

# Privacy and Civil Liberties Impact Assessment



Privacy and Civil Liberties Impact Assessment  
for

## **Treasury's Collection, Use, and Disclosure of Employee/Onboarding Employees' Vaccination Status and Proof of Vaccination Information**

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### **Reviewing Official**

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**Introduction** This Privacy and Civil Liberties Impact Assessment (PCLIA) covers the Department of the Treasury’s (“Treasury” or “the Department”) departmentwide collection, use, and disclosure of vaccination status information and proof of vaccination records submitted by employees and individuals who accepted positions with Treasury after the issuance of EO 14043, but will not onboard prior to November 22, 2021 (collectively “employee” unless distinction is required). Rather than using the standard Treasury PCLIA template, this PCLIA is presented in a modified “question and answer” (Q&A) format to directly address questions employees may have about Treasury’s collection, use, and disclosure of their vaccination information/records.

***What is a Privacy and Civil Liberties Impact Assessment (PCLIA)?***

Treasury uses PCLIA’s to:

- Identify privacy and civil liberties risks and methods to minimize those risks
- Ensure that programs or information systems meet legal, regulatory, and policy requirements; and
- Tell the public how Treasury protects PII when it is collected, shared, stored, transmitted, and used.

**I. Executive Order 14043 Requirements**

On September 9, 2021, President Biden signed Executive Order (EO) 14043, titled, [“Requiring Coronavirus Disease 2019 Vaccination for Federal Employees.”](#) The President determined that it was necessary for all Federal agencies to require COVID–19 vaccination for Federal employees covered by EO 14043. The purpose of this requirement was to promote the health and safety of the workforce and the efficiency of the civil service, subject only to such exceptions required by law.

***By what date are Treasury employees required to comply with this requirement?***

EO 14043 requires Federal employees to be fully vaccinated by November 22, 2021.

***Which vaccines meet the EO 14043 requirements?***

As of November 24, 2021, the following has been approved by the U.S. Food and Drug Administration (FDA): Pfizer/BioNTech.

As of November 24, 2021, the following vaccines have been authorized for emergency use by the FDA: Moderna and Johnson & Johnson/Janssen.

As of November 24, 2021, the following vaccine has been authorized for emergency use by World Health Organization (WHO): AstraZeneca.

***What does “fully vaccinated” mean?***

Employees are fully vaccinated for COVID-19 two weeks after they receive the requisite number of doses of a COVID-19 vaccine approved or authorized for emergency use by the FDA or a vaccine that has been listed for emergency use by the WHO.

***What are the requisite number of doses for each vaccine?***

The following are two-dose vaccines: Pfizer-BioNTech, Moderna, and AstraZeneca/Oxford. An employee achieves full vaccination two weeks after the second shot of these vaccines.

The following is a one-dose vaccine: Johnson and Johnson (J&J)/Janssen. An employee achieves full vaccination two weeks after the first (and only) dose of this vaccine.

***By what date must an employee receive their last dose of each vaccine?***

Employees must receive the last dose (the only dose if J&J/Janssen) of their vaccine no later than November 8, 2021 to meet the November 22, 2021 deadline.

## **II. Scope of the vaccination status/proof requirement**

***Does the vaccination status/proof requirement apply to Federal employees who are not reporting to the worksite (e.g., are on maximum telework or working remotely)?***

All Federal employees covered by EO 14043, including those who are currently on maximum telework or working remotely (not reporting to the worksite) are required to be fully vaccinated and provide documentation proving vaccination by November 22, 2021.

***How do the vaccination/proof requirements apply to individuals who accepted positions with Treasury after the issuance of EO 14043 if they will not onboard prior to November 22, 2021?***

Treasury requires that individuals who start their government service prior to November 22, 2021 must be [fully vaccinated](#) by November 22, 2021, except in limited circumstances where an accommodation is legally required or a mission-critical hiring need can be shown.

***If a Treasury bureau or office establishes a mission-critical hiring need to onboard new staff who cannot be fully vaccinated by November 22, 2021, how long will new hires have to submit their proof of full vaccination?***

If a Treasury bureau or office has an urgent, mission-critical hiring need to onboard new staff who cannot be [fully vaccinated](#) by November 22, 2021, the agency head may delay the vaccination requirement—in the case of such limited delays, Treasury will require new hires to be fully vaccinated within 60 days of their start date and to follow safety protocols for not fully vaccinated individuals until they are fully vaccinated.

