

UVA COMMUNITY HEALTH, INC. POLICY

<b>SUBJECT</b>	COVID -19 Vaccinations		
<b>NUMBER</b>	1005	<b>Effective Date:</b>	October 26, 2021
<b>TJC FUNCTION</b>	HR		
<b>APPLIES TO</b>	Culpeper Medical Center, Haymarket Medical Center, Cancer Center Gainesville, Medical Group, Prince William Medical Center, and Caton Merchant House		
<b>DEFINITION OF TERMS</b>	<p><b>UVA Community Health</b> - For purposes of this and all other UVA Community Health policies, the term “UVA Community Health” shall refer to Culpeper Medical Center, Haymarket Medical Center, Cancer Center Gainesville, Medical Group, Prince William Medical Center, and Caton Merchant House (Each an Entity and collectively “the Entities”).</p> <p><b>Team Members</b> All persons providing services, clinical, educational, administrative, volunteer or other services within or for the benefit of UVA Community Health including, Licensed Independent Practitioners (LIPs), regardless of employer.</p> <p><b>Licensed Independent Practitioners (LIPs)</b> -licensed independent practitioners who provide medical and clinical care to patients in accordance with state licensing laws, and who are duly credentialed and privileged to practice at a UVACH Entity. For purposes of this Policy, this definition includes, without limitation, physicians, (M.D. or D.O.), oral surgeons, podiatrists, general dentists, CRNAs, certificated nurse midwives, advance practice registered nurses (including nurse practitioners), physician assistants, and clinical psychologists.</p>		

- A. POLICY:** All Team Members shall be required to undergo the COVID-19 screening, vaccinations and tests defined in this Policy. These requirements may be augmented or revised from time to time at the direction of the UVA Community Health leadership. Team Members shall also be required to undergo any additional COVID-19 screenings, vaccinations, tests or other measures that UVA Community Health leadership determines necessary for infection control and patient safety.

Employee Occupational Health shall oversee and coordinate all screenings, vaccinations and tests required for/made available to Team Members as per this Policy. Unless otherwise stated, all required documentation described below shall be submitted to, and maintained by, Employee Health.

Team Members may apply for a medical or religious exemption from any requirement specified in this Policy, including any additional requirements imposed by UVA Community Health leadership from time to time.

**B. PROCEDURES:** Employee Health and UVA Community Health HR (UVACH HR) shall facilitate the completion of all requirements of this Policy.

Team Members may apply for an exemption from the requirements of this Policy for a medical reason, or a sincerely held religious belief, by submitting such request in writing in a form provided by Employee Health and including the information required (an "Exemption Request").

The designated review committee shall review all applications for Exemption Requests seeking medical exemptions, and UVACH HR shall review all applications for Exemption Requests seeking religious exemptions. In either case, the Team Member seeking an Exemption Request shall be provided with a written response to such request, and shall be afforded an opportunity to present additional information, if needed, in order to properly assess the request.

**C. REQUIREMENTS:**

1. By no later than November 1, 2021, all current Team Members must have completed primary vaccination against COVID-19.
2. Effective September 13, 2021, all newly hired Team Members must provide evidence of primary vaccination or approved exemption as part of their pre-employment screening. If not previously vaccinated, new team members must complete the vaccination series two weeks prior to beginning work.
3. COVID-19 vaccination shall be made available and administered at UVA Community Health facilities as communicated by UVA Community Health Leadership.
4. For purposes of this policy, Team Members shall be considered to have completed primary vaccination after receiving a complete series (as applicable) of a COVID-19 vaccine approved or authorized for use (EUA) by the U.S. Food and Drug Administration or listed on the World Health Organization (WHO) Emergency Use List (EUL).
5. Team Members who are not fully vaccinated including (i) those who have been granted an exemption and who are in the process of primary vaccination, must comply with all directives of UVA CH leadership related to mitigation of COVID-19 risk to employees and patients, including, without limitation, weekly testing, masking etc., until otherwise directed.
6. At this time, all Team Members are strongly encouraged, but not required, to receive a booster dose of vaccine six (6) months after completing primary vaccination with Pfizer or Moderna vaccine OR two months after receiving J&J vaccination dose and such other booster or additional doses as may be recommended by the CDC.

**D. DOCUMENTING VACCINE STATUS:**

1. Newly hired Team Members can meet the requirements of this Policy by providing proof of completed primary vaccination to Employee Health.
2. Current Team Members who were vaccinated at a UVA Community Health facility shall not be

**(SUBJECT: COVID-19 Vaccinations)**

required to provide any additional documentation of vaccination status unless requested by Employee Health. Current Team Members who were vaccinated through non-Health System providers (i.e., private physicians, local pharmacies, etc.) and/or who did not schedule their vaccinations through a UVA Community Health facility shall provide proof to Employee Health.

- a. Proof of vaccination shall consist of a scanned image or photo of a Team Member's immunization records, such as a CDC card or official medical record, submitted with UVA computing ID. Any other forms of documentation of vaccination will be reviewed on a case-by-case basis.
- b. Vaccinated Team Members who have lost their CDC card should contact their vaccination site for a replacement.

**E. OBTAINING A VACCINE:**

1. Team Members who have not completed primary vaccination or those wish to obtain a booster and have not yet done so should make arrangements to receive primary vaccination or booster at any vaccination site. Team Members may arrange with their managers to schedule primary vaccination, booster or testing as appropriate, including during scheduled work hours.
2. **Primary Vaccination for Team Members who were previously infected:** Team Members who were previously infected with COVID-19 should make arrangements to be fully vaccinated, with their first primary vaccination dose after CDC criteria for returning to work have been met ([www.cdc.gov](http://www.cdc.gov)).
3. **Booster Vaccination for Team Members who were previously infected:** Team Members who were previously infected with COVID-19 will be eligible to receive a booster, if desired, after CDC criteria for returning to work have been met ([www.cdc.gov](http://www.cdc.gov)).

**F. SPECIFIC REQUIREMENTS FOR APPLICATION FOR EXEMPTIONS:**

Team Members may submit a request for an exemption from the requirements on the grounds set forth below.

1. Team Members (both current and newly hired) may apply for exemption from required vaccination by completing the provided medical exemption forms and submitting it to Employee Health via the designated avenues.
  - a. Prior COVID-19 illness shall not establish grounds for a medical exemption from the COVID-19 vaccine requirement. Team Members who received monoclonal antibody treatment for COVID-19 will be allowed to defer vaccination for 3 months from the last date of their treatment with monoclonal antibody product, but they must initiate the process to become fully vaccinated at the conclusion of that 3-month period.
2. Team Members may also apply for exemption from required vaccination based on a

(SUBJECT: COVID-19 Vaccinations)

sincerely held religious belief by submitting a Faith-Based Exemption Request consistent with this Policy via Employee Health via the designated avenues.

3. Team Members granted an exemption for any reason must continue to mask in accordance with current guidelines, and follow all other requirements established by UVA Community Health leadership.
4. Exemption Requests from the booster requirement by team members who were denied exemption from primary vaccination will not be considered unless the Team Members' situation has changed, such that they will be submitting new medical or religious information that was not available at the time of their original request; if new medical information is submitted, it must include evidence of a medical problem or diagnosis not documented in the prior Exemption Request.

**G. Enforcement:**

1. Team Members who are LIPs and who are (i) members of a UVACH medical staff and/or have clinical privileges and (ii) *not employed by a UVACH Entity*: Those LIPs who have not completed the COVID-19 vaccination process by November 1, 2021, at 11:59pm and have not been granted a medical or faith-based exemption shall be placed on administrative leave in accordance with processes and requirements set forth in applicable medical staff bylaws and policies.
2. All other Team Members: Those Team Members who have not completed the COVID-19 vaccination process by November 1, 2021, at 11:59pm and have not been granted a medical or faith-based exemption shall be subject to corrective action consistent with relevant HR policies and such other policies, procedures and processes of UVA Community Health as may be applicable. Sanctions may range from reprimand to suspension or termination of employment or other disciplinary action, in accordance with applicable Human Resources and credentialing procedures.

**Submitted by: Quality**

Legacy Data	Policy Name, Adopted/Revised Date
Culpeper Medical Center	N/A
Novant Health	N/A

**APPROVED BY:**

Title	Approved By	Signature	Date
Chief Executive Officer	Erik Shannon	See Electronic Approval	
Chief Quality Officer	Michelle Strider	See Electronic Approval	

**COMMITTEES APPROVED BY:**

Committee	Chairperson/Designee	Date
Culpeper Memorial Hospital MEC	Shiv Khandelwal, M.D.	10/06/2021, 1/26/2022
Prince William Medical Center MSEC	Ross Switkes, M.D.	09/27/2021, 1/26/2022