

IDENT	COVID HR6
Type of Document	Policy
Applicability Type	Covid-19
Title of Owner	Mgr Employee Relations
Title of Approving Official	VP Human Resources
Date Effective	5/17/2022
Date of Next Review	5/17/2023



**TITLE:** Non-Employed Staff COVID Vaccine

**PURPOSE:** As an academic health system, we rely on data, research and science to keep our patients healthy and save lives. The recent rise of COVID-19 cases in our region and across the country due to the highly contagious omicron variant has once again made one thing clear: Vaccination is how we control the spread and hopefully end this pandemic. As a health care provider, our consistent message through the pandemic has been to get vaccinated to protect yourself and others, and it is imperative that we do the right thing to protect our patients, our communities and our employees. We need to provide the safest and best care possible, in the safest environment possible.

**POLICY STATEMENT:** UVM Health Network, in accordance with CMS requirements, requires our entire workforce – including non-employed staff (e.g., contractors, students, volunteers, trainees, consultants, medical staff) to be fully vaccinated against COVID-19 as a condition to providing on-site services on UVM Health Network premises.

**PROCEDURE:**

Non-employed staff must be fully vaccinated or be granted a valid exemption as follows. UVM Medical Center is only permitted to grant exemptions that are available to non-employed staff under federal law.

**I. Submit Proof of Vaccination:**

By **January 27, 2022**, each staff member identified in the policy statement section who is not a 100% remote worker is required to submit proof that they have received, at minimum, a single-dose COVID-19 vaccine or the first dose of a multi-dose COVID-19 vaccine. After **February 15th**, staff will not be eligible to work on-site until they meet this requirement and their contract or engagement may be terminated unless they have an approved exemption and their unvaccinated status can be accommodated in their position.

By **February 28, 2022**, staff who receive a multi-dose vaccine must provide proof they have received all required doses. After **that date**, staff will not be eligible to work on-site until they meet this requirement and their contract or engagement may be terminated unless they have an approved exemption and their unvaccinated status can be accommodated in their position.

Staff are not required to receive COVID-19 vaccine booster doses, at this time. However, staff who do elect to receive a COVID-19 vaccine booster dose are required to submit proof to UVM Medical Center.

As part of our policy, you are fully vaccinated two weeks after receiving both doses of the Moderna, Pfizer or AstraZeneca vaccine or one dose of the J&J/Janssen vaccine. Weekly testing will continue until this requirement is met.

For those who have received their vaccine series outside of the United States, Employee Health will consider workers fully vaccinated if they have received a vaccine from the World Health Organization (WHO) approved vaccine list.

Please submit proof of vaccination (including boosters) using the [Non-Employed Staff Vaccination Attestation](#) or in the format requested by the department to which you are providing services.

**II. Fully Remote Staff:** Non Employed Staff who work 100% remotely and do not have direct contact with patients or other staff are not subject to the COVID-19 vaccination requirement.

**III. Exemptions and Reasonable Accommodation:**

- **Exemptions.** Limited exemptions from COVID-19 vaccination are available to certain non-employed staff who cannot be vaccinated due to a medical condition for which vaccination is contraindicated or because vaccination is inconsistent with their sincerely held religious beliefs. Eligible non-employed staff must submit requests or inform UVM Medical Center of their employer-documented approvals for exemption by **January 27, 2022**. New staff must complete the exemption process prior to providing services.

