Policy: COVID-19 Vaccination Program

Type: SYSTEM

Applicable To: Covered Individuals as defined in the Policy

Policy Owner: Human Resources

Effective Date: May 21, 2021; Revised: June 27, 2021; July 26, 2021; August 26, 2021

Approved by: Martin S. Everhart, RWJBH Chief Human Resources Officer

DOCUMENTS:

All employee forms are electronically available via Employee Self Service. The Attestation form for contracted medical staff is available via the Medical Affairs Office; Attestation Forms for clinical students are available via the department manager; Volunteer Forms are available from the department director; Vendor Attestation Forms are available via the on-line vendor process; and Children’s Specialized employee forms are available via the Human Resources Department at Children’s Specialized Hospital.

PURPOSE:

RWJBarnabas Health (RWJBH) is committed to protecting our patients, each other, and visitors from exposure to COVID-19 at our facilities and therefore has established and implemented a COVID-19 Vaccination Program beginning with RWJBH employees who hold the title of supervisor or above, effective May 21, 2021 and effective July 26, 2021 for all Covered Individuals. The program is mandatory for all Covered Individuals, as defined below and is consistent with the Centers for Disease Control and Prevention (CDC) recommendations on COVID-19 Vaccine administration.

POLICY:

Vaccination against COVID-19 is mandatory for all Covered Individuals unless such Covered Individual is an Exempted Individual. Any Exempted Individual must comply with any order/decrees applicable to RWJBH facility and/or unvaccinated individuals, and wear a facemask, provided by the RWJBH Facility, at all times while at work, unless Covered Individual provides prior written proof of high sensitivity to materials on their faces that prevents them from wearing a mask, in accordance with the CDC guidance.

DEFINITIONS:

1. “Covered Individuals” means any RWJBH facility employee, as well as, all students, residents, fellows, all members of the medical staff, all providers credentialed by the medical staff, volunteers, and vendors, including contracted service providers providing services at any RWJBarnabas Health, regardless of clinical responsibility and/or anticipated patient contact.

2. “COVID-19 Vaccine” defined as the FDA approved or authorized vaccine to be
immunized against SARs-CoV-2 that is approved for use by the CDC.

3. “Employed CI” means Covered Individuals who are employees of a RWJBH facility.

4. “Exempted Individuals” means an Employed CI who receives an approved medical exemption, religious exemption, or is exempt by a collective bargaining agreement which agreement covers services rendered at RWJBarnabas Health facilities or is a Covered Individual, other than an Employed CI, who provides a completed Attestation Form.

5. “Full Compliance” defined as having received an approved one dose (e.g. Jansen) or two dose series (e.g. Pfizer, Moderna) required COVID-19 vaccine or an approved Exemption.

6. “Fully Vaccinated” defined as two weeks following the last required dose of the applicable COVID-19 Vaccine(i.e. For now, two weeks after the Jansen vaccine or two weeks of the second dose of the Pfizer BioNTech (FDA approved version known as “Comirnaty”) or Moderna Vaccine).

“RWJBH Facility” means RWJBarnabas Health, Inc. and any of its wholly-owned affiliates.

**PROCEDURE:**

1. **TIMELINE:**
   
   A. For an Employed CI:
      
      i. All Employed CI who hold the title of supervisor or above and employed prior to June 1, 2021 must be in Full Compliance no later than July 15, 2021.
      
      ii. All Employed CI, other than those who hold the title of supervisor or above, and employed prior to July 1, 2021 must be in Full Compliance no later than October 15, 2021.
      
      iii. All Employed CI who are employed before July 1, 2021 must be in Full Compliance no later than October 15, 2021.
      
      iv. New Hires: Please refer to Section 4 below.

   B. All Covered Individuals, other than Employed CI, must be in Full Compliance no later than October 15, 2021, unless they are engaged after October 1, 2021, in which case, then must achieve Full Compliance of the COVID-19 vaccination within 60 days of their date of commencement or must complete an attestation Form and submit proof of an approved exemption consistent with the requirements below prior to the date of commencement. Any new students, non-employed residents, and non-employed fellows shall complete and submit the Attestation Form within ten (10) days of hire/appointment and prior to reporting to the department.
2. **ADMINISTRATION OF THE COVID-19 VACCINE**: Covered Individuals may register and receive the COVID-19 Vaccine from any vaccination site located in the United States. For Covered Individuals requesting the COVID-19 Vaccines from an RWJBH facility, the process will include the following:

- Register in PeopleSoft via Employee Self Service.
- Register through our website at [www.RWJBH.org/covid19vaccine](http://www.RWJBH.org/covid19vaccine) (be sure to include your employee ID number on the website registration form), and shortly after, you will receive a scheduling link to make an appointment at any of our facilities.
- Or, use the desktop shortcut available on all RWJBH computers and workstations. You can access the shortcut with your employee ID and date of birth. You must be logged into the network either onsite of via VPN or Citrix to do so. The desktop shortcut is named COVID-19 Vaccine Scheduling – The URL is [https://hcweb.rwjbh.org/CVSS](https://hcweb.rwjbh.org/CVSS).

