

Mandatory Student COVID-19 Vaccination Policy

In the midst of the COVID-19 pandemic, Adtalem Global Education and Ross University School of Medicine (RUSM) want to assure you of their continued commitment to maintaining a safe and healthy educational environment. We are taking additional measures to protect you, your classmates, and your families from contracting and spreading COVID-19 by implementing a mandatory vaccination policy, subject to the exemptions in this policy (explained below).

This policy is based on guidance from the Centers for Disease Control and Prevention (CDC), the World Health Organization (WHO), and other local administrative or governmental agencies and ministries, and is designed to comply with all applicable laws.

Compliance with this policy may be a condition of your initial or continued enrollment. Please read this policy carefully.

Vaccination Requirements

Consistent with the CDC and WHO's guidance, to prevent the infection and spread of COVID19, and as an integral part of its public health and safety measures, RUSM requires that all students be fully vaccinated against COVID-19 by **September 30, 2021**. A person is considered fully vaccinated two weeks after having all doses of a vaccine (including 2 doses for PfizerBioNTech, Oxford-AstraZeneca, Moderna, Sinopharm-BBIBP, and CoronaVac; 1 dose for Johnson & Johnson).

Students who choose not to meet this COVID-19 vaccine requirement and do not receive an exemption may be barred from entering the campus, utilizing student housing, attending or participating in University sponsored activities, and/or beginning their clinical rotation or clinical practicum (subject to reasonable accommodation and other requirements of applicable federal, state, and local law)¹. RUSM also reserves the right to remove a student's registration for classes, and facilitate a withdrawal or dismissal for noncompliance with this policy.

Policy Compliance

By **September 30, 2021**, students are required to meet the COVID-19 vaccination requirement and submit proof of vaccination via the SafeApp, as explained in the Proof of Vaccination section below.

Any medical sciences student who, by September 30, 2021, fails to meet the above requirements and (i) has not received an approved exemption or accommodation from the vaccination requirement, (ii) does not have an accommodation or exemption request pending (and state such in the Safe App), or (iii) is not awaiting review and approval of submitted vaccination records, may have a registration hold placed on their account. Please note that a reduction in enrolled hours may affect financial aid eligibility and/or awards. Any medical sciences student who thereafter becomes compliant with the vaccination policy, including receiving an accommodation or exemption, prior to the start of the spring semester on January

¹ Students will not be barred from attending or participating in University sponsored activities if RUSM has specifically exempted the activity from the vaccination requirement.

10, 2022, will be eligible to enroll for the January 2022 semester and receive financial aid in accordance with existing policy. Any student who still has a registration hold on their account at the start of the spring semester on January 10, 2022 may receive an Approved Absence (AA) as defined in the 2 RUSM Student Handbook. Any student on an AA, who thereafter becomes compliant with the vaccination policy, including receiving an accommodation or exemption, after the start of the January semester, but before the start of the May 2022 semester will be eligible for medical sciences registration at RUSM in May 2022 in accordance with existing policy.

Any clinical sciences student who, by September 30, 2021, fails to meet the above requirements and (i) has not received an approved exemption or accommodation from the vaccination requirement, (ii) does not have an accommodation or exemption request pending (and state such in the Safe App), or (iii) is not awaiting review and approval of submitted vaccination records may have all rotations beginning January 1, 2022 or later removed from their schedule and a registration hold placed on their account. This may result in a reduction in enrolled hours. Please note that a reduction in enrolled hours may affect financial aid eligibility and/or awards during the January (Spring) 2022 semester. Any clinical sciences student who, after September 30, 2021, becomes compliant with the vaccination policy, including receiving an accommodation or exemption, prior to the January 1, 2022 semester will be eligible to schedule clinical rotations and receive financial aid so long as they are compliant with other policies required for clinical registration in accordance with existing policy. Any student who still has a registration hold on their account at the start of the spring semester on January 10, 2022 may be placed in a Temporary Withdrawal status as defined in the RUSM Student Handbook. Any student in a Temporary Withdrawal status, who thereafter becomes compliant with the vaccination policy, including receiving an accommodation or exemption, including receiving an accommodation or exemption, after the start of the January semester, but before the start of the May 2022 semester will be eligible for clinical sciences registration at RUSM will be eligible to schedule clinical rotations and receive financial aid during the remaining weeks of the January 2022 semester and the entirety of future semesters so long as they are compliant with other policies required for clinical registration in accordance with existing policy.

