccinated.

If I've received a role-based exemption, can I now participate in volunteer activities or in-person events so long as I submit a negative test?

Humana's first priority is to ensure unvaccinated employees who are required to work outside of their home are undergoing weekly testing. Therefore, at this time, those who have received a role-based exemption should refrain from work activities outside the home, and the testing required to engage in them. Further future guidance may evolve as conditions warrant.

President Biden's plan also called for unvaccinated individuals to wear masks at all times while working outside of their home beginning December 5. Will this be required for Humana associates? How will it be enforced?

Humana's policy already requires face coverings for unvaccinated associates, and that policy will continue. As this is a federal regulation, measures will be in place to ensure compliance at all times. Associates who do not comply with this policy will be subject to disciplinary action, including termination.

Which associates are required to get the vaccine, as outlined in President Biden's vaccine standard?

All federal contractors must be fully vaccinated, which affects Humana Government Business associates, including those who work from home, associates who work in the same facility with HGB associates, and those who perform support work on the TRICARE contract. Similarly, The Centers for Medicare & Medicaid Services (CMS) just issued an [Interim Final Rule](#) (IFR) mandating that staff employed at Medicare- and Medicaid-certified providers and suppliers be fully vaccinated by January 4, 2022. While this ruling covers a large majority of our Home business employees, including many Kindred at Home and onhome associates, it doesn't pertain to individuals who are fully work-at-home and who have no interaction with any other employee that is or could be patient- or member-facing.

I already became vaccinated as I wanted to maintain employment, but was told testing was not an option. Did you wait to make this decision in order to force more people to become vaccinated?

No. The company makes decisions based on the best information available at the time, and we are guided by many factors, including federal and state regulations. As we've said from the beginning, our priority is to protect the health and safety of our associates, members, and communities. We continue

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to encourage all associates to become vaccinated, as vaccines remain the best and most effective defense against COVID-19.

What does this mean for new hires or candidates?

For the roles where vaccination was required for employment and testing is now an alternative, those individuals will now be required to submit proof of vaccination or undergo weekly testing, wear face coverings and maintain social distancing protocols when working outside of their home. Job descriptions and other communications will be updated to reflect this accordingly.

Can I change my work style based on this decision?

Work style decisions should be based off of job requirements and personal preference. If your job requirements have changed, that could have an impact on your selected work style. If the testing option changes your personal preference, please discuss with your leader.

I read that the OSHA ETS was temporarily stayed by a Federal Court and is currently not enforceable. Why are you making this change now?

Regardless of the technical legal issues involved in its passage, OSHA has recognized that while vaccination is preferred, a safe work environment can exist with weekly testing and masking of unvaccinated associates. Humana therefore adjusted its policy to acknowledge this recognition.

Can I ask another associate if they have been vaccinated?

While you may ask another associate directly about his/her/their status, to avoid inadvertently delving into confidential medical information you may not inquire into the reasons why an associate may not be vaccinated.