

Document Title: COVID-19 Vaccination Policy

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Document Owner: Vaccine Exemption Committee

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Policy: Consistent with federal law, team members and other individuals affiliated with {De-Identified} (the {De-Identified}) must be fully vaccinated against the virus that causes coronavirus disease 2019 (“COVID-19”) unless the individual is exempt from such vaccination pursuant to a state or federal law (“Approved Exemption”). Unless an Approved Exemption has been obtained, Team Members who choose not to receive the COVID-19 vaccine will be deemed to have voluntarily resigned their employment with the {De-Identified}. Other Personnel without an Approved Exemption will be prohibited from entering {De-Identified} campuses and facilities for their contracting, training or volunteer work.

Scope: This policy shall apply to all {De-Identified} Team Members, students, trainees, and volunteers; and individuals who provide care, treatment, or other services for the {De-Identified} and/or its patients, under contract or other arrangement (collectively, “Personnel”) who are not exempted from COVID-19 vaccination pursuant to a state or federal law. Members of the {De-Identified} medical staff that are not employees of the {De-Identified} are subject to the COVID-19 Vaccination Policy for the applicable medical staff or {De-Identified}.

This policy does not apply to patients, visitors or tenants of any {De-Identified} premises who are not otherwise required to be vaccinated under this policy.

Definitions:

1. “Fully vaccinated against COVID-19” means that an individual has completed the primary vaccination series described on the vaccine manufacturer’s fact sheet or vaccine information sheet. What it means to be “fully vaccinated against COVID-19” may change over time and may vary based on factors such as the brand of vaccine.
2. “Proof” in the context of proof of vaccination means (i) a legible photocopy or photograph of an official CDC COVID-19 Vaccination Record Card; (ii) documentation of vaccination from a healthcare provider or electronic health record print out; or (iii) information from a state’s official immunization information system.
3. “Team Member” means an employee of the {De-Identified} or its affiliates.

Procedure:

- A. General Information.

1. Evidence that a person is fully vaccinated against COVID-19 is required as a condition of employment at the {De-Identified} and as a condition to work, volunteer, or train at the {De-Identified}.
2. All Personnel are responsible for personal compliance with this policy. Department managers are responsible for assuring all Personnel working within their department comply with this policy and for taking appropriate action when Personnel are non-compliant.
 - a. All Personnel who will enter one of the {De-Identified}'s facilities for a work, training, or volunteer purpose **on or after December 5, 2021**, must provide proof they have received **at least the first dose of a primary COVID-19 vaccination series by December 4, 2021**.
 - b. All Personnel who will enter one of the {De-Identified}'s facilities for a work, training, or volunteer purpose **on or after January 4, 2022**, must provide proof they have **completed a primary COVID-19 vaccination series by January 3, 2022**.
 - c. All new Personnel who start working at the {De-Identified} on or after December 6, 2021, must have either received (i) the first dose of multi-dose COVID-19 vaccination series; or (ii) the only dose of a single-dose vaccination series, **by their first day at the {De-Identified}**. If the Personnel chose to receive the first dose of multi-dose COVID-19 vaccination series, then they must also receive the second dose **by January 3, 2022**.
 - d. All new Personnel who start working at the {De-Identified} on or after January 4, 2022, must have fully completed a primary COVID-19 vaccination series **by their first day at the {De-Identified}**.
 - e. If a Team Member is non-compliant with this policy by the deadlines provided above, the Team Member will be placed on unpaid administrative leave for up to fourteen calendar days to be given the opportunity to become compliant. Paid Time Off ("PTO") may not be used during this administrative leave. The Team Member may return to work once he or she is compliant. If, after this fourteen-day period, the Team Member is still not compliant, the Team Member will be deemed to have voluntarily resigned their employment. If a non-Team Member is not compliant, he or she may not provide care, treatment, or other services to the {De-Identified} or its patients.
3. The {De-Identified} will provide COVID-19 vaccines to Team Members free of charge. Team Members may receive these vaccines at the location of their choice. To the extent Team Members are uninsured, their health insurance does not cover the full cost of the vaccine or are responsible for a co-pay, documentation of such expenses should be submitted to the {De-Identified} for reimbursement.
4. The vaccine requirements described herein may be temporarily delayed on an individual basis if CDC clinical precautions recommend delay for the Personnel. Team Member Health will maintain and securely store a record of Personnel whose vaccinations have been temporarily delayed.

5. Team Members' pay will not be deducted for time spent being vaccinated. If a Team Member must be vaccinated outside of the {De-Identified}, reasonable time off may be authorized for vaccination or vaccination side effects.

B. Vaccine Exemptions. Requests for exemptions to the vaccination requirement may be made to the Vaccine Exemption Committee by using the process described below. Such requests shall be securely stored.

1. *Types*. As of the date of this policy, the only exemptions to this vaccination policy that are required by state or federal law are:

- a. **Medical Exemptions**. Medical exemption requests will be reviewed and decisions will be made utilizing currently available evidence-based medical guidelines.

Medical exemptions may be granted to individuals with (1) an allergy to a vaccine or vaccine component; (2) a disability that creates a contraindication to vaccination; or (3) a condition or history of a condition such as Guillain-Barré syndrome that creates a contraindication to vaccination.

Individuals requesting a medical exemption must submit a complete *COVID-19 Vaccination Medical Exemption Form*. Note that a portion of this form must be completed and signed by a physician or other qualified healthcare provider actively treating the individual who is acting within his or her scope of practice and who has current details of the condition on which the exemption request is based. The physician or other qualified healthcare provider may not be the Personnel requesting the exemption. Requests for medical exemptions will be evaluated by applying standards established in applicable federal, state, and local laws relating to medical accommodations in the workplace.

- b. **Religious**. Exemptions may be granted based on an individual's religious beliefs. For purposes of this policy, "religious beliefs" include both theistic and non-theistic moral or ethical beliefs as to what is right and wrong, which are sincerely held with the strength of traditional religious views. Personal preferences do not constitute religious beliefs.

Individuals requesting an exemption due to religious beliefs must complete the *COVID-19 Vaccination Religious Exemption Form* attached to this policy. Requests for religious exemptions will be evaluated applying standards established in Title VII of the Civil Rights Act of 1964 and applicable state and local laws relating to religious accommodations in the workplace.

2. *Important Deadlines*.

- a. All individuals who are {De-Identified} Team Members or volunteers as of November 19, 2021, and wish to submit an exemption request that will be guaranteed to be evaluated by December 5 must do so by 5 p.m. on November 19, 2021.

- b. All new Team Members who start working at the {De-Identified} on or after

November 19, 2021, and wish to submit an exemption request must do so prior to their first day of employment.

- c. All Personnel who are not {De-Identified} Team Members or volunteers must follow their employer or school's policies and procedures on vaccination exemptions. Failure to do so will prevent the individual from providing care, treatment, or other services to the {De-Identified} or its patients. If an employer or school does not have a legally compliant policy or procedure on vaccination exemptions, the individual must submit their exemption request following the requirements for Team Members.
3. *Approval Process.* A multidisciplinary committee will review each properly completed exemption request. Responses to fully completed and timely requests for exemptions by the deadline provided above will be sent to the requesting individual via email within five business days. If an individual's exemption request is denied, the individual will have the opportunity to submit their request or an amended request to a multidisciplinary appeals committee. This appeal must be submitted within three calendar days of the receipt of the denial.

Note that requests submitted after the deadlines provided above may not allow enough time for the request to be reviewed by the deadline for vaccination or exemption. In such a case, the team member may be placed on unpaid administrative leave until they are vaccinated or an exemption is approved. PTO may not be used during this administrative leave.

Additional information may be requested if necessary to evaluate an exemption request adequately. In such cases, responses must be provided, in writing, within three calendar days of the request.

4. *Reapplication.* Once a religious exemption is granted, individuals do not need to reapply for the exemption unless facts and circumstances indicate the individual is engaging in actions inconsistent with their stated beliefs or if their beliefs have changed.

Due to variations among the components of vaccines, a medical exemption from one vaccine does not constitute an exemption from all vaccines. Once a medical exemption is approved for a vaccine, the exemption only applies to that preparation of the vaccine. Any changes in the preparation or manufacture of a vaccine will require an individual to submit a new medical exemption request.

5. *Accommodations.*

- a. Individuals who receive an exemption must take additional infection prevention measures, which could include:
 - i. Wearing personal protective equipment as established by the {De-Identified} (which shall include a minimum of a disposable procedural mask);
 - ii. Maintaining physical distancing from coworkers while at work; and

- iii. Completing weekly COVID-19 screening tests.
- b. Exempted Personnel may also be temporarily reassigned to a position that would remove them from contact with other team members, patients, vendors, and others if a position for which the individual qualifies is available. Pay will be evaluated at the time of the reassignment, and the individual may be required to sign a role description for the temporary position. The duration of the temporary assignment may be for the entire pandemic or outbreak period.
- c. The individual may be placed on leave without pay or allowed to take PTO during the pandemic or outbreak period, at the sole discretion of the {De-Identified}.
- d. If no accommodation is available, the individual may be terminated.

C. Policy Modifications. The COVID-19 pandemic remains and will continue to be a fluid, unprecedented, and unpredictable situation. Therefore, the {De-Identified} reserves the right to modify, amend, supersede, or discontinue this policy at any time, with or without prior notice to Personnel as circumstances may dictate. The {De-Identified} will promptly notify Personnel of substantive changes to this policy. Questions regarding this policy may be directed at any time to the Vaccine Exemption Committee at exemptions@xxx.org.

REFERENCES: 42 CFR 482, 430; Title VII of the Civil Rights Act of 1964; The Americans with Disabilities Act.

ATTACHMENT: *COVID-19 Vaccination Medical Exemption Form; COVID-19 Vaccination Religious Exemption Form*

This policy, procedure, or guideline may not represent the only medically or legally acceptable approach but rather is presented with the recognition that acceptable approaches exist. Deviations under appropriate circumstances do not represent a breach of a medical standard of care. New knowledge, new techniques, clinical or research data, clinical experience, or clinical or bio-ethical circumstances may provide sound reasons for alternative approaches, even though they are not described in this document.

If you have specific questions regarding the content of this policy, please contact the "Document Owner". If you have any general questions regarding policies, please contact the compliance office.