



## **Ten Processes Required to Be Addressed in CMS Vaccine Rule Policies**

On November 5, 2021, CMS published [Omnibus COVID-19 Health Care Staff Vaccination](#), an interim final rule requiring all staff in CMS-certified settings to be fully vaccinated against COVID-19. In this rule, CMS outlined a number of processes that providers must outline in policies and procedures. LeadingAge has created the list below to help providers ensure that all required processes have been outlined in the organization's policies.

CMS requires the development of policies to address the following processes:

- Ensuring that staff are fully vaccinated against COVID-19
- Ensuring that staff have received at least one dose of COVID-19 vaccine prior to providing care
- Requesting exemptions from COVID-19 vaccination because of certain medical conditions or sincerely held religious beliefs, practices, or observances
- Tracking and securely documenting exemption requests and outcomes
- Tracking and securely documenting the vaccination status of all staff
- Tracking and securely documenting staff booster shots
- Tracking and securely documenting the status of any temporary delays to vaccination and the plan to complete vaccination
- Ensuring medical exemption requests meet documentation requirements
- Additional precautions for those who are not fully vaccinated
- Contingency plans for staff who are not fully vaccinated, including updating applicable emergency plans

Please note that multiple processes may be covered in a single policy. Additionally, remember to cross-check existing policies to ensure consistency with new requirements. For example, be sure that contingency plans for staff who are not fully vaccinated are consistent with and incorporated into existing emergency plans that address staff, such as plans to address staffing shortages or plans for utilizing additional volunteers for emergency evacuations.

Other examples of updates to existing policies include updating policies around educating staff on COVID-19 vaccination to include the requirement for vaccination while potentially cross-referencing to the policy on requesting exemptions to COVID-19 vaccination.

Remember that staff includes all employees, licensed practitioners, students, trainees, volunteers, and individuals providing care, treatment, or services to or on behalf of the CMS-certified setting under contract or arrangement.

**To assist in policy development, be sure to check out these additional resources:**

[CMS Omnibus COVID-19 Health Care Staff Vaccination](#)

[COVID-19 Vaccine Policy Template](#) (must have LeadingAge login to access)

[Safer Federal Workforce Medical Exemption Request Template](#)

[Safer Federal Workforce Religious Exemption Request Template](#)

[LeadingAge Compendium of Vaccine Mandate Resources](#)

[CDC Summary Document on COVID-19 Vaccination](#) (includes medical contraindications)