

COVID-19 Vaccination Policy

Policy: It is the policy of The Regional Medical Center of Orangeburg and Calhoun Counties and its affiliated facilities (collectively “RMC”) including ERH to comply with the Centers for Medicare & Medicaid Services (“CMS”) Interim Final Rule (“Rule”) by ensuring that all staff are vaccinated for COVID-19. This Rule went into effect November 5, 2021, upon publication in the Federal Register and requires Phase 1 to be implemented by December 6, 2021, and Phase 2 by January 4, 2022. The Rule and this policy is in response to the public health emergency created by COVID-19 (“PHE”) and is expected to remain relevant for some time beyond the declaration of the PHE.

Purpose: To ensure all affected staff are vaccinated for COVID-19 and to require that appropriate documentation of those vaccinations is tracked and maintained.

Scope: This policy applies to any individual who performs duties at any RMC facility including ERH, or has the potential to have contact with anyone at any facility, including staff, contractors, or patients, regardless of whether they have clinical responsibility or patient contact. This includes all current staff and new staff. Individuals encompassed by this policy include, but are not limited to, facility employees, administrative staff, clinical staff, licensed practitioners, students, trainees, and volunteers. This policy also applies to any individual under contract or other arrangement with the facility. These individuals are collectively defined as healthcare workers (“HCWs”) for purposes of this policy.

Exclusions: Individuals who solely provide services remotely; individuals who do not provide services by contract or under arrangement and infrequently enter any site of care for specific limited purposes and for limited amount of time (e.g. delivery or repair personnel).

Definitions:

Fully Vaccinated: Individuals are considered to be Fully Vaccinated 14 days after receipt of either a single-dose vaccine or the second dose of a two-dose primary vaccination series.

Procedure:

A. Provisions of Phase 1 and Phase 2 must be completed before the deadlines stated below:

1. Phase 1: Effective December 6, 2021, all eligible HCWs, at a minimum will have received a single dose COVID-19 vaccine or the first dose of a primary series (2-dose series) COVID-19 vaccine¹, or requested and been granted a lawful exemption

¹ An acceptable COVID-19 vaccine includes: (a) any vaccine licensed or authorized for emergency use by the Food and Drug Administration (“FDA”); (b) any vaccine listed by the World Health Organization for emergency use that is not approved or authorized by the FDA; or (c) vaccines given during participation in a clinical trial performed in the United States and who received an “active” vaccine (versus placebo).

2. Phase 2: Effective January 4, 2022 all eligible HCWs, will have received the final dose of a primary vaccination series (2-dose series), except for those HCWs who have been granted exemptions from COVID-19 vaccination or those for whom vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and considerations.

HCWs who have completed the primary series for vaccine received by the Phase 2 implementation date are considered to have met the requirements of the Rule, even if they have not completed the 14-day waiting period to be considered Fully Vaccinated.

3. Additional precautions are required to mitigate the transmission and spread of COVID-19 for all HCWs that are not Fully Vaccinated, as defined by RMC policy.
4. HCWs on a leave of absence during the implementation phases shall complete Phase I and II actions prior to return to work.
5. Newly hired HCWs shall comply with this policy during the new hire process and shall complete Phase I and II actions prior to beginning work.
6. HCW vaccination data is collected and reported to the National Healthcare Safety Network (NHSN/CDC) according to reporting requirements.
7. COVID-19 vaccination must be completed before Phase 1 and Phase 2 implementation deadlines or the HCW will be subject to disciplinary action up to and including termination.
8. HCWs are required to provide the Employee Health department with proof of vaccination before Phase 1 and Phase 2 implementation deadlines or the HCW will be subject to disciplinary action up to and including termination.

B. Exemptions:

1. HCWs may request an exemption from COVID-19 vaccination requirements based on applicable law.
2. Requests for accommodations for medical or religious exemption (attached) must be submitted to the HCW's human resources department by any RMC-imposed deadline.
3. Medical Exemption Procedure:
 - a. Any HCW requesting a medical exemption due to a serious health condition is required to complete the REQUEST FOR MEDICAL EXEMPTION TO THE COVID-19 VACCINE (attached).
 - b. The documentation must include a statement by the authenticating practitioner recommending that the HCW be exempted from the facility's COVID-19

vaccination requirements, specifying which of the authorized COVID-19 vaccines are clinically contraindicated, and the recognized clinical reasons for the contraindication. Guidance for medical exemptions for COVID-19 vaccination can be viewed at <https://www.cdc.gov/vaccines/covid-19/clinical-considerations/index.html>.

4. Religious Exemption Procedure:

- a. A HCW requesting a religious exemption due to a sincerely held religious belief, practice, or observance is required to complete the REQUEST FOR RELIGIOUS EXEMPTION TO THE COVID-19 VACCINE (attached).
- b. Exemption requests based on social, political, or personal views will not be granted.

5. Miscellaneous:

- a. In the event there is a shortage of COVID-19 vaccine supply or items necessary to administer vaccine, the requirements for vaccination will be amended to reflect CDC and/or CMS guidance for prioritization of vaccine.
- b. HCWS who are not Fully Vaccinated are to adhere to additional precautions to mitigate the transmission and spread of COVID-19, as required by RMC policy.

References:

Federal Register/ Vol. 86, No. 212/ Rules and Regulations. Department of Health and Human Services. Posted November 5, 2021.