

PERSHING HEALTH SYSTEM

DEPARTMENT: ADMINISTRATION

DATE: 11/21

SUBJECT: Mandatory COVID-19 Vaccination **REVIEWED:** **REVISED:** 2/22, 3/22

PURPOSE: Per Center for Medicare/Medicaid Services (CMS) mandate dated January 14, 2022, Pershing Health System (PHS) has adopted this policy on mandatory vaccination to safeguard the health of our patients, staff, and volunteers.

SCOPE: Regardless of clinical responsibility or patient contact, this policy applies to the following staff, who provide any care, treatment, or other services for the hospital and/or its patients:

- a. Hospital employees
- b. Licensed practitioners
- c. Students, trainees, and volunteers; and
- d. Individuals who provide care, treatment, or other services for the hospital and/or its patients under contract or by other arrangement

This policy does not apply to the following hospital staff:

- a. Staff who exclusively provide telehealth or telemedicine services outside of the hospital setting **and** who do not have any direct contact with patients and other staff specified above.
- b. Staff who provide support services for the hospital that are performed exclusively outside of the hospital setting **and** who do not have any direct contact with patients and other staff specified above.

POLICY: All employees covered by this policy are required to be fully vaccinated as a term and condition of employment with Pershing Health System. Staff are considered fully vaccinated with the completion of a primary vaccination series, defined as the administration of a single-dose vaccine, or the administration of all required doses of a multi-dose vaccine.

All employees are required to report their vaccination status, including booster doses, and to provide proof of vaccination to the Human Resources department. All employee COVID vaccination information will be maintained in the HRIS system and immunization record. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results. Employees not in compliance with this policy will be subject to disciplinary action up to and including termination.

Employees may request an exemption from this mandatory vaccination if the vaccine is medically contraindicated for them or medical necessity requires a delay in vaccination. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated because of a disability, or if the

provisions in this policy for vaccination and/or testing for COVID-19 conflict with a sincerely held religious belief, practice, or observance. Requests for exemptions and reasonable accommodations must be completed in writing by the employee using the “Request for Accommodation: Medical Exemption from Vaccination” or the “Religious Accommodation Request” form. All such requests will be turned in to the Human Resources department where they will be handled in accordance with applicable laws and regulations as well as applicable policies and procedures.

On March 15, 2022 or your first scheduled work day after March 15, 2022 any unvaccinated personnel will be subject to an unpaid leave of absence not to exceed 3 days to comply with the vaccination or termination will occur.

Note: A temporary delayed vaccination will be taken into account, as recommended by the CDC, due to clinical precautions and considerations, including, but not limited to, individuals with acute illness secondary to COVID-19, or individuals who received monoclonal antibodies or convalescent plasma for COVID-19 treatment within the last 90 days.

PROCEDURE:

Overview and General Information

Per CMS, all PHS staff must be fully vaccinated no later than March 15, 2022.

To be fully vaccinated by March 15, 2022, an employee must:

- Obtain the first dose of a multi-dose vaccine no later than February 14, 2022; or single dose vaccine by February 14, 2022.

Employees may schedule their vaccination appointments at most local pharmacies.

Vaccination Status and Acceptable Forms of Proof of Vaccination

All vaccinated employees are required to provide proof of COVID-19 vaccination, regardless of where the vaccination is received. Proof of vaccination status can be submitted by providing a paper copy of the vaccination record in person to the Human Resources department, or emailing a picture of the vaccination record to Tiffanie.Bruner@phsmo.org or Angela.Schmitt@phsmo.org.

Acceptable proof of vaccination status is:

- The record of immunization from a healthcare provider or pharmacy;
- A copy of the COVID-19 Vaccination Record Card;
- A copy of medical records documenting the vaccinations;
- A copy of immunization records from a public health, state, or tribal immunization information system; or

- A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s).

All employees must inform Human Resources of their vaccination status by the end of business March 15, 2022.

Supporting COVID-19 Vaccination

An employee will be allowed two (2) hours of paid time per dose to travel to the vaccination site, receive a vaccination, and return to work. This would mean that a maximum of four hours of paid time will be granted for employees receiving multi-dose vaccinations. Employee must be scheduled in order to receive the paid time. Paid time will not be paid if the vaccination(s) are received on employee's scheduled time off. This time will be paid at the employee's base rate and will be paid at straight time.

If an employee spends less time getting the vaccine, only the necessary amount of scheduled work time will be granted. Employees who take longer than the two-hour paid time will require the use of PTO.

Employees will be required to follow the facility's PTO/EIL Policy for any time missed due to side effects from the COVID-19 vaccination that prevent them from fulfilling their work duties. Employees who do not have PTO/EIL to cover time off due to side effects from the COVID-19 vaccine, will be unpaid.

Employees will be required to take the following steps to request paid time to obtain the COVID-19 vaccination:

1. Schedule appointment for vaccination(s);
2. Notify supervisor of scheduled appointment date, time, and location;
3. If schedule to work during the time of appointment, supervisor will notify HR of date/time of appointment;
4. Payroll Specialist will enter paid time into time sheet for any time missed due to vaccination appointment.

Employees will be required to notify their supervisor if they are unable to fulfill scheduled shifts due to side effects following the COVID-19 vaccination. Current PTO/EIL Policy will be followed for any scheduled time missed by employees.

Additional Covid 19 Mitigation Strategies

PHS will implement additional strategies to prevent the transmission of COVID-19 related to unvaccinated employees, or those who have been granted an exemption as authorized by the law, or who have a temporary delay. All strategies will align with the Centers for Disease Control (CDC) guidance.

The following are actions taken to potentially reduce the risk of COVID-19 transmission:

1. Adhering to universal source control and physical distancing measures when in staff meeting rooms, dining areas, etc.
2. Adhering to universal source control by wearing an ASTM Level 3, regardless of whether they are providing direct patient care to or otherwise interacting with patients.
3. Continued employee screening (real time or self-screening) and monitoring for signs and symptoms of COVID-19 illness.

New Hires

All new employees are required to comply with the vaccination requirements outlined in this policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this policy prior to start of employment. Proof of vaccination will be required upon date of hire.

1. New employees will be given 10 business days to request a Medical or Religious exemption or obtain their first vaccine of a multi-dose vaccine (or receive single dose vaccine).
2. Employees opting to comply with vaccination policy by receiving an initial vaccine dose of a multi-dose vaccine will then be granted a period of six (6) weeks to receive their second vaccine dose. Employees receiving a single dose vaccine will be considered fully vaccinated.

Questions

Please direct any questions regarding this policy to the Human Resources department.