



INFECTION CONTROL/EMPLOYEE HEALTH SERVICES

Title: COVID-19 Vaccination Requirement

Number: IC-6017

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Review Date: (no revisions):

PURPOSE

The purpose of this policy is to provide direction to Harbor Regional Health Community Hospital (HRHCH) staff on the implementation of the COVID-19 vaccination requirement for its employees, medical staff, and volunteers.

POLICY

It is the policy of Harbor Regional Health Community Hospital to provide a safe and caring environment for all patients, visitors, and workers, including following public health orders issued during the COVID-19 pandemic and CMS Standards of Participation. The goal for HRHCH is 100% of employees, volunteers, medical staff, and on-site contractors to be fully vaccinated or have an approved medical or religious exemption.

Vaccination Requirement

All staff employed at HRHCH are to be fully vaccinated against COVID-19 except for those staff who have been granted a medical or religious exemption.

To meet the requirement to be fully vaccinated against COVID-19 an individual must be two weeks post receiving the second vaccine in a two-dose series for Pfizer-BioNTech or Moderna vaccine or two weeks post the single dose of Johnson & Johnson/Janssen vaccine.

Applicability

HRHCH is a Health Care Setting. HRHCH is prohibited from permitting an unvaccinated "Health Care Provider" from engaging in work for HRHCH. "Health Care Provider" means:

- Individuals with credentials listed in the Healthcare Professional Credentialing Requirement list
- Individuals who are permitted by law to provide health care services in a professional capacity without holding a credential.
- Individuals who meet the definition of Worker in any Health Care Setting. This includes HRHCH employees, licensed practitioners, students, trainees, service providers, volunteers, and [most] independent contractors.

Visitors or patrons are not subject to the requirement to provide proof of vaccination. Independent contractors or those who provide exclusive telehealth or telemedicine services and any of their workers are only exempt from this requirement if they are not providing goods or services on site.

Proof of Vaccination

For employees, medical staff, and volunteers. All employees, medical staff, and volunteers of HRHCH defined as Health Care Providers must provide proof of full COVID-19 vaccinationⁱ to Employee Health by providing one of the following:

- CDC COVID-19 Vaccination Record Card or photo of the card;

- Documentation of vaccination from a health care provider or electronic health record; or
- State immunization information system record.

Personal attestation is not an acceptable form of verification of COVID-19 vaccination.

For contractors. HRHCH will require all contract agencies to provide proof of vaccination requirements or exemption documentation to HRH for contractors and their workers who are working at HRHCH. Proof of vaccination requirements or exemption documentation shall be provided to the HRHCH Employee Health Department. Contractors for whom the agency has not provided such evidence will no longer be allowed to work on-site at HRHCH. Failure of the agency to provide such evidence may result in termination of the contract.

Failing to Provide Proof of Vaccination

Employees, volunteers, and medical staff who fail to provide proof of vaccination will not be allowed to continue or be employed at HRHCH unless such individuals are requesting and received an approved medical or religious exemption.

Exemptions from Vaccination Requirement HRHCH will allow for disability-related reasonable accommodations and reasonable accommodations for a sincerely held religious belief. HRHCH need not provide such accommodation if the accommodation would cause an undue hardship to HRHCH or pose a direct threat to the individual or others.

To request a reasonable accommodation an individual must contact Human Resources and provide the following:

- **Disability accommodation.** For a disability-related accommodation the individual must provide documentation from an appropriate health care or rehabilitation professional authorized to practice in the State of Washington, utilizing the attached Accommodation: Medical Exemption from Mandatory COVID-19 Vaccination form stating the individual has a disability that necessitates an accommodation from the mandatory COVID-19 vaccination and the probable duration of the need for accommodation. Pursuant under the Americans with Disabilities Act (ADA), Title VII of the Civil Rights Act of 1964 (Title VII), the Washington Law Against Discrimination (WLAD), or any other applicable law to a disability-related reasonable accommodation,
- **Religious accommodation.** For an accommodation to the mandatory COVID-19 vaccination for a sincerely held religious belief the individual must provide a statement, utilizing the attached Accommodation: Religious Exemption from Mandatory COVID-19 Vaccination form regarding the way in which the requirement to be vaccinated conflicts with the religious observance, practice, or belief of the individual.

For exemptions based on disability or religious accommodations, an interactive process to determine reasonable accommodation will apply. If additional clarification is needed, individuals will be contacted within seven (7) days of submission of their request and are expected to provide the requested clarification within five (5) days, absent exceptional circumstances. An individual whose exemption process is pending will be placed on administrative leave until the exemption process is complete. No further action will be taken until the reasonable accommodation process is complete.

Reasonable accommodation will be determined on an individualized basis depending on the facts and circumstances. Reasonable accommodation may include: remote work, additional PPE requirements and mandatory testing, or reassignment.

Accommodations may be time-limited and are subject to change.

Communication of Vaccination Requirement.

Communication of this requirement will be provided in the following ways:

- Email

- Social media posts
- Press release
- Posters

Management’s Responsibilities. Management of HRHCH will take the following steps:

- Ensure affected individuals are aware of this policy, the mandatory vaccine requirement, the exemption process, and any applicable educational materials regarding the vaccine, as appropriate.
- Maintain the confidentiality of any medical information or information concerning vaccine status of applicable individuals. Such information should be treated as need-to-know only.
- Refrain from asking individuals follow-up questions about their vaccine status that may tend to reveal a disability. If an individual indicates that they qualify for an exemption, they should be referred to the exemption process without being required to answer any further questions.
- Ensure individuals, vaccinated or not, are aware of any department-specific requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.
- Ensure individuals with an exemption follow any additional required restrictions, safety protocols, or safety requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self and others.
 - Ensure all policy and procedural steps are followed as outlined in this policy including communicating and administering the “failure to comply” consequences in a timely and consistent manner. Maintain all records of COVID-19 vaccinations and exemptions, ensuring timely input of compliance
 - In appropriate management information systems.
 - Review the requests for exemption in a timely manner and coordinate any clarifications as quickly as possible.
 - Review all submitted documents and complete the request for exemption process in accordance with HR policies.
 - Work with appropriate departments/resources to provide additional health education consultation regarding benefits of vaccination and appropriate provision of protective equipment for non-vaccinated individuals.
 - Review of requests for exemption in a timely manner and coordinate any clarifications as quickly as possible.
 - Monitor compliance and ensure suspension and termination for non-compliance are followed in accordance with policy.

Individual’s Responsibilities. Individuals subject to this policy must:

- Ensure vaccination compliance by the stated deadline.
- For those individuals with approved exemptions, comply with all job restrictions, safety protocols, and safety requirements as directed for compliance with reasonable accommodations. Wear appropriate PPE specified for non-vaccinated applicable individuals, which may include masks and/or face shields and other PPE for the period of time designated by management and/or infection control.
- Follow all COVID-19 related reporting and safety protocols, whether you are vaccinated or not.

Infection Control/Employee Health Responsibilities:

- All COVID vaccines, boosters, or exemptions are kept in employee files located in a secure file cabinet in Employee Health office.
- All employed staff are placed on a spreadsheet that provides date of vaccine and booster if applicable, type of vaccine, or if an exemption was provided.

- Upon hire or termination, all employee information is given to Employee Health to update the spreadsheet.
- Exemption forms are kept in the employee file which also specifies the requirements of the employee while at work and have been reviewed and approved by a Medical Provider.

Hiring Process

- Upon job offer, the recruiter asks for proof of COVID-19 vaccination status. If the individual is not vaccinated, they are given instructions on applying for a medical or religious exemption.
- Letters are provided to individuals requesting exemptions. See attachment A
- During New Employee Orientation (NEO) a copy of the COVID-19 vaccine card is obtained by the Infection Control/Employee Health Director and placed in their employee health file
- New employees are then added to the up to date COVID-19 vaccination status list maintained by the Infection Control/Employee Health Director

Exempted Employees

- Employees, volunteers, or medical staff who have received an approved medical or religious exemption will wear an mask fit tested N95 mask at all times unless eating alone, and eye protection in the form of goggles or face mask when providing direct patient care.

Additional Precautions:

- The facility cafeteria is closed and only available for to go orders
- Conference rooms are limited to certain numbers of individuals at a given time
- Break rooms have a limited seating capacity
- Screening of all employees, visitors, and contracted vendors is done at time arrival at the main entrance.
- Masks are available and provided to anyone entering the facility that does not have one
- Plexiglass partitions are in multiple areas, including but not limited to, registration, nurses stations, Human Resources, and the cafeteria.
- Fit testing is done during new employee orientation for all staff

¹ **“Fully Vaccinated against COVID-19”:** A person is fully vaccinated against COVID-19 two weeks after they have received the second dose in a two-dose series of a COVID-19 vaccine authorized for emergency use, licensed, or otherwise approved by the FDA (e.g., Pfizer-BioNTech or Moderna) or two weeks after they have received a single-dose COVID-19 vaccine authorized for emergency use, licensed, or otherwise approved by the FDA (e.g., Johnson & Johnson (J&J)/Janssen.)

Approved at June 24, 2022 Medical Executive Committee Meeting

 Chief of Staff

 Date

Authored By:

 Director Infection Control/Employee Health

 Date

Authenticated By:

 Chief Nursing Officer

 Date