3. **EDUCATION MATERIAL**: When scheduling a vaccination at a RWJBH site, Covered Individuals will receive a copy of the FACT SHEET FOR RECIPIENTS AND CAREGIVERS specific to the vaccine they will receive. Copies can also be found on the COVID-19 microsite on The Bridge at the following link: [https://thebridge.rwjbh.org/system/coronavirus.aspx](https://thebridge.rwjbh.org/system/coronavirus.aspx).

4. **NEW HIRES**: All new hired Employed CI hired after July 1, 2021, will be required to:
   
   A. Provide a completed CDC issued COVID-19 Vaccination card during the New Hire Physical process; or achieve Full Compliance of the COVID-19 vaccination within two (2) months of their date of hire or furnish any exemption requests (medical or religious) during the New Hire Physical process based on the referenced documentation listed under the exemption portion of the policy as a condition of employment.
   
   B. For any exemption requests, newly hired Employed CI shall furnish any exemption requests (medical or religious) during the New Hire Physical process based on the referenced documentation listed under the exemption portion of the policy as a condition of employment.
   
   C. Any new hire that receives an approved exemption will then be considered an Exempted Individual, and subject to those requirements, including masking consistent with non-vaccinated individuals.
      
      i. Exemption requests not finalized prior to the new hire’s start date will require the new hire to follow the non-vaccinated masking guidelines until final review is rendered.
      
      ii. If the exemption request is not approved, the new hire will have seven (7) business days to obtain the one dose series or one dose of the two-dose
series COVID-19 vaccination or be subject to separation from employment in accordance with this policy.

5. **APPROVED LEAVE OF ABSENCE.** Any Employed CI who is on an approved leave of absence through October 15, 2021 must achieve Full Compliance within 60 days of their return from the approved leave of absence.

6. **MASKING AND SAFETY REQUIREMENTS:** For Exempted Individuals and those Employed CI awaiting a decision regarding a requested exemption, it is mandatory to properly wear a facemask (surgical and procedural masks will be available at the facility) at all times. When taking a meal and/or other break(s) during their scheduled shift, Covered Individuals must adhere to the established safety requirements.

7. **ADMINISTRATION OF THE VACCINATION TO COVERED INDIVIDUALS:**
   A. Employees who receive the COVID-19 vaccine at an RWJBH location will be provided with a COVID-19 Vaccine FACT SHEET FOR RECIPIENTS AND CAREGIVERS specific to the vaccine they will receive.
   B. Determine if Employee is appropriate for vaccination by obtaining a brief medical history.
   C. Document consent, administration of vaccine, name of manufacturer, lot number and expiration date.
   D. File and maintain consent forms and administration records for all Covered Individuals through the customary record retention process.
   E. Record the number of Covered Individuals vaccinated and/or otherwise in compliance with this policy.
   F. Covered Individuals who have received the COVID-19 vaccination at another facility, pharmacy, or physician’s office must provide proof of immunization.

8. **EXEMPTION PROCEDURES AND IDENTIFICATION:**
   - For Employed CI, other than those Employed CI holding a title of supervisor or above, hired before July 1, 2021 requesting a medical exemption or a religious/sincerely held belief exemption must be completed and submitted with the appropriate Request Form, by August 27, 2021.
   - For Employed CI hired after July 1, 2021 requesting a medical exemption or a religious/sincerely held belief exemption shall complete and submit the appropriate Request Form, at the time of the New Hire Physical process. Applications not submitted by such date will not be accepted for review.
   - For those Employed CI requesting a medical exemption after a first dose of any COVID-19 Vaccine shall complete and submit the appropriate Request Form no later than October 1, 2021.
   - Covered Individuals, other than Employed CI, must complete an attestation statement
and submit proof of an approved exemption by the time frames outlined above.