Please refer to [Frequently Asked Questions, Vaccination Requirement for Federal Employees](#) for additional guidance.

## **III. Collection of vaccination information/proof of vaccination**

***Are there any restrictions on what vaccination information/proof of vaccination information Treasury may collect?***

The Privacy Act requires “each agency that maintains a system of records [to] maintain in its records only such information about an individual as is relevant and necessary to accomplish a purpose of the agency required to be accomplished by statute or by executive order of the President.” 5 U.S.C. § 552a (e)(1). Treasury is only collecting vaccination information/proof of vaccination information allowed by EO 14043.

***Are employees required to submit documentation to prove that they are fully vaccinated?***

By November 22, 2021, employees are required to submit documentation to prove that they are fully vaccinated.

***What data fields must be present in documentation provided as proof of full vaccination?***

Acceptable proof of vaccination is any official documentation that includes the following data fields:

- Employee full name (first, middle name (or initial), and last name),
- Type of vaccine administered (Pfizer/BioNTech, Moderna, Johnson and Johnson/Jansen, and AstraZeneca),
- Date(s) of administration, and
- Name of the health care professional(s) or clinic site(s) administering the vaccine(s).

***What types of official documentation are acceptable?***

By November 22, 2021, Employees must submit a copy of any one of the following documents containing the required information:

- A record of immunization from a healthcare provider or pharmacy,
- Center for Disease Control (CDC) COVID-19 Vaccination Record Card,
- Medical records documenting the vaccination,
- Immunization records from a public health or state immunization information system, or
- Any other official documentation containing the required data points.

***Is a particular digital format required for uploading/proving vaccination status?***

Treasury employees may provide a digital copy of their vaccination record(s), including, for example, a digital photograph, scanned image, or PDF of such a record that clearly and legibly displays the required information.

***How can employees transfer paper records to digital format?***

Most individuals vaccinated in the United States received a paper CDC COVID-19 Vaccination Record Card. Alternatively, they may have received a paper record of immunization. Any record must include the required data points: type of vaccine, dates of administration, and name of the health care professional or clinic site that administered the dose(s). Employees should not alter the form but may redact (blacken out) other Personally Identifiable Information or medical information displayed on it that is not one of the three required data fields (for example, employees may redact their social security number, patient identification number, or date of birth).

Employees may be able to digitize a copy of their paper proof of vaccination by:

- Using an office scanner or multi-function copier (MFC) with scanning capability. When using a shared scanner/MFC, employees should be sure to take appropriate steps to safeguard their personal information.
- Taking a picture of the document using a government-issued smart phone or tablet and emailing it to your official email address.
- Taking a picture of the document using a web camera attached to/built into a government-issued computer.
- Using a personal device to scan/take a picture of the document and securely email it to their government-issued device.

Please refer to [Frequently Asked Questions, Vaccination Requirement for Federal Employees](#) for additional guidance.

#### **IV. Ensuring authenticity of proof of vaccination documentation**

*How will Treasury ensure the authenticity of the documentation provided?*

On the Human Resources Connect (HRConnect) website where the data is collected, employees are required to attest that they understand that a knowing and willful false statement in information provided to prove vaccination can be punished by fine or imprisonment or both (18 U.S.C. 1001). Employees also must attest that they understand that making false statements on the form can lead to additional administrative action, including an adverse personnel action up to and including removal from their position. The documents submitted will also be reviewed by a panel of representatives from the relevant bureau or office.

*If a Treasury employee already provided information regarding their vaccination status (e.g., in HRConnect or via a bureau process), is anything else required?*

Fully vaccinated Treasury employees who already provided their vaccination type and the date of last dose required (depending on the vaccine received) prior to the issuance of EO 14043 are only required to provide documentation supporting the information provided earlier. These employees must also ensure that their information remains current (e.g., if they get a booster or other updates are required).

Employees who visited the HRConnect vaccination site prior to the issuance of EO 14043 and stated they were unvaccinated or declined to answer the questions must complete all required fields and provide the required documentation.

All employees are required to keep their information on the site current.

