COVID-19 VACCINE POLICY 

***Chapter 6***

**Purpose:**

Washington County Public Health is required to enforce certain workplace protective measures to maintain compliance with the Centers for Medicare and Medicaid Services Conditions of Participation. Washington County Public Health has enacted this COVID-19 Vaccine Policy (“Policy”) which is based on Federal regulatory language found in 42 CFR § 484.70(d). This Policyrequires that all employees, including entities which are contracted to perform services for the agency, be fully vaccinated against COVID-19 or present appropriate documentation of medical or religious exemption from the COVID-19 vaccine(s).

**Scope:**

1. This Policy applies to all employees of Washington County Public Health, regardless of clinical responsibility or patient contact, provided the employee is a licensed practitioner, student, training, volunteer, or provides care, treatment or other services for Washington County Public Health and/or its patients under contract or by other arrangement.
2. This Policy does not apply to staff who exclusively provide telehealth or telemedicine services outside of the settings where home health services are directly provided to patients and who do not have any direct contact with patients, families, and caregivers, and other staff listed in paragraph I above. Additionally, staff who provide support services for Washington County Public Health that are performed exclusively outside of the settings where home health services are directly provided to patients and who do not have any direct contact with patients, families, and caregivers, and other staff listed in paragraph 1 above are not covered by this Policy.

**Definitions:**

1. Fully Vaccinated.
   1. Employees are considered fully vaccinated if it has been 2 weeks or more since they completed a primary vaccination series for COVID-19.
   2. The primary vaccination series for COVID which is defined as the administration of a single dose vaccine or all required doses of a multi-dose vaccine.
2. Approved Medical or Religious Exemption
   1. Employees may request an exemption from this mandatory vaccination policy if the vaccine is medically contraindicated for them, or if medical necessity requires a delay in vaccination, by religious exemption (theistic or non-theistic moral or ethical belief, observance or practice which is sincerely held with the strength of a religious view).
   2. Employees also may be legally entitled to a reasonable accommodation if they cannot be vaccinated and /or wear a face covering (as otherwise required by this policy) because of a disability, or if the provisions in this policy for vaccination, and/or testing for COVID-19, and/or wearing a face covering conflict with a sincerely held religious belief, practice, or observance.
   3. Requests for exemptions and reasonable accommodations must be initiated by the employee and presented to the Director of Nursing by February 14th, 2022. All such requests will be handled in accordance with applicable laws and regulations and Washington County Public Health’s policies and procedures for confidential medical information.

**Procedure:**

1. All Washington County Public Health employees covered by this Policy must be fully vaccinated against COVID-19 or present a completed medical or religious exemption (theistic or non-theistic moral or ethical belief, observance or practice which is sincerely held with the strength of a religious view) no later than March 15th, 2022.
2. All Washington County Public Health employees covered by this Policy must inform the Director of Nursing at Washington County Public Health of their vaccination status or their intent to pursue an appropriate exemption from the COVID-19 vaccine(s) by February 14th, 2022. This may be done verbally, in writing or by email. The employee’s response shall be stored.
3. Employees will be considered in compliance with this Policy if they are Fully Vaccinated or have an Approved Medical or Religious Exemption.
4. Employees may obtain their vaccination by:
   1. Scheduling with their own medical provider;
   2. Scheduling with another off-site vaccination provider; or
   3. Scheduling with an immunization nurse at Washington County Public Health.
5. All Fully Vaccinated employees shall provide proof of COVID-19 vaccination, regardless of where they received vaccination. Proof of vaccination status (methods listed below) shall be submitted to the Director of Nursing no later than March 15th, 2022. This information will be entered into MatrixCare by the Director of Nursing. Any paper copies of this information will be stored in accordance with accepted HIPAA guidelines.
   1. Acceptable proof of vaccination status is:
      1. The record of immunization from a healthcare provider or pharmacy;
      2. A copy of the COVID-19 Vaccination Record Card;
      3. A copy of medical records documenting the vaccination;
      4. A copy of immunization records from a public health, state, or tribal immunization information system; or
      5. A copy of any other official documentation that contains the type of vaccine administered, date(s) of administration, and the name of the healthcare professional(s) or clinic site(s) administering the vaccine(s).
6. All staff, regardless of vaccination status will certify weekly that they have not been experiencing two or more of the symptoms listed under “Mitigation Measures.”
   1. Once collected, the Director of Nursing will retain forms signed by WCPH employees to ensure documentation of mitigation efforts.
7. To receive an Approved Medical or Religious Exemption, employees shall submit exemption documentation using the standard Washington County Public Health form(s) included with this Policy. Acceptable proof of exemption is:
   1. A completed Washington County Public Health Medical Exemption form confirming the recognized clinical contraindications to COVID-19 vaccines and which supports staff requests for medical exemptions from vaccination, has been signed and dated by a licensed practitioner, who is not the individual requesting the exemption, and who is acting within their respective scope of practice as defined by, and in accordance with, all applicable State and local laws, and for further ensuring such documentation includes:
      1. 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
      2. A statement by the authenticating practitioner recommending that the staff member be exempted from Washington County Public Health’s COVID-19 vaccination requirements based on the recognized contraindications.
   2. A completed Washington County Public Health Religious Exemption form that has been stamped, signed and dated by a Notary.
8. Employees must provide truthful and accurate information about their COVID-19 vaccination status, and, if applicable, their testing results.

**Leave for COVID-19 Vaccination**

1. Employees may utilize up to two workdays of sick leave immediately following each dose of COVID-19 vaccine if they have side effects that prevent them from working.
2. Employees may be granted duty time to obtain the COVID-19 vaccine by requesting this through their direct supervisor per established leave policies and procedures.

**Employee Notification of COVID-19 and Removal from the Workplace**

1. Employees will immediately contact their supervisor to report illness as directed in the Employee Handbook. The employee’s direct supervisor will inform employee on next steps.
2. Washington County Public Health will require employees to promptly notify their supervisor when they have tested positive for COVID-19 or have been diagnosed with COVID-19 by a licensed healthcare provider.
3. Documentation of a positive test for COVID-19 will be required. This documentation may be from a testing center, medical provider or a photo that is date-stamped and signed by the employee of the results of a home COVID-19 test. Any paper copies of this information will be stored in accordance with accepted HIPAA guidelines.
4. Washington County Public Health will follow the documented Center for Disease Control and Prevention (CDC) guidelines for work exclusion and return to work.
   1. Leave policies will be followed as dictated in the Employee Handbook.

**Employees not Fully Vaccinated and with an Approved Exemption**

1. An employee covered by this Policy who is not Fully Vaccinated or granted a Medical or Religious Exemption may face discipline, up to and including termination.
   1. In the event of termination, Washington County Public Health shall immediately employ a replacement.

**Mitigation Measures**

* 1. All staff will adhere to daily self-screening for signs/symptoms (S/Sx) consistent with COVID-19 infection. S/Sx include the following:
     1. Fever
     2. Cough/congestion
     3. Loss of taste/smell
     4. Running nose
     5. Sore throat
     6. Headache/body aches
  2. All staff, regardless of vaccination status will certify weekly that they have not been experiencing two or more of the symptoms listed above.
     1. Once collected, the Director of Nursing will retain forms signed by WCPH employees to ensure documentation of mitigation measures.
  3. Staff with fever, or two or more other S/Sx of COVID-19 infection, will be excluded from work until the following criteria have been met:
     1. A negative COVID-19 test AND at least 24 hours have passed since last fever without the use of fever-reducing medications AND other symptoms have improved, or
     2. Five days have passed if no testing obtained AND at least 24 hours have passed since last fever without the use of fever-reducing medications AND other symptoms have improved AND the employee will wear a mask for an additional five days when around others individuals. (This requirement is subject to change based on the current CDC guidelines for symptomatic healthcare workers.)
  4. The use of a N95, KN95, or surgical grade mask will be required at all times during direct patient care.
  5. WCPH reserves the right to request an employee to produce a proctored COVID-19 negative test result in order for the exempt employee to continue reporting to work. Notification for this request will be made by the agency Administrator.

**Miscellaneous Mitigation Strategies**

All employees of Washington County Public Health, individuals and other entities providing services under contract or arrangement to patients and or clients of the agency, will be required to follow accepted Universal Precautions as outlined in the agency Standard Precautions Policy during hours of work. Employees providing direct patient care will be required to:

* Stay home when ill based on existing agency policy;
* Wear face coverings as above; and
* Observe and practice appropriate hand hygiene.

**Discipline**

Employees not in compliance with this Policy may be subject to measured disciplinary actions in accordance with the Washington County Public Health Employee Handbook.

**Return-to-Work**

The agency will follow the CDC guidance on return-to-work criteria as appropriate.

**New Hires**

All new employees must comply with the vaccination requirements outlined in this Policy as soon as practicable and as a condition of employment. Potential candidates for employment will be notified of the requirements of this Policy prior to the start of employment.

**Confidentiality and Privacy**

All medical information collected from individuals, including vaccination information, test results, and any other information obtained as a result of testing, will be treated in accordance with applicable laws and policies on confidentiality and privacy.