**COVID-19 Vaccination and Exemption**

**Policy Number:** 3364-109-EH-605

**Department:**
- Infection Prevention and Control
- Hospital Administration
- Medical Staff

**Approving Officer:**
- Chief Medical Officer
- Chief of Staff
- Chair, Infection Control Committee

**Responsible Agent:** Infection Preventionist

**Scope:** Healthcare workers (HCW) as defined in scope

**Effective Date:** 12/01/2022

Initial Effective Date: 2/1/2022

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(A) **Policy Statement**

Healthcare workers (HCWs) reduce the personal risk of infection and reduce the spread of vaccine-preventable infections by receiving appropriate COVID-19 vaccines. Requirements within this policy are in accordance with the Centers for Disease Control and Prevention (CDC) guideline for Immunization of Health-Care Personnel and Centers for Medicare and Medicaid (CMS) Conditions of Participation. All vaccination policies will be applied consistent with amendments to state and federal laws and regulations that may occur prior to policy updates.

(B) **Purpose of Policy**

This policy is required by Department of Health and Human Services Centers for Medicare and Medicaid Services, 42 CFR Parts 482-486 and 494 and will be interpreted as the Centers for Medicare & Medicaid Services (CMS) Conditions of Participation changes. COVID-19 vaccination is the best protection against SARS-CoV-2 (the virus that causes COVID-19) transmission. Vaccination requirements within this policy are in accordance with the Centers for Disease Control and Prevention (CDC) health care personnel vaccination recommendations. The COVID-19 vaccination is available to all faculty, staff, students, and volunteers at the University of Toledo Medical Center (UTMC).

(C) **Scope**

Regardless of clinical responsibility or patient contact, this policy applies to the following hospital staff and other personnel, who provide any care, treatment, or other services for the hospital and/or its patients. These people are collectively “HCWs”:

1. University of Toledo Medical Center hospital and clinic employees
2. Licensed practitioners providing care at the University of Toledo Medical Center hospital and clinics
3. Students, trainees, and volunteers providing care at the University of Toledo Medical Center hospital and clinics
4. Staff who interact with other covered staff or patients in any location beyond the formal UTMC clinical setting (such as administrative offices, off-site meetings, etc.); and
(5) Individuals who provide care, treatment, or other services (direct patient care, indirect or non-patient care) for the UTMC and/or its patients, under contract or by other arrangement.

(6) This policy does not apply to:
   (a) Staff who exclusively provide telehealth or telemedicine services outside of the hospital setting and do not have any direct contact with patients and other staff referenced in section (C)(1)-(4) above; or
   (b) Staff who provide support services for the hospital that are performed exclusively outside of the hospital setting and who do not have any in-person interactions with patient or clients (direct or indirect) or any contact with other staff referenced in section (C)(1)-(4) above.

(D) Procedure

(1) Individuals covered by this policy must obtain and provide information to the University that the individual has:
   (a) Received the first dose of the 2-shot (e.g., Moderna or Pfizer) COVID-19 vaccine; or
   (b) Received a single dose of the 1-shot (e.g., Janssen) vaccine; or
   (c) Requested a religious or medical exemption to the COVID-19 vaccine.
      1. Risk mitigation strategies must be followed at all times if employee is unvaccinated for COVID-19.
      2. Medical exemptions must be requested for delay or temporary contraindications to vaccination, such as recent receiving monoclonal antibodies or convalescent plasma infusions (additional consideration will be granted based on CDC recommendations).

(2) Each individual covered by this policy must obtain and provide information to the University that the individual has:
   (a) Received a complete COVID-19 vaccine series and provided evidence to the University of the completion (e.g., Moderna or Pfizer); or
   (b) Received a complete COVID-19 vaccination series (as stated by manufacture) that is approved by the World Health Organization (WHO); or
   (c) Obtained a religious or medical exemption.

(3) Consequences for non-compliance will be as follows:
   (a) Failure of an employee to comply with the deadlines established in paragraph (1) or (2) above will result in progressive disciplinary action up to and including termination. Individuals covered by this policy who are not vaccinated or who do not have an approved exemption by the deadlines may receive progressive disciplinary action. Progressive disciplinary action will continue every three (3) days thereafter up to and including termination.
   (b) Failure of a student to comply with the guidelines established in paragraph (D)(1) or (D)(2) above will result in referral to a disciplinary process.
   (c) Failure to comply by a vendor or volunteer with the guidelines established in paragraph (D)(1) or (D)(2) above will result in potential termination of the relationship with the University. Volunteers who are subject to this policy and who are not compliant with the policy will not be permitted to volunteer for the University.
   (d) Vendors and contractors who are subject to the policy and who are not in
compliance with the policy may not provide services at University of Toledo Medical Center facilities.