*If a Treasury employee already attested to their vaccination status earlier (prior to the vaccine/proof of vaccination mandate), why do they need to provide documentation and attestation again?*

Proof of vaccination status is now required even if an employee previously attested to their vaccination status within HRConnect or via a bureau-required process. EO 14043 also requires that Treasury employees certify under penalty of perjury that the documentation they are submitting is true and correct. The Attestation (which does not require certification under penalty of perjury) is no longer sufficient to meet the vaccination status reporting requirement. On the HRConnect website where the data is collected, employees are now (but were not previously) required to attest that they understand that a knowing and willful false statement in information provided to prove vaccination can be punished by fine or imprisonment or both (18 U.S.C. 1001). Employees also must attest that they understand that making false statements on the form can lead to additional administrative action, including an adverse personnel action up to and including removal from their position. The documents submitted will also be reviewed by a panel of representatives from the relevant bureau or office.

#### **V. Limiting the personally identifiable information employees submit**

*Is one of the required types of official documentation preferred over others?*

All forms of official documentation are acceptable if they contain the required data fields. If, however, employees have more than one of these documents available, they should provide the document that includes the least amount of personally identifiable information in addition to the three required data fields.

***If an employee only has access to documentation that includes other personally identifiable/medical information, in addition to the required data fields, what should the employee do?***

The employee may redact/blacken out with a marker any additional data fields before copying/submitting the document.

## **VI. Legal authority and issues**

***On what legal authority does Treasury rely to collect vaccination status information and proof of vaccination records?***

On September 9, 2021, the President issued EO 14043, [Requiring Coronavirus Disease 2019 Vaccination for Federal Employees](#). This EO requires COVID-19 vaccination for Federal executive branch employees (as defined in 5 U.S.C. 2105), except in limited circumstances where a reasonable accommodation is legally required.

### **a. Title II of Genetic Information Nondiscrimination Act (GINA)**

***Is Title II of [GINA](#) implicated when an employer requires employees to provide proof that they have received a COVID-19 vaccination?***

Requiring employees to provide proof that they received a COVID-19 vaccination does not implicate Title II of GINA, because it does not involve the use of genetic information to make employment decisions, or the acquisition or disclosure of “genetic information” as defined by the statute.

***Under GINA, can agencies ask employees if their family members were vaccinated***

GINA does prohibit employers from asking employees medical questions about family members.

***Does inquiring about an employee’s vaccine status for a valid business purpose violate discrimination laws?***

Inquiring about an employee’s vaccine status for business purposes does not likely implicate discriminatory issues. To avoid implicating the Rehabilitation Act of 1973 and other issues, EEOC recommends that supervisors avoid asking further questions that elaborate on why the employee chose not to receive the vaccine, because such questions could elicit information about health or disability.

***Under the Rehabilitation Act of 1973, Title VII, and other Federal employment nondiscrimination laws, may an employer require all employees physically entering the workplace to be vaccinated for COVID-19?***

According to [the Rehabilitation Act of 1973 and other EEO laws \(EEOC Technical Assistance\)](#) guidance, Federal EEO laws do not prevent an employer from requiring all employees physically entering the workplace to be vaccinated for COVID-19. Employers are, however, subject to the reasonable accommodation provisions of Title VII and the Rehabilitation Act of 1973 and other EEO considerations.

***Are there any EEO impediments to agencies requiring employees to be vaccinated before returning to the workplace?***

After the White House required vaccines for all Federal employees, the EEOC issued guidance that allows employers to require employees, even outside of certain essential and/or healthcare related occupations, to get vaccinated against COVID-19 before returning to the workplace.

**b. The Rehabilitation Act of 1973**

***Under the Rehabilitation Act of 1973, may an employer require a COVID-19 vaccination for all employees entering the workplace, even though it knows that some employees may be unable to get a vaccine because of a disability?***

Under the Rehabilitation Act of 1973, Treasury may require an individual with a disability to meet a qualification standard applied to all employees, such as a safety-related standard requiring COVID-19 vaccination if the standard is job-related and consistent with business necessity. If a particular employee cannot meet such a safety-related qualification standard because of a disability, Treasury will not require compliance for that employee unless evidence exists showing that the individual would pose a “direct threat” to the health or safety of the employee or others in the workplace.

***Under the Rehabilitation Act of 1973, if an agency requires COVID-19 vaccinations for employees physically entering the workplace, how should an employee who does not get a COVID-19 vaccination because of a disability inform the employer?***

An employee with a disability who does not get vaccinated for COVID-19 because of a disability must let Treasury know that he/she needs an exemption from the vaccination requirement, or a workplace modification known as a reasonable accommodation.