Any student who is currently on an Approved Absence (AA) or any non-active status including but not limited to: Temporary Withdrawal (TW), Inactive Status (IS), or Suspension (SU) as defined in the RUSM Student Handbook and by September 30, 2021 fails to meet the above requirements and (i) has not received an approved exemption or accommodation from the vaccination requirement, (ii) does not have an accommodation or exemption request pending (and state such in the Safe App), or (iii) is not awaiting review and approval of submitted vaccination records, may have a registration hold placed on their account. Any student who was on an Approved Absence or non-active status who thereafter becomes compliant with the vaccination policy, including receiving an accommodation or exemption, prior to the January 2022 semester will be eligible to come out of their AA or non-active status in accordance with existing policy. Any student who is placed in an AA or TW status during the January 2022 semester due to vaccine non-compliance as outlined above, and on the last day of the January 2022 semester is on that status due only to vaccine non-compliance, may be Administratively Withdrawn from the University before the first day of the May (Summer) 2022 semester.

Vaccine Administration

You are responsible for scheduling and obtaining all recommended doses of an FDA or WHO approved or EUA-approved COVID-19 vaccine. In the event you are unable to obtain the

vaccine due to your physical location or health/religious reasons, you will need to follow the Accommodation and Exemption Request Process outlined below.

Proof of Vaccination

Where permitted by local law (exceptions noted in attached chart), you must provide proof of vaccination from the vaccine administrator or a CDC-issued vaccination card including the vaccination place, date(s), and name, by the date communicated by your institution via the Safe App. In locations where mandated disclosure is not permitted, you may volunteer to provide written proof of vaccination as prescribed above; if you choose not to volunteer such written proof, you will be required to wear a mask while on campus and to otherwise adhere to all other COVID-19 safety measures, as communicated by Adtalem and RUSM. Do not include any medical or genetic information with your proof of vaccination. Adtalem and RUSM will keep your vaccination information confidential, consistent with applicable laws.

Accommodation and Exemption Requests

Disability Accommodation

In accordance with RUSM's disability accommodation policy, RUSM provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to participate in their educational program. Reasonable accommodation may include appropriate adjustment or modifications of policies, including this Mandatory Vaccination Policy.

If you believe you need an accommodation regarding this policy because of a disability, you are responsible for requesting a reasonable accommodation from the institution or program's disability services provider. The Office of Student Disability Services can be reached at rusmosds@adtalem.com or 855.229.0848 to begin the request process. Please note that documentation will be required as part of the process.

Religious Accommodation

Adtalem Global Education and its institutions provide reasonable accommodations to students with sincerely held religious beliefs, observances or practices that conflict with getting vaccinated or receiving the type of vaccine currently available.

If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for requesting a reasonable accommodation from the Office of Equity and Access at equity@adtalem.com.

Exemption for Access Reasons

Exemptions for students who are unable to access the vaccine may be available on a case-by-case basis. Students requesting an exemption are required to provide supporting documentation outlining why their circumstances prevent them from obtaining a vaccine. For exemption requests not related to health conditions or religious reasons, students are required to upload a personal statement explaining their lack of access, along with the exemption form. Students receiving a vaccination exemption may be required to participate in increased levels of COVID19 testing, masking and quarantine/isolation procedures.

Adtalem and its institutions may request additional documentation supporting the need for an accommodation or request for any other exemption. Adtalem and its institutions will maintain

confidentiality with any medical information obtained in connection with your request for a reasonable accommodation or other exemption. However, we ask that you not provide any genetic information when responding to a request for additional information or providing proof of vaccination in compliance with this policy.

Determinations

Adtalem and its institutions make determinations about requested accommodations and exemptions on a case-by-case basis considering various factors and based on an individualized assessment in each situation. Adtalem and its institutions strive to make these determinations expeditiously and in a fair and nondiscriminatory manner and will inform you after we make a determination. Access Exemption determinations are final, conclusive, and binding.

Continued Applicability of Other Infection Control Policies and Protocols

This Mandatory Vaccination Policy is a key part of our overall strategy and commitment to maintaining a safe and healthy educational environment in light of the COVID-19 pandemic. This policy is designed for use together with, and not as a substitute for, other COVID-19 prevention measures.

However, fully vaccinated individuals may be excused from complying with certain COVID-19 prevention measures, such as face mask or social distancing requirements. For more on those excused requirements, if any, refer to the institution's communications regarding COVID-19 prevention measures.

We need your full cooperation and compliance with this and other health and safety protocols to make them effective.

Policy Modification

Government and public health guidelines, restrictions and best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available and further research is conducted. Adtalem and RUSM reserve the right to modify this policy at any time in their sole discretion to adapt to changing circumstances and safety concerns, consistent with its commitment to maintaining a safe and healthy educational environment.