



**Via E-mail**

**Q-161**

**August 13, 2021**

**TO:** All CWA Locals with legacy Qwest Members

**FROM:** Susie McAllister, Assistant to the Vice President  
Lisa Avila, Administrative Director to the Vice President

**SUBJECT:** Lumen's COVID Vaccination Reporting Policy

The Company announced that they will require all employees to report their COVID vaccination status. We are currently in discussions with the Company over this decision. The number one question we have received is if this is a HIPAA violation. Our legal counsel has confirmed that an employee reporting their individual status is not a violation of HIPAA. While vaccination status is considered protected health information (PHI), an employee is permitted to share such information with their employer. An employer cannot get this information from a medical provider without an employee's consent, but they can get it directly from the employee.

As we move forward meeting with the Company please forward your questions and concerns for us to get answered.

The Company has not made the decision regarding mandatory vaccinations. The Company is well aware that we will want to enter into effects bargaining over any mandatory vaccination policy. Part of the collection of the vaccination data is to help determine if they will be issuing a mandatory vaccination policy.

SM/er opeiu30, afl-cio

c: CWA District 7 Staff