### Exemption Eligibility

- **Agency-UVM Medical Center Contracted Workers** (e.g., nurse travelers and temporary agency staff) may be eligible for reasonable accommodation of their unvaccinated status for medical or religious reasons only if their request for exemption (i) has been evaluated and approved by their employing agency; and (ii) all supporting documentation required by CMS will be made immediately available to UVM Medical Center. Alternatively, UVM Medical Center may request an Agency Contracted worker to provide a copy of any approved exemptions for UVM Medical Center's files using the [Non-Employed Staff Vaccination Attestation](#). Agency Contracted Workers will be paid for their time testing.
- **Students** may be eligible for reasonable accommodation of their unvaccinated status for medical reasons only if their request for exemption (i) has been evaluated and approved by their school or university; and (ii) all supporting documentation required by CMS will be made immediately available to UVM Medical Center. Alternatively, UVM Medical Center may request a student to provide a copy of any approved medical exemption for UVM Medical Center's files using the [Non-Employed Staff Vaccination Attestation](#).
- **Licensed Independent Practitioners** (e.g., non-employed physicians, nurse practitioners, and physician assistants) may be eligible for reasonable accommodation of their unvaccinated status for medical reasons only. Requests for medical exemption must be made through the [Non-Employed Staff Vaccination Attestation](#). The Network Chief Medical Officer will review submitted medical exemptions for UVM Medical Center staff. If it is determined that you cannot be vaccinated against COVID-19 due to a medical condition, or vaccination must be temporarily postponed, we will consider whether and how we can reasonably accommodate your unvaccinated status. Accommodation will often be approved, but we may decline to provide accommodation if this would cause an undue hardship to UVM Medical Center's operations, our employees, or our patients, as defined by applicable law.
- **Independent Contracted Workers** (e.g., suppliers, consultants) are ineligible for an exemption and must be fully vaccinated to provide services on-site.
- **Volunteers** are ineligible for an exemption and must be fully vaccinated to provide services on-site.

#### For approved or requested medical exemptions (Agency- Contracted Workers, LIPs, and Students only):

- A medical exemption must be in writing and supported by your healthcare provider's opinion that you cannot be vaccinated against COVID-19 due to a recognized clinical contraindication. Your healthcare provider's opinion must specify which COVID-19 vaccines are clinically contraindicated and the recognized clinical reasons for the contraindication(s).
- A request to temporarily delay vaccination must be supported by your healthcare provider's opinion that vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and considerations.
- If it is determined that you cannot be vaccinated against COVID-19 due to a medical condition, or vaccination must be temporarily postponed, we will consider whether and how we can reasonably accommodate your unvaccinated status. Accommodation will often be approved, but we may decline to provide accommodation if this would cause an undue hardship to UVM Medical Center's operations, our staff, or our patients, as defined by applicable law.
- Mitigation of COVID-19 transmission by individuals who are not fully vaccinated due to an authorized exemption or clinical contraindications will be accommodated with the option of weekly COVID-19 testing or following the Augmented personal protective ("Augmented PPE") approach as described below.
- Augmented PPE is an alternative to weekly testing that will require staff to remain masked at all times while in the facility, both in patient and non-patient facing areas. Staff choosing this option will be required to wear suitable eye protection during all direct patient care. In addition, these staff will be required to sufficiently socially distance from others when lowering their mask to eat or drink.
- Time spent testing will not be paid and every effort should be made to schedule testing outside of work hours. Staff will be responsible for any charges incurred with asymptomatic weekly testing.

**For approved religious exemptions (Agency- Contracted Workers only):**

- If you believe you cannot be vaccinated against COVID-19 because COVID-19 vaccination is inconsistent with your sincere religious beliefs, you may be eligible for exemption only if your employer has evaluated and reviewed your request and will provide CMS-required documentation of the approval upon immediate request by UVM Medical Center. Alternatively, UVM Medical Center may request an Agency-Contracted worker to directly provide a copy of any approved exemptions for UVM Medical Center's files using the [Non-Employed Staff Vaccination Attestation](#).
- Accommodation will often be approved, but we may decline to provide accommodation if this would cause an undue hardship to UVM Medical Center's operations, our employees, or our patients, as defined by applicable law.
- Mitigation of COVID-19 transmission by individuals who are not fully vaccinated due to an authorized exemption or clinical contraindications will be accommodated with the option of weekly COVID-19 testing or following the Augmented personal protective ("Augmented PPE") approach as described below.
- Augmented PPE is an alternative to weekly testing that will require staff to remain masked at all times while in the facility, both in patient and non-patient facing areas. Staff choosing this option will be required to wear suitable eye protection during all direct patient care. In addition, these staff will be required to sufficiently socially distance from others when lowering their mask to eat or drink.
- Time spent testing will not be paid and every effort should be made to schedule testing outside of work hours. Agency-contracted workers will be responsible for any charges incurred with asymptomatic weekly testing.