***Are there any “magic words” an employee must use to request an accommodation?***

When requesting a reasonable accommodation, an individual does not need to mention the Rehabilitation Act of 1973 or use the term “reasonable accommodation.”

***How does the reasonable accommodations request process work for accommodations that will be required only after the employee returns to work in a Treasury facility?***

Treasury may inform the workforce that employees with disabilities may request accommodations in advance that they believe they may need when the workplace re-opens. If advance requests are received, Treasury may begin the “interactive process” – the discussion between the employer and employee focused on whether the impairment is a disability and the reasons that an accommodation is needed. If an employee chooses not to request accommodation in advance, and instead requests it at a later time, Treasury must still consider the request at that time.

***Is medical documentation required to support a request for an accommodation?***

Medical documentation is not required to request an accommodation; however, a determination may be made during the accommodations process that it is necessary to obtain supporting medical documentation regarding the employee’s disability.

***Are there any resources available to assist employers and employees in their discussion about accommodations?***

Employees may find it helpful to educate themselves on the [Job Accommodation Network](#) (JAN) website as a resource for different types of accommodations. Treasury also may consult applicable [Occupational Safety and Health Administration](#) (OSHA) COVID-specific resources.

**c. Title VII of the Civil Rights Act: Sincerely Held Religious Belief, Practice or Observance**

*Can an employee indicate that he or she is unable to receive a COVID-19 vaccination because of a sincerely held religious belief, practice, or observance?*

Under Title VII, employees may seek an exception to the vaccination requirement based on “a sincerely held religious belief, practice, or observance.” If a sincerely held religious belief, practice, or observance is submitted, an employer typically provides an accommodation, unless providing the accommodation would pose an “undue hardship.”

*What is an “undue hardship”?*

Courts have defined “undue hardship” under Title VII as having more than a de minimis cost or burden on the employer.

**VII. Adverse actions and employee rights**

*Will Treasury pursue any adverse action against an employee if they refuse to be vaccinated and/or provide proof of vaccination?*

In the absence of a legally-required accommodation, if an employee refuses to be vaccinated and/or provide proof of vaccination, Treasury will pursue disciplinary measures, up to and including removal from Federal service. Employees covered by EO 14043 who fail to comply with a requirement to be fully vaccinated or provide proof of vaccination and have neither received an exception nor have an exception request under consideration, are in violation of a lawful order. Employees who violate lawful orders are subject to discipline, up to and including termination or removal.

*Will Treasury pursue any adverse action against an employee if the employee submits false proof of vaccination documentation under penalty of perjury?*

If an employee submits false proof of vaccination documentation under penalty of perjury, Treasury will pursue disciplinary measures, up to and including removal from Federal service. Treasury may also take additional action as allowed by law.

*What rights will an employee have if Treasury pursues adverse action?*

In pursuing any adverse action, Treasury will provide the required procedural rights to an employee and follow normal processes, including any Treasury policies or collective bargaining agreement requirements concerning disciplinary matters. Employees will not be placed on administrative leave while pursuing an adverse action for refusal to be vaccinated but will be required to follow safety protocols for employees who are not fully vaccinated when reporting to agency worksites.

**VIII. Use of Vaccination Status and Proof of Vaccination Status Information**

*What information should not be included when tracking vaccine status within the agency?*



It would be best not to include on the list any personally identifiable information (PII) that is not necessary for tracking; for example, when an employee declines a vaccination for health reasons, the list should not identify or describe the health condition or other personal information provided by the employee.

***How will Treasury maintain and ensure the confidentiality of these vaccination status tracking lists?***

Treasury will maintain tracking lists in secure administrative or management files only accessible to Treasury Personnel who have a “need to know” that information to perform their official Treasury duties.

## **IX. Compliance with privacy, security, records management requirements**

***What laws govern Treasury’s collection, use, and disclosure of vaccination status records?***

When collecting, using, and disclosing vaccination status and proof of vaccination status information, Treasury is required to comply with all applicable Federal laws, including requirements under the Privacy Act of 1974 and the Rehabilitation Act of 1973.

***How long will Treasury maintain vaccination status and proof of vaccination status information?***

Treasury will maintain vaccination status and proof of vaccination status information in accordance with National Archives and Records Administration (NARA) General Records Schedule 2.7 Item 040, [Employee Health and Safety Records](#).

***Does the Paperwork Reduction Act (PRA) apply to Treasury’s collection of vaccination status and proof of vaccination status information collected from Federal employees?***

The PRA does not apply to the collection of information from Federal employees.

***What privacy requirements apply to the collection of vaccination status and proof of vaccination status information?***

Treasury is required to draft a system of records notice (SORN), a Privacy Act statement (PAS), and a Privacy and Civil Liberties Impact Assessment (PCLIA).

***On what Privacy Act system of records notice does Treasury rely to collect vaccination status and proof of vaccination status information?***

Department of the Treasury System of Records Notice .020 - Health Screening and Contact Tracing Records. 86 Fed.Reg. 35, at 11381 (Feb. 24, 2021).

***On what Privacy Act system of records notice does Treasury rely to collect information related to disabilities and reasonable accommodations requested or granted under the Rehabilitation Act, the Religious Freedom Restoration Act of 1993 and/or Title VII of the Civil Rights Act of 1964?***

Treasury maintains .016 - Reasonable Accommodations Records System of Records, which allows Treasury, its bureaus, and offices to collect and maintain records on:

“Applicants for employment who have disabilities; Individuals who seek accommodations to perform the essential functions of their job; Individuals with disabilities to facilitate

their participation in a Treasury program or activity, including their attendance at a meeting, training, conference or other Treasury-sponsored event at either a Treasury facility or outside Treasury or Treasury-sponsored event by Treasury; applicants for employment who have disabilities; employees who seek accommodations to allow them to perform the essential functions of their job; and employees with disabilities who request or receive reasonable accommodation as required by the Department as the Rehabilitation Act of 1973 and the Americans with Disabilities Act, as amended by the Americans with Disabilities Amendment Act of 2008 (ADAAA); individuals who receive accommodations under the Family Medical Leave Act, and individuals who receive accommodations under the Religious Freedom Restoration Act of 1993 and/or Title VII of the Civil Rights Act of 1964 require.”

***When Treasury collects vaccination status and proof of vaccination status information in HRConnect, will employees receive a Privacy Act Statement (PAS) as required by the Privacy Act?***

At all points (and places) where Treasury, its bureaus, and offices collect vaccination status and proof of vaccination status information, Treasury provides employees with a PAS.

***What is in the PAS?***

The actual content of the Departmental PAS, located at the points at which Treasury collects vaccination status and proof of vaccination status information, is as follows:

**Privacy Act Statement**

**Authority:** Solicitation of this information is authorized by Occupational Safety and Health Act (OSHA) of 1970, Public Law 91-596, Section 19(a) (29 U.S.C. 668(a)); 5 U.S.C. 301; Medical Examinations for Fitness for Duty Requirements, including 5 CFR part 339; Executive Order 12196, 5 U.S.C. 7902(d); 29 U.S.C. 668, 29 CFR part 1904, 29 CFR 1910.1020, 29 CFR 1960.66; Executive Order 14042, Ensuring Adequate COVID Safety Protocols for Federal Contractors (September 09, 2021); Executive Order 14043, Requiring Coronavirus Disease 2019 Vaccination for Federal Employees (September 09, 2021); Executive Order 12107, Relating to the Civil Service Commission and labor-management in the Federal service (December 28, 1978); Executive Order 12564, Toward a Drug-Free Federal Workforce (September 15, 1986); and 5 U.S.C. chapters 11, 33, 63, and 79.

**Purpose:** The Department of the Treasury (“Treasury” or the “Department”) is collecting this information to promote the safety of Federal buildings and the Federal workforce consistent with the above-referenced authorities, the COVID-19 Workplace Safety: Agency Model Safety Principles established by the Safer Federal Workforce Task Force, and guidance from Centers for Disease Control and Prevention and the Occupational Safety and Health Administration.

**Routine Uses:** While the information requested on this form is intended to be used primarily for internal purposes, in certain circumstances Treasury may be required to disclose this information externally in accordance with the routine uses outlined in .020, Department of the Treasury - Health Screening and Contact Tracing Records, available at 86 FR 11381 (Feb. 24, 2021).

