



**Hospital:** System-Wide

**Division:** Human Resources and Government Relations

**Policy & Procedure**

**Policy #:** 7500-04-26

**Origination Date:** September 1, 2021

**Latest Review/Revision:** June 20, 2022

**Administrative Approval:** Ms. Melanie Stith

**Administrative Title:** Chief People Officer and Government Relations Officer

**Originator (Title):** \_\_\_\_\_

---

**Subject: Mandatory COVID-19 Vaccination**

**Page 1 of 4**

---

**APPLICABILITY:** This policy applies to all Roper St. Francis Healthcare (RSFH) facilities and locations, including Roper Hospital, Bon Secours St. Francis Xavier Hospital, Roper St. Francis Mount Pleasant Hospital, Roper St. Francis Hospital-Berkeley, and any departments owned or operated by these Hospitals, as well as Roper St. Francis Physician Partners Network, Roper St. Francis Foundation and any other RSFH entity.

**POLICY:** RSFH requires all RSFH Workforce Members, defined below, to become fully vaccinated for COVID-19 by published deadlines. All RSFH Workforce Members who qualify for a medical or religious exemption will wear a mask as dictated by RSFH guidelines at all times when working at any RSFH facility or location and will abide by all other rules and directives of RSFH from time to time regarding COVID-19 risk mitigation practices.

**PURPOSE:** COVID-19 is a highly contagious disease that can be spread before symptoms appear, and our patients and workforce members are particularly vulnerable to the dangers of this virus. Vaccination of healthcare workers has been shown to prevent illness and death in patients and reduce viral infections and absenteeism among health care workers. The CDC recommends that all healthcare workers get fully vaccination for COVID-19. Additionally, RSFH seeks to comply with the Center for Medicare and Medicaid Services (CMS) requires regulatory requirements that all healthcare workers in CMS facilities be fully vaccinated for COVID-19 or obtain an appropriate exemption.

**DEFINITIONS:**

26.1 **RSFH Workforce Members** include:

- a) all employed teammates (employees) and providers.
- b) all non-employed individuals who come onsite to a RSFH facility or location to work, learn or provide any services, including but not limited to:
  - 1. licensed practitioners, including all members of the medical staff (regardless of privileges);
  - 2. students and trainees;
  - 3. volunteers;
  - 4. contracted staff.

5. temporary workers: and vendors who will be present in an RSFH CMS Regulated Facility (including a hospital, a hospital-based service, hospice, or home health). or other CMS regulated facility.

26.2 **Fully Vaccinated:** “fully vaccinated” means that a Workforce Member has had the number of shots recommended by the manufacturer, which may change from time to time based on the scientific evidence available. A schedule of COVID vaccinations currently accepted and the number of shots recommended by the manufacturer is attached in **Appendix A** (which may be updated from time to time).

#### **PROCEDURES:**

26.3 **Mandatory Vaccination:** On November 5, 2021, The Center for Medicare and Medicaid Services (CMS) issued a vaccine mandate that requires all healthcare workers to be fully vaccinated for COVID-19. All RSFH Workforce Members are required to be fully vaccinated against COVID-19 by the vaccination due dates communicated through corporate communications. These dates may be adjusted from time to time by RSFH as needed during the course of the pandemic to address future vaccine and public health information and guidance.

26.4 **Mandatory Compliance:** Compliance with this vaccination policy is a condition of employment for those who are employed or seeking employment with RSFH. New teammates must be fully vaccinated or have an approved exemption before beginning employment. Compliance with this policy is a requirement for Medical Staff Membership. Non-employed Workforce Members may not be present in any RSFH CMS Regulated Facility (including a hospital, a hospital-based service, hospice, or home health) or other CMS regulated facility unless they are fully vaccinated.

26.5 **Leaves of Absence:** Any RSFH Workforce Member returning from an approved leave of absence on or after applicable vaccination due date will be required to be fully vaccinated or have an approved exemption before return to work.

26.6 **Vaccine Locations:** The COVID-19 vaccine may be obtained at RSFH Express Care, a RSFH Physician Partner Practice (as available) or any other RSFH vaccine site as may be established from time to time. The RSFH locations do not charge a fee to those receiving a vaccine. The vaccine may also be provided by an outside source such as a drug store, private physician’s office or public clinic, etc.