**Temporary exemption for new hires:**

- In conformance with guidance from The Joint Commission, new staff not fully vaccinated are permitted to start work following one dose of the multi-dose vaccine with the understanding that the staff member will receive the second dose when clinically eligible.
- New staff who are granted this temporary exemption must follow the Augmented PPE approach and remain masked at all times while in the facility, both in patient and non-patient facing areas. They must sufficiently socially distance from others when lowering their mask to eat or drink. They will still be required to wear suitable eye protection during all direct patient care.
- Upon completion of the multi-dose vaccine, they must provide documentation as described below.

**MONITORING AND DOCUMENTATION:**

- **Agency- Contracted Workers:** During onboarding, UVM Medical Center's Employee Health/Human Resources will collect agency attestations or documentation of COVID-19 vaccination status, including receipt of booster doses, using the [Non-Employed Staff Vaccination Attestation](#). Employee Health/Human Resources will maintain a list of Agency-UVM Medical Center Contracted Workers requiring weekly COVID-19 testing as a reasonable accommodation. Employee Health/Human Resources will notify applicable department leaders of approved reasonable accommodations, including weekly testing or Augmented PPE, as necessary. Test results must be maintained by the agency and available upon request.
- **Students:** UVM Medical Center's leaders in departments with on-site students will collect compliance attestations from sending schools or request students individually provide COVID-19 vaccination status, including receipt of booster doses, using the [Non-Employed Staff Vaccination Attestation](#). Employee Health/Human Resources will maintain a list of students requiring weekly COVID-19 testing or Augmented PPE as a reasonable accommodation. Employee Health/Human Resources will notify applicable department leaders of approved reasonable accommodations, including weekly testing or Augmented PPE, as necessary. Test results must be maintained by the schools and available upon request.
- **Licensed Independent Practitioners:** UVM Medical Center's Medical Staff Office will identify these staff and collect documentation and maintain records of their COVID-19 vaccination status, including receipt of booster doses, using the [Non-Employed Staff Vaccination Attestation](#) or Agility. UVM Medical Center's Medical Staff Office will maintain a list of staff requiring weekly COVID-19 testing or Augmented PPE as a reasonable accommodation. Medical Staff Office will notify staff's leaders of approved reasonable accommodations, including weekly testing, as necessary. Medical Staff Office will periodically review collected documentation

for non-compliance and will follow up with any LIP who is not in compliance with this policy. Test results will be maintained by the Medical Staff Office/Employee Health.

- **Independent Contracted Workers:** Network Supply Chain will identify these staff through Premier Connect and/or during the onboarding process and will collect documentation and maintain records of COVID-19 vaccination status, including receipt of booster doses, using either the deployed Vendor Credentialing solution (e.g., VendorMate, RepTrax, symplr), or the [Non-Employed Staff Vaccination Attestation](#). Network Supply Chain will periodically review collected documentation for non-compliance and will follow up with any Independent Contracted Worker who is not in compliance with this policy.
- **Volunteers:** UVM Medical Center’s Employee Health will collect documentation and maintain records of COVID-19 vaccination status, including receipt of booster doses, using through their onboarding process with Employee Health.

- IV. “One off” vendors, volunteers, and professionals:** UVM Medical Center will not maintain the vaccination status of “one off” vendors, volunteers, and professionals who provide only infrequent on-site services, or services that are performed exclusively off-site (such as accounting services), not at or adjacent to any site of patient care. When determining whether a vendor, volunteer, or professional falls within the “one off” category, UVM Medical Center will consider the frequency of presence, services provided, and proximity to patients and staff. UVM Medical Center will take reasonable steps to mitigate risk to the extent a “one off” vendor, volunteer, or professional is unvaccinated, such as requiring masking at all times when in the facility.

#### **CORRECTIVE ACTION**

Violation of this policy is grounds for action up to and including termination of the staff member’s (or company with which the staff member is associated contract or other arrangement with UVM Medical Center.

**DEFINITIONS:** N/A

**RELATED POLICIES:** COVID-19 Vaccine Policy – UVM Medical Center

**REFERENCES:** N/A

#### **REVIEWERS:**

Rachael Raynes,	Sr. Project Manager, Supply Chain, UVMHN
Amanda Angell,	Assistant General Counsel, UVMHN
Kim Morse,	Supervisor HR Operations

**OWNER:** Lindsey Melo, Mgr Employee Relations

**APPROVING OFFICIAL:** Mary Broadworth, VP Human Resources