**Disclosure:** Providing your vaccination status information (including vaccination type, date of last vaccination, and proof of vaccination) is mandatory. Your access to Treasury buildings and or managed properties could be denied for failure to provide the required information. Employees who refuse to provide proof of vaccination by the required dates may also be terminated from employment.

***Are Federal agencies required to apply any special protections to vaccination status and proof of vaccination status information?***

Vaccination status and proof of vaccination status information constitute “Confidential Medical Information” (CMI) as defined in the Rehabilitation Act of 1973. There are special requirements that apply to CMI (see next question).

***Are there any special protections applied to information employees provide to the Office of Civil Rights and Diversity (OCRD) or the Bureau’s Reasonable Accommodation Coordinator in support of a request for a reasonable accommodation/exception to vaccination requirements due to a disability?***

Information provided in support of a reasonable accommodation request for an accommodation due to a disability covered by the Rehabilitation Act of 1973 is also treated as CMI.

***How are Treasury supervisors reminded of their responsibilities when they need to access and use CMI for official Treasury purposes?***

There is a warning banner that will appear on the page where supervisors access information limited to vaccination status information and records (no records in support of requests for exceptions to the vaccination requirements because of disabilities or religious beliefs, observances, or practices (which are stored at OCRD or at the Bureau Reasonable Accommodation Office only and are not shared with supervisors)). See warning banner language below:

**“The information on this page constitutes Confidential Medical Information (CMI) that is restricted under the Americans With Disabilities Act. CMI: (1) must be kept confidential whether or not it relates to a disability; (2) must be kept separate from other personnel records (but may be maintained with the employee’s other medical records); and (3) may not be maintained in folders or on other recording media (including notepads, laptops, or other devices) where it can be accessed or viewed by others who lack a need to know. Supervisors may use CMI to report to appropriate agency officials so the agency can take appropriate actions and ensure compliance with guidance and safety protocols issued by the Center for Disease Control (CDC) and other public health authorities and to implement relevant federal law, regulations, and executive orders. Supervisors must ensure prior to disclosure that internal recipients of CMI have a need to know. All external disclosures must comply with the Privacy Act of 1974, including the routine uses in Treasury .020 - [Health Screening and Contact Tracing Records](#). For all internal and external disclosures, care must be taken to omit information that may identify the individuals about whom the CMI is maintained where identification is not required. Reasonable effort must be made to limit the number of people who know the name of the employee associated with the CMI. Unauthorized or improper access and/or use of the vaccination records maintained in this system is prohibited and may result in civil and criminal penalties pursuant to [5 U.S.C. § 552a\(i\)\(1\)-\(3\)](#).”**

***Are there any special protections applied to information provided to OCRD or the Bureau Reasonable Accommodation Coordinator in support of a request for an exception to vaccination requirements because of religious beliefs, observances, or practices?***

Under the Privacy Act, 5 USC Section 552a, Federal agencies typically cannot collect information from individuals about how they exercise their First Amendment rights, including how they exercise their right to religious freedom. An exception exists when the individual voluntarily provides the information to obtain a benefit or service from the government (or, in this case, an exception to a requirement). Information provided to OCRD or to the Bureau Reasonable Accommodation Coordinator in support of a request for an exception to vaccination requirements because of religious beliefs, observances, or practices under the Religious Freedom Restoration Act of 1993 and/or Title VII of the Civil Rights Act of 1964 is protected under the security and privacy requirements in the Privacy Act.

## **X. Ensuring the accuracy of vaccination information maintained**

*How does Treasury maintain the accuracy of vaccination status information employees provide?*

Employees are required to keep their vaccination status information current (including providing updated supporting documentation), including any vaccination boosters received (so Treasury can continue to monitor compliance with evolving CDC guidance).

*Are there penalties for providing false information on the vaccination attestation form?*

Federal employees who make a false statement on the Certification of Vaccination form could be subject to an adverse personnel action, up to and including removal from their position. It is also a federal crime (18 U.S.C. § 1001) for anyone to provide false information on the form. Falsification could also affect continuing eligibility for access to classified information or for employment in a national security position under applicable adjudicative guidelines.

*Will Treasury take any adverse action against an employee without first giving them an opportunity to update their vaccination status information and documentation to meet the requirements?*

No adverse action will be taken against an employee without first giving them an opportunity to update their vaccination status information and documentation to reflect actual compliance with the requirements.

**Responsible Officials**  
**Approval Signature**

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