#### **EXEMPTIONS:**

26.7 **Exemption Types:** There are two allowed exemptions to the mandatory COVID-19 vaccination(s): a medical exemption and a religious exemption.

a) **Medical Exemption:** A medical exemption may be granted to accommodate disabilities and for medical criteria consistent with those published by public health authorities and/or the Centers for Disease Control (CDC) which may change from time to time based on the scientific evidence available. Medical exemptions may be permanent (i.e. a severe allergic reaction to the COVID 19 vaccination or other underlying condition) or temporary (i.e. 90 days to receive vaccination after having COVID-19).

b) **Religious Exemption:** a religious exemption may be granted to accommodate an individual’s sincerely held religious belief, practice, or observance. Social, political, and economic philosophies, and mere personal preferences, do not constitute religious beliefs.

26.8 **Requests for Exemptions (employed RSFH Workforce Members):** requests for exemptions should be made using the process described below. Requests will be considered on a case-by-case basis and may be granted if they meet the criteria for the exemption and do not pose an undue

---

hardship on RSFH or pose a direct threat to the health and safety of others. RSFH Workforce members are expected to fully cooperate in this process and timely provide requested documentation and information so that RSFH can evaluate the request. Failure to timely request an exemption, incomplete forms or failure to provide requested documentation may result in the request being denied.

- a) **Medical Exemption Request:** RSFH Workforce Members requesting exemption due to a disability or due to medical criteria should fill out the **Medical Exemption Form** which includes a medical certification that must be completed by a licensed provider - physician, physician's assistant or nurse practitioner. The Medical Exemption Form can be located and must be returned to the RSFH Teammate Health Vaccination Exemption Portal ([www.rsfh.com/exemption](http://www.rsfh.com/exemption)) by the published exemption due date. RSFH will respond to Employed RSFH Workforce Member requests for medical exemption in writing. If an exemption is granted for a temporary condition, it will be assigned an expiration date. The RSFH Workforce Member will be required to submit an additional Medical Exemption Form at least 7 days prior to the expiration date if the individual is seeking an additional accommodation. RSFH reserves the right to rescind medical exemption approvals based on CMS and/or CDC guidance.

**Religious Exemption Request (employed RSFH Workforce Members):** RSFH Workforce Members requesting a religious exemption should fill out a **Religious Exemption Form** which can be located and must be returned to the RSFH Teammate Health Vaccination Exemption Portal ([www.rsfh.com/exemption](http://www.rsfh.com/exemption)) by the published exemption due date.

- 26.9 **On-Site Requirements for RSFH Workforce Members with Exemptions:** All RSFH Workforce Members who qualify for a medical or religious exemption shall minimize the risk of transmission and must wear a mask at all times while in an RSFH facility.

## VACCINATION COMPLIANCE

- 26.10 **Evidence of Vaccination (employed RSFH Workforce Members):** Teammate Health will maintain evidence of vaccination(s) or exemptions for all RSFH Workforce Members employed by RSFH. If an employed RSFH Workforce Member receives the vaccine at a non-RSFH location, he/she must provide a complete immunization record that identifies the name, type of vaccine administered (Pfizer, Moderna, etc.), the vaccine lot number and date of vaccination(s) to Teammate Health by the published vaccination due date to comply with the mandatory vaccination requirement. A clear photo of the vaccination card can be emailed to [RSFHTeammateHlthCOVID@rsfh.com](mailto:RSFHTeammateHlthCOVID@rsfh.com). It is each employed RSFH Workforce Member's responsibility to ensure that his/her vaccine status is marked complete in the myHR system prior to the published vaccination due date.

### Evidence of Vaccination or Exemption (non-employed RSFH Workforce Members)

- 26.11 **Compliance:** For employed RSFH Workforce Members, failure to follow the mandatory vaccination policy or providing false information in connection with the policy will be addressed with corrective action, as appropriate for the individual, up to and including termination of employment. For non-employed RSFH Workforce Members, failure to follow the mandatory vaccination policy or providing false information in connection with the policy will result in corrective action, as appropriate, up to and including termination of the individual's ability to provide or participate in any activity or service at a RSFH facility or location.
-

**APPENDIX A**

<b>Vaccine developer:</b>	<b>Pfizer - Comirnaty</b>	<b>Moderna</b>	<b>Johnson &amp; Johnson</b>
<b>FDA Approval</b>	Approved	Emergency Use Authorization	Emergency Use Authorization
<b>Who is it recommended for?</b>	People 16 years and older	People 18 years and older	People 18 years and older
<b>How many shots do you need to be fully vaccinated?</b>	Two doses	Two doses	One dose

---