



Owner: Administration – Hospital Wide

CURRENT AS OF: November 12, 2021

Purpose

During the COVID-19 pandemic, OCH Regional Medical Center (OCH) has been committed to maintaining a safe and healthy environment for our employees, staff, patients, and visitors in order to prevent individuals from contracting and spreading COVID-19. As part of this continued commitment, we are implementing a mandatory vaccination policy, as required by CMS, subject to the accommodation and exemption provisions stated in this policy. This policy is based on guidance from the Centers for Disease Control and Prevention (CDC), the Equal Employment Opportunity Commission (EEOC), and the Department of Health and Human Services (HHS) and is designed to comply with all applicable federal, state, and local laws. Compliance with this policy is a condition of continued employment or qualifications to provide services for OCH.

Applicability and Coordination with Other Policies

This policy applies to all covered staff who provide any care, treatment, or other services for OCH and/or its patients, including the following:

- Employees of OCH
- Licensed practitioners
- Students, trainees, and volunteers
- Vendors/Suppliers
- Individuals who provide care, treatment, or other services for OCH and/or its patients, under contract or by other arrangement.

These individuals are collectively referred to as “covered staff” in this policy.

Individuals are not subject to this mandatory vaccination policy if they (A) exclusively provide telehealth or telemedicine services outside of the hospital/facility setting *and* do not have any direct contact with patients or other staff identified above; or (B) provide support services for OCH that are performed exclusively outside of the hospital/facility *and* do not have any direct contact with patients or other staff identified above.

This policy is not intended to impact or change OCH’s other safety requirements and policies relating to COVID-19. Covered staff must continue to comply with all OCH COVID-19 safety requirements and policies applicable to them.

This policy is not intended to impact or change OCH’s current practices with respect to the use of required personal protective equipment (PPE) in the clinical environment.

Vaccination and Reporting Requirements

Covered staff are required to be fully vaccinated against COVID-19, unless an exemption from this policy has been granted for a medical or religious reason. For more on the accommodation and exemption process, see Accommodation and Exemption Requests below.

For purposes of this policy, you are considered “fully vaccinated” if it has been 2 or more weeks since you completed a primary vaccination series for COVID-19 (i.e., two doses of mRNA vaccination (Pfizer or Moderna products) or one dose of Johnson and Johnson vaccine).



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To comply with this policy, Employee Health must be provided an acceptable form of proof of vaccination. Acceptable forms of proof include, but are not limited to, the following:

- CDC COVID-19 vaccination record card or a legible photo of the card
- Documentation of vaccination from a health care provider or electronic health record
- State immunization information system record

This policy does not currently require covered employees to receive COVID-19 booster doses. However, if you have received a booster dose, you must report and provide proof of the booster dose as well as proof of your primary vaccination series.

OCH will keep your vaccine documentation confidential, consistent with applicable provisions of federal law. Do not include any genetic information with your proof of vaccination.

OCH will make available the Moderna, Pfizer, and Johnson and Johnson vaccine to staff, employees, and contracted workers, at no cost to the individuals receiving the vaccine, on Monday through Friday, from 8:00 a.m. until 4:00 p.m., in the Employee Health Office or other designated locations.

Covered staff who fail to comply with this policy will not be qualified or permitted to provide any care, treatment, or other services for OCH and/or its patients, subject to the accommodation and exemption provisions of this policy.

Accommodation and Exemption Requests

Covered staff of OCH other than vendors/suppliers must use the following procedures for requesting accommodations or exemptions to this policy.

Religious Accommodation

OCH provides reasonable accommodations, absent undue hardship, to employees with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated. If you believe you need an accommodation regarding this policy because of your sincerely held religious belief, you are responsible for requesting a reasonable accommodation from Human Resources.

Exemption for Other Medical Reasons

Exemptions for medical reasons may be available for conditions such as a history of certain allergic reactions or another medical condition that is a contraindication to the COVID-19 vaccine, even if the medical condition does not qualify as a disability under federal law. Temporary exemptions may be available for individuals who need to temporarily delay vaccination for medical reasons.



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How to Request a Religious Accommodation or Medical Exemption

You may request a religious accommodation or medical exemption from this policy by completing OCH’s COVID-19 Vaccination Accommodation/Exemption Request Form and returning it to Human Resources. The form is available on the OCH website (www.och.org) and MCN under Human Resources. The request form and all required supporting documentation should be returned to the lock box outside of the Human Resources office by November 22, 2021.

OCH reserves the right to request additional documentation supporting the need for an accommodation or medical exemption. OCH will keep confidential any medical information obtained in connection with your request for accommodation or exemption. You should not provide any genetic information to OCH when completing a request form or providing supporting documentation.

Determinations

OCH makes determinations about requested accommodations and exemptions on a case-by-case basis considering various factors and based on an individualized assessment in each situation. OCH strives to make these determinations expeditiously and in a fair and nondiscriminatory manner and will inform you after a determination has been made. If you have any questions about an accommodation or exemption request you made, please contact Human Resources. Determinations regarding accommodation or exemptions requests are not appealable under OCH’s Mandatory COVID-19 Vaccine Policy.

Compliance Timeline

The following initial compliance deadlines shall apply:

- November 22, 2021: Requests for accommodations or medical exemptions (along with required supporting documentation) must be received by Human Resources.
- December 6, 2021:
 - Covered staff must
 - have received, at a minimum, the first dose of the primary series or a single dose COVID-19 vaccine *or*
 - have been granted (or have a pending request for) an exemption to the vaccination requirement or have been approved to temporarily delay vaccination.
 - In addition, Employee Health must have documentation of covered staff’s vaccination status, including documentation of any vaccine booster doses.
- January 4, 2022:
 - Covered staff must be fully vaccinated or have received the final dose of a primary vaccination series, unless they have been granted an exemption to the vaccination requirement or they have been approved to temporarily delay vaccination.
 - In addition, Employee Health must have documentation that covered staff have completed a primary vaccination series.



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Covered staff who receive booster doses of the COVID-19 vaccine after January 4, 2022 must update Employee Health about their status and provide documentation of the booster doses.

Covered staff hired, engaged, or otherwise scheduled to provide any care, treatment, or other services for OCH or its patients after December 6, 2021, must have received, a minimum, the first dose of a two-dose COVID-19 vaccine or a one-dose COVID-19 vaccine prior to providing such care, treatment, or services and must thereafter timely complete a primary vaccine series.

Policy Administration and Questions

Human Resources is responsible for administering and enforcing this policy. If you have any questions about this policy or about health and safety issues that are not addressed in this policy, please forward written questions to Human Resources.

Policy Modification

Public health guidelines and business and industry best practices regarding COVID-19 and the vaccines are changing rapidly as new information becomes available and further research is conducted. OCH reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace and complying with applicable federal and state laws.

Non-Compliance

Failure to comply with any provisions of this policy will be subject to corrective action or discipline, up to and including termination of employment.

Employees

Who do not receive and provide documentation of their vaccination or have not been granted (or have a pending request for) an exemption to the vaccination by December 6, 2021, will be suspended without pay for up to seven (7) scheduled work days until the appropriate documentation is received by OCH. Failure to provide documentation within the suspension period will result in termination.

Others

Restrictions including admission, access, volunteering, training, or providing of other services or goods at OCH Regional Medical Center and other OCH premises will be imposed.

NOTE: This is the final page of the OCH Policy/Form. Next page contains history only.



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Reviewed/Revised Date	Title	Description of Change