(e) New employees: Refer to policy 3364-109-EH-603

(4) Registration:
(a) Once the COVID-19 vaccine series is fully completed (1-shot of the 1-dose series or 2-shots of the 2-dose series):
(i) An image of the COVID-19 Vaccination Record Card must be uploaded by the employee, faculty, staff, students and volunteer (that are subject to this policy) to the UT Toledo Vaccination Registry site: https://utvaccinereg.utoledo.edu/.
(ii) Individuals under the contractor, vendors or other third-party individuals who provide care, treatment, or other services (direct patient care, non-direct or non-patient care) for the hospital and/or its patients, under contract or by other arrangement or their individual agency, must furnish documentation of the completed COVID-19 vaccination series to UTMC management or provide information through a software management system.

(b) Individuals beginning or transferring into a position covered by this policy are required to be compliant prior to their start date.

(c) Individuals covered by this policy who are on an approved leave of absence, are required to comply with the policy prior to returning to work, school, or their position related to the University.

(d) Individuals with a pending request for a religious or medical exemption are considered exempt from this policy until exemption is reviewed.

(5) Boosters:
(a) Any covered individuals defined in section (C) above who have received a booster must upload documentation of the booster.

(b) Boosters will be tracked and managed in the same manner as the initial vaccination series.
(i) Individuals defined in section (C)(1)-(4) above are to upload documentation of any boosters received into https://utvaccinereg.utoledo.edu/.
(ii) Individuals defined in section (C)(5) above are to provide documentation to UTMC management or provide information through a software management system of any boosters received.

(6) Vaccination Exemptions: Exemptions to COVID-19 vaccination may be granted for documented medical contraindications or sincerely held religious beliefs.

(a) Medical exemption - Standard criteria for medical exemption will be established based upon recommendations from the CDC. Current recommendations are listed in the CDC's Interim Clinical Considerations for Use of COVID-19 Vaccines Currently Approved or Authorized in the United States: https://www.cdc.gov/vaccines/covid-19/clinical-considerations/covid-19-vaccines-us.html

1. Exemptions for COVID-19 vaccination may be granted for certain medical contraindications including:
   a. Severe allergic reaction (e.g., anaphylaxis) after a previous dose or to a component of the COVID-19 vaccine, or
b. Known diagnosed allergy to a component of the COVID-19 vaccine.

Complete and submit the Request for Medical Exemption from COVID-19 Vaccination to the UTtoledo Vaccination Registry site (https://utvaccinereg.utoledo.edu).

Medical Exemptions will be reviewed, signed, and dated by a licensed practitioner other than the requestor and the practitioner must be acting under their scope of practice.

(b) Religious exemption - May be granted if vaccination compromises sincerely held religious beliefs.


(c) Mitigation Strategy –

1. If an employee has went through the formal process and is not vaccinated, the individual will be notified that they must wear a tight-fitting mask KN95 mask or surgical mask that is securely tied around the neck and head as defined by the CDC at all times while in UTMC unless alone in an office with the door closed. In times of low transmission as defined by UTMC this requirement may be suspended.
   a. KN95 or surgical mask that is securely tied around the neck and head will also be required for partially vaccinated employees.

2. Unvaccinated individuals may be reassigned from providing care to high-risk, immunocompromised patients at management’s sole discretion and as circumstances permit.

3. Compliance will be enforced by the direct supervisor.

(d) Decisions determining eligibility for exemption are final and subject to reconsideration only when new supporting evidence for exemption need is provided.

(e) If an exemption is denied, individuals covered by this policy may appeal that decision by submitting additional information electronically to https://utvaccinereg.utoledo.edu using the COVID-19 Vaccination Decision Appeal Form within 10 days of date on the denial notice. If the denial notice is issued with less than 10 days remaining until the deadline for policy compliance, the appeal should be submitted immediately to allow time for review and communication of the decision before the compliance deadline.

(f) All forms are available after login at https://utvaccinereg.utoledo.edu.

(7) Individuals covered by this policy are required to wear a mask over their nose and mouth while in the hospital and clinics unless in a room that is separated by the general public and patients.

(a) Mask use may be reevaluated if the COVID-19 transmission level is determined to be at a low transmission level according to Centers for Disease Control (CDC).
(8) One-off vendors, volunteers, and professions who provide infrequent ad hoc non healthcare services are exempt:
   (a) Examples include equipment maintenance and elevator inspectors
   (b) Individuals may obtain clarification on their eligibility for this exemption by contacting Infection Prevention and their primary University of Toledo contact.

(9) Compliance Tracking-
   (a) Vaccination records will be tracked in the UToledo Vaccine Registry website, OHM, and manual records.

(10) HCW who require vaccination and who provide services that require them to visit external locations will be subject to the requirements of each location and may have to produce their vaccination documentation details or exemption status to that location.

References:


Approved by:

/s/ Michael Ellis, MD
Chair, Infection Control Committee
Date 11/28/2022

/s/ Andrew Casabianca, MD
Chief of Staff
Date 12/01/2022

/s/ Michael Ellis, MD
Chief Medical Officer
Date 11/28/2022

Review/Revision Completed By:
Human Resource, Flu Prep Committee, COVID-19 Prep Committee

Next Review Date: 10/25/2025

Policies Superseded by This Policy: