

COVID-19 Vaccine Policy

Employees (Updated 11/10/21)

Policy

It is the policy of this facility that all eligible staff must receive the first dose of a two-dose COVID-19 vaccine or a one-dose COVID-19 vaccine prior to providing any care, treatment, or other services, unless an exemption is granted based on recognized medical conditions or sincere religious beliefs consistent with federal law by December 5, 2021, and be fully vaccinated by January 4, 2022.

Definitions:

Fully Vaccinated:

- Two weeks after the second dose in a two-dose series of a vaccine of a COVID-19 vaccine that is licensed or authorized for emergency use by the U.S. Food and Drug Administration (FDA) (Pfizer-BioNTech [Comirnaty] or Moderna Vaccines) or
- Two weeks after a single-dose vaccine (Janssen [Johnson & Johnson] Vaccine)

Note: Staff will be allowed to work if able to show evidence that they received a vaccine listed by the World Health Organization (WHO) for emergency use that is not approved or authorized by the FDA, or who received a vaccine during their participation in a clinical trial. For initial Phase 2 compliance, staff will be considered compliant if primary vaccine series is completed by January 4, regardless of whether they have completed the 2 week wait period to be considered “fully vaccinated”

Eligible Staff:

- Current facility staff
- New Staff
- Licensed Practitioners
- Students
- Trainees
- Volunteers
- Any individuals who provide care, treatment, or other services for the facility and/or facility residents under contract or other arrangement

Procedure:

1. The Infection Preventionist or designee will complete a roster of all eligible staff and current vaccination status
 - a. Dates and type of each of the primary two doses of a two-dose COVID-19 series (Pfizer-BioNTech [Comirnaty] or Moderna Vaccines)

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- b. Date and type of the one dose of a one-dose COVID-19 Vaccine (Janssen [Johnson & Johnson] Vaccine)
 - c. Date and type of booster vaccine
 - d. Date and type of additional dose for immunocompromised employees
2. The Infection Preventionist or designee, will identify employees who do not meet the definition of fully vaccinated
3. The Infection Preventionist or designee, will contact each employee who does not meet the definition of fully vaccinated to determine:
 - a. If eligible staff has received one-dose of the two-dose series and has an appointment for the second dose
 - b. If eligible staff has an appointment to receive the single-dose COVID-19 vaccine
 - c. If eligible staff requests a medical or religious exemption. Employee will be informed of the facility's process to request and to be granted an exemption. Documentation for exemptions for becoming vaccinated for COVID-19 include:
 - i. Medical condition, contraindications including staff who have a temporary delay (i.e., active COVID-19 infection, and individuals who received monoclonal antibodies or convalescent plasma for COVID-19 treatment, etc.) of COVID-19 vaccination(s) in accordance with the CDC
 1. Documentation must be signed and dated by a licensed practitioner (other than the individual requesting the exemption) that includes:
 - a. All information specifying which of the authorized COVID-19 vaccines are clinically contraindicated for the staff member to receive and the recognized clinical reasons for the contraindications; and
 - b. A statement by the authenticating practitioner recommending that the staff member be exempted from the facility's COVID-19 vaccination requirements for staff based on the recognized clinical contraindications
 - ii. Sincere religious beliefs documented and evaluated in accordance with applicable federal law and as a part of the facility's policies and procedures
 - iii. Other
 - d. If eligible staff (other than employees with valid exemptions) refuses to be vaccinated or request exemption with a COVID-19 first dose of a two-dose series or a dose of the one-dose COVID-19 vaccine by December 5, 2021, or final dose of a two-dose series by January 4, 2022, employee will be terminated (or placed on unpaid leave for up to 60 days if able to show evidence employee is fully vaccinated).

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- i. If employer is able to accommodate 100% of telework offsite, dependent upon the role and availability of work, employee may be able to work remotely.
4. The Infection Preventionist or designee, will educate all employees who are not fully vaccinated (i.e., employee received one dose of a two-dose series or less than 2 weeks since the last dose of a primary COVID-19 vaccine and employees with a valid exemption) additional precautions and measures to mitigate the spread of COVID-19 for all staff that are not fully vaccinated:
 - a. Personal Protective Equipment
 - b. Transmission-Based Precautions
 - c. Hand Hygiene
 - d. Physical Distancing
 - e. Cleaning and Disinfection
 - f. Screening
 - g. Testing per facility COVID-19 testing policy and procedure
5. All staff will be educated on the COVID-19 vaccine they are offered, in a manner they can understand, and receive the FDA COVID-19 EUA Fact Sheet before being offered the vaccine. Education must cover:
 - a. Benefits and potential side effects of the COVID-19 vaccine
 - b. If the vaccination requires multiple doses of vaccine, the staff will be provided with education regarding the benefits and potential side effects and current information regarding those additional doses, including any changes in the benefits or potential side effects, before requesting consent for administration of any additional doses.
 - c. The facility will maintain records of all COVID-19 vaccine education.
6. All new employees will be required to show evidence of COVID-19 vaccination(s) to determine if fully vaccinated or if the second dose of a two-dose series will need to be administered prior to providing care to any residents.

References and Resources

- Centers for Disease Control and Prevention. When You've Been Fully Vaccinated. Updated Oct. 15, 2021: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html>
- Centers for Medicare & Medicaid Services. CMS Omnibus COVID-19 Health Care Staff Vaccination Interim Final Rule External FAQ: <https://www.cms.gov/files/document/cms-omnibus-staff-vax-requirements-2021.pdf>

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- Centers for Medicare & Medicaid Services. Federal Register, Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination. 11/05/2021: <https://www.federalregister.gov/documents/2021/11/05/2021-23831/medicare-and-medicare-programs-omnibus-covid-19-health-care-staff-vaccination>
- Centers for Medicare & Medicaid Services. QSO-21-19-NH, “Interim Final Rule - COVID-19 Vaccine Immunization Requirements for Residents and Staff”, May 11, 2021: <https://www.cms.gov/files/document/gso-21-19-nh.pdf>
- Centers for Disease Control and Prevention. Interim Clinical Considerations for Use of COVID-19 Vaccines Currently authorized in the United States. Last Reviewed: Nov. 5, 2021: <https://www.cdc.gov/vaccines/covid-19/info-by-product/pfizer/clinical-considerations.html>
- Centers for Disease Control and Prevention. Interim Considerations: Preparing for the Potential Management of Anaphylaxis after COVID-19 Vaccination. Page last reviewed: November 3, 2021: <https://www.cdc.gov/vaccines/covid-19/clinical-considerations/managing-anaphylaxis.html>
- Vaccine Adverse Event Reporting System (VAERS) Frequently Asked Questions (FAQs): <https://vaers.hhs.gov/faq.html>
- Centers for Disease Control and Prevention. COVID-19 ACIP Vaccine Recommendations. Advisory Committee on Immunization Practices (ACIP), Page last reviewed, November 5, 2021: <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/covid-19.html>
- Centers for Disease Control and Prevention. New COVID-19 Vaccination Provider Trainings. 03/24/2021: <https://www.cdc.gov/vaccines/covid-19/downloads/covid19-vaccination-provider-trainings.pdf>