A. MEDICAL EXEMPTIONS for Employed CI: Employed CI may be eligible for a Medical Exemption if they meet any of the following conditions and request an exemption:

- Any person who has a severe allergy to an identified component of the COVID-19 vaccine; or other medical conditions supported by a treating physician on a case-by-case basis.
- The Employed CI must complete and submit the appropriate Request Form, no later than the due date stated in Section 7 above.
- Following the effective date of this policy, any newly hired Employed CI shall submit a Request for Medical Exemption Form as part of their New Hire physical process. Exemption requests not finalized prior to the new hires start date will require the new hire to follow masking guidelines until final review is rendered.
- The RWJBarnabas Health Medical Review Committee will review all completed requests. Employed CI will be notified of the outcome of their requests in approximately seven (7) business days following submission of completed request; subject to delays including based on the amount and frequency of submissions received. Decisions by the RWJBH Medical Review Committee will be final.
- Please be advised that information regarding the coronavirus, including variants, treatments, types of vaccines, and contraindications is being updated constantly. Therefore, we reserve the right to review and reconsider approved exemptions at any time based on the then current facts and circumstances.

B. RELIGIOUS/ SINCERELY HELD BELIEF EXEMPTIONS: Employed CI may be eligible for a Religious/Sincerely Held Belief exemption and shall complete and submit the appropriate Request Form, no later than the due date stated in Section 7 above.

- Following the effective date of this policy, any newly hired Employed CI shall submit a Request for Religious Exemption Form/Sincerely Held Belief Exemption as part of their new hire physical. Requests not finalized prior to the new hires start date will require the new hire to follow masking guidelines until final review is rendered.
- The RWJBH Religious/Sincerely Held Belief Exemption Review Committee will review all completed requests. All employees will be notified of the outcome of their requests in approximately seven (7) business days following submission of completed request; subject to delays including based on the amount and frequency of submissions received. Decisions by the RWJBH Religious/Sincerely Held Belief Exemption Review Committee will be final.
- Please be advised that information regarding the coronavirus, including variants,
treatments, types of vaccines, and contraindications is being updated constantly. Therefore, we reserve the right to review and reconsider approved exemptions at any time based on the then current facts and circumstances.

C. IDENTIFICATION FOR APPROVED COVID-19 EXEMPTIONS: RWJBH may require Covered Individuals who receive an approved medical exemption or religious/sincerely held belief exemption to be identified as an Exempted Individual.

9. NON-COMPLIANCE: Any Employed CI who (i) fails to obtain at least the first dose of the COVID-19 vaccine, or (ii) is not an Exempted Individual, or (iii) does not have a pending exemption, by the end of the business day on October 1, 2021 (for new hires the time frame set forth in section 4 above) shall be deemed not in compliance with this policy. In lieu of instituting an unpaid suspension effective October 1, 2021 for any Employed CI not in compliance, such Employed CI will continue to work (and be paid), follow the CDC guidelines for unvaccinated individuals working in the healthcare facility, for the two-week time frame ending October 15, 2021 (for new hires two consecutive weeks following their time to comply as set forth in section 4 above) within which such Employed CI may become compliant with policy. Any Employed CI who fails to comply will be terminated from employment at RWJBH effective October 15, 2021 (for new hires within two consecutive weeks following their time to comply as set forth in section 4 above). Any Covered Individual who is not an Employed CI who fails to be in Full Compliance will not be permitted to perform duties at any RWJBarnabas Health Facility.

10. MANAGEMENT RESPONSIBILITIES:
   A. Ensure that all Covered Individuals are aware of this policy, the mandatory vaccine requirement, the exemption process, and any applicable educational materials regarding the vaccine as appropriate.
   B. Review available reports for all Employed Covered Individuals for their participation.
   C. Maintain the confidentiality of any medical information or information concerning the vaccine status of Covered Individuals.
   D. Refrain from asking Covered Individuals follow-up questions regarding their vaccine status that may tend to reveal a disability. If a Covered Individual indicates that they qualify for an exemption, the employee should be referred to the exemption application process without being required to answer any further questions.
   E. Ensure all department employees are aware of any department specific requirements related to using protective equipment when performing certain job activities with the department or elsewhere within the facility to minimize risks to patient, self, and others.
   F. Ensure that all Covered Individuals approved for an exemption follow additional required restrictions, safety protocols, or safety requirement related to using protective
equipment when performing certain job activities with the department or elsewhere within the facility to minimize risks to patient, self, and others.

G. Ensure all policy and procedure steps are followed as outline in the policy including communicating and administering the “Non-Compliance” consequences in a timely and consistent manner.

REFERENCES: