

## Sparrow Health System Policy

**Title:** Caregiver COVID-19 Vaccination Policy

**Department:** Infection Prevention & Epidemiology

**Replaces:** New



**Effective Date:** 12/05/2021

The reduction of risks associated with COVID-19 is consistent with Sparrow Health System’s mission statement:

*“Improving the health of the people in our communities by providing quality, compassionate care to everyone, every time.”*

**1.0 Policy:** To establish standards for required COVID-19 immunization and infection prevention practices, outside of those with approved medical or religious exemption, that are consistently communicated and enforced throughout Sparrow Health System. The below policy is also to meet the requirements under the Centers for Medicare and Medicaid Services (CMS) Omnibus COVID-19 Health Care Vaccine interim final rule and the Occupational Health and Safety Administration’s (OSHA) Healthcare COVID Emergency Temporary Standard in order to provide a safe and healthy environment for Caregivers, patients, members and visitors. Policy is subject to change as required by law or regulation.

**2.0 Scope:** (Select all that apply)

<input checked="" type="checkbox"/> Michigan Athletic Club	<input checked="" type="checkbox"/> Physicians Health Plan	<input checked="" type="checkbox"/> Sparrow Care Network
<input checked="" type="checkbox"/> Sparrow Carson Hospital	<input checked="" type="checkbox"/> Sparrow Clinical Research Inst	<input checked="" type="checkbox"/> Sparrow Clinton Hospital
<input checked="" type="checkbox"/> Sparrow Eaton Hospital	<input checked="" type="checkbox"/> Sparrow Home Care	<input checked="" type="checkbox"/> Sparrow Home Hospice
<input checked="" type="checkbox"/> Sparrow Hospice House	<input checked="" type="checkbox"/> E.W. Sparrow Hospital	<input checked="" type="checkbox"/> Sparrow Ionia Hospital
<input checked="" type="checkbox"/> Sparrow Laboratory	<input checked="" type="checkbox"/> Sparrow Medical Group	<input checked="" type="checkbox"/> Sparrow Medical Supply
<input checked="" type="checkbox"/> Sparrow Pharmacy Plus	<input checked="" type="checkbox"/> Sparrow Specialty Hospital	<input checked="" type="checkbox"/> Sparrow Health System

**In addition, if applicable: (select one)**

- This policy applies to all patient care areas.
  - This policy applies to inpatient care areas using EPIC/iSparrow EMR.
  - This policy applies to Emergency Department areas using EPIC/iSparrow EMR.
  - This policy applies to Sparrow Health System outpatient or ambulatory sites that have EPIC/iSparrow EMR.
- A. The Caregiver COVID-19 Vaccination Policy applies to all persons providing services for Sparrow Health System including without limitation Caregivers, volunteers, students, residents, fellows, all employed and/or privileged physicians and Allied Health Practitioners.
- B. New Caregivers joining Sparrow will be notified of the policy and will be expected to comply prior to Employment and maintain ongoing compliance with infection prevention requirements if approved for vaccine exemption, or until/unless reaching and maintaining fully vaccinated status.

### 3.0 Definitions:

Term	Definition
Caregivers	For the purposes of this policy includes but is not limited to: all persons providing services for Sparrow Health System including Caregivers, volunteers, students, residents, fellows, all employed and/or privileged Physicians and Allied Health Practitioners.
Established Phase One Compliance Date	For the purposes of this policy, the “Established Phase One Compliance Date” is the date designated by Sparrow Health System, as the date upon which Sparrow Caregivers must have either received the first dose of a COVID Vaccine, and records provided to Employee Health, or Caregiver must complete a request for exemption from the COVID vaccine.
Established Phase Two Compliance Date	For the purposes of this policy, the “Established Phase Two Compliance Date” is the date designated by Sparrow Health System as the date by which Sparrow Caregivers must be on record with Employee Health as either fully vaccinated, or having received approved vaccine exemption and initiating required routine COVID testing.
COVID-19 Season	The period during which COVID-19 is deemed to be active in the community as determined by Sparrow Health System Infection Prevention and Epidemiology in consultation with local public health officials.
Exemption	Caregivers requesting lawful exemption from COVID vaccine due to validated medical contraindication or sincerely held religious belief, practice or observance. Exemptions are subject to review and approval.
Fully Vaccinated	Caregivers are deemed fully vaccinated two-weeks following receipt of the final dose in a COVID vaccine series, or two-weeks following receipt of a single-dose COVID vaccine. Caregivers may be required to receive COVID vaccine booster(s) to maintain Fully Vaccinated status based on recommendations from the CDC and/or FDA. Updates will be made to this policy as needed to reflect changes in definition of fully vaccinated consistent with federal and state regulations.
Unvaccinated	Caregivers are deemed unvaccinated who are not on record with Employee Health Services as meeting the fully vaccinated definition above.

### 4.0 Responsibilities, Structure & Process:

#### COVID Vaccine Compliance:

- A. Sparrow Health System will set the relevant dates of the anticipated COVID-19 Season in consultation with local and or state public health officials.
  - Current COVID season began March of 2020 and has no end date.
  - Established **Phase One compliance date** for Caregivers and Providers who are not fully vaccinated **is December 5<sup>th</sup>, 2021**
  - Established **Phase Two compliance date is January 4<sup>th</sup>, 2022**
  
- B. All Sparrow Health System Caregivers, are responsible for complying with, and ensuring that other Caregivers comply with this policy by **doing one of the following by the Established Phase One Compliance Date:**
  - **Providing evidence of at least one dose of COVID vaccine to Employee Health Services**
    - Caregivers will be provided access to COVID vaccine at no cost at Sparrow-designated COVID vaccine sites.

Caregivers electing to be vaccinated at a non-Sparrow location are responsible for any incurred costs.

- Caregivers who receive(d) COVID vaccine from a Sparrow Caregiver vaccine clinic have their vaccine on record with Employee Health Services. Caregivers are required to maintain a copy of their COVID Vaccination record in the event it is needed for validation.
- Caregivers who receive(d) a COVID vaccine from a non-Sparrow location do so at their own expense and must submit proof of COVID vaccine to Employee Health Services through email or other established electronic reporting method to be on record as compliant.
- During high levels of COVID activity, Infection Prevention and Epidemiology may require vaccinated Caregivers to wear masks or take other precautions while on duty until the risk has decreased.
- **Submit request for exemption from COVID vaccine by completing COVID Vaccine Exemption Request form**
  - Caregivers must submit the COVID-specific vaccine exemption request form, located on the Sparrow intranet.
  - Any previous influenza vaccine exemptions requests do not constitute request for exemption from the COVID vaccine.
  - For information on the COVID Exemption request process, please see COVID Vaccine Exemption Process below.
- Caregivers, regardless of vaccination status, who do not pass electronic COVID screening based on symptoms must still follow the process for symptomatic COVID testing at a Sparrow testing facility, under the direction of COVID Employee Health Services (COVID EHS).

C. All Sparrow Health System Caregivers are responsible for complying with, and ensuring that other Caregivers comply with this policy by **doing one of the following by the Established Phase Two Compliance Date:**

- **Providing evidence of fully vaccinated status to Employee Health**
  - Caregivers will be provided access to COVID vaccine at no cost at Sparrow-designated COVID vaccine sites. Caregivers electing to be vaccinated at a non-Sparrow location are responsible for any incurred costs.
  - Caregivers who receive(d) COVID vaccine from a Sparrow Caregiver vaccine clinic have their vaccine on record with Employee Health Services. Caregivers are required to maintain a copy of their COVID Vaccination record in the event it is needed for validation.

- Caregivers who receive(d) a COVID vaccine from a non-Sparrow location do so at their own expense and must submit proof of COVID vaccine to Employee Health Services through email or other established electronic reporting method to be on record as compliant.
- During high levels of COVID activity, Infection Prevention and Epidemiology may require vaccinated Caregivers to wear masks or take other precautions while on duty until the risk has decreased.
- **Receive confirmation of approved exemption from COVID Vaccine**
  - Unvaccinated Caregivers who have been approved for an exemption to the COVID Vaccine are required to follow approved infection control practices as determined by federal or state regulations, and Infection Prevention and Epidemiology during COVID Season. This includes wearing of face masks at all times when in patient care or public areas, regardless of physical distancing, and when within six (6) feet of others when in non-patient care or public areas.
  - Names of all unvaccinated Caregivers will be provided to Sparrow leadership, as necessary, to ensure that approved infection control practices consistent with federal and state requirements, in addition to those determined by Infection Prevention and Epidemiology are complied with during COVID Season.
  - For information on the COVID Exemption request process, please see COVID Vaccine Exemption Process below.
- Caregivers, regardless of vaccination status, who do not pass electronic COVID screening based on symptoms must still follow the process for symptomatic COVID testing at a Sparrow testing facility, under the direction of COVID Employee Health Services (COVID EHS).

### **COVID Vaccine Exemption Process**

- A. Caregivers and Providers, including privileged Physicians/Allied Health Practitioners, seeking exemption from the COVID Vaccine on the basis of medical contraindication, disability, or a sincerely held religious belief, practice or observance must submit a COVID Exemption Request no later than the Established Phase One Compliance Date.
  - Medical Exemption Requests will require the following in order to effectuate review:
    - All documentation confirming recognized clinical contraindications to COVID-19 vaccines which supports Caregiver's request must be signed and dated by a licensed practitioner acting within their scope of respective practice, and who is not the individual requesting the exemption.
    - Documentation must specify which of the authorized COVID-19

- vaccines are clinically contraindicated for the Caregiver to receive and the recognized clinical reasons for the contraindications.
- Documentation must contain a statement from the authenticating practitioner recommending that the Caregiver be exempt from the COVID-19 vaccinations based on the recognized clinical contraindications.
  - The Center's for Disease control guidance on medical contraindications for the COVID vaccines will govern medical exemption review.
- Religious Exemption Requests on the basis of sincerely held beliefs will require the following in order to effectuate review:
    - Explanation of how the Caregiver's religious belief conflicts with the COVID-19 vaccination requirement.
    - Description of how complying with the COVID-19 vaccination requirement would substantially burden the Caregiver's religious exercise or conflict with the Caregiver's sincerely held religious beliefs, practices, or observances.
    - Caregivers may be asked to explain the religious nature of their belief or provide additional information as needed to facilitate effective review.
    - Objections to COVID-19 vaccination that are based on social, political, or personal preferences, or on nonreligious concerns about the possible effects of the vaccine, do not qualify as "religious beliefs" and will not qualify for approved exemptions.
  - All persons who have approved exemption from the vaccination must acknowledge and agree to abide by approved infection control practices as determined by federal or state regulations, and Infection Prevention and Epidemiology during COVID Season. This includes wearing of face masks at all times when in patient care or public areas, regardless of physical distancing, and when within six (6) feet of others when in non-patient care or public areas. This acknowledgement will be contained within the exemption request form.

## **Compliance**

- A. Caregivers who provide false or inaccurate information to Employee Health Services, or on electronic Caregiver screening application/website will be subject to formal corrective/disciplinary action up to and including termination of employment under HR policy 601: Caregiver Standards and Work Rules.
- B. Caregivers who are not compliant with the Phase 1 requirements by the Phase 1 Compliance Date will be removed from the schedule consistent with federal regulation.
- C. Caregivers who are have neither completed a COVID vaccination series, nor received approved exemption from the COVID vaccine, by the Phase 2 Compliance Date will be removed from the schedule consistent with federal regulation.
- D. Sparrow Health System Caregivers failing to comply with this policy will be subject to formal corrective action, up to and including termination of employment under HR policy 601: Caregiver Standards and Work Rules.

- E. Medical Staff members and Allied Health practitioners in violation of the policy will be considered unfit to practice. Medical Staff members and Allied Health Practitioners who do not comply by the established compliance date will be referred to the Medical Staff Executive Committee for determination of next steps, consistent with the terms of the Medical Staff Bylaws.

**5.0 Keywords:** Not Set COVID, COVID vaccine

**6.0 Related Policies:** HR Policy 601: Caregiver Conduct and Work Rules

**7.0 Supporting Documentation and/or References:** None

**8.0 Revision History and/or Approval:**

Date	Version Number	Changes	Referenced Section
11/17/2021	1	New policy created for Sparrow Health System to meet standards of the new federal CMS Omnibus COVID-19 Health Care Vaccine interim final rule and the OSHA Healthcare ETS.	All

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