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Resource: *LeAnn Gochenour:
 Operations Manager,
 EOHS*

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 System Wide*

COVID-19 Vaccine Requirement

PURPOSE/POLICY

To protect our patients, our employees, our community, prevent the infection and spread of COVID-19, and as an integral part of its public health and safety measures, Valley Health will now require that all Valley Health badged staff and contractors working at a Valley Health facility, for whom the COVID-19 vaccine is authorized under emergency use by the FDA, be fully vaccinated against COVID-19 no later than November 1, 2021 according to the schedule below, unless an exemption from this policy has been granted as an accommodation or otherwise. For the purpose of Valley Health vaccine requirement, “badged staff” includes all Valley Health employees, employed and affiliated physicians, advanced practice clinicians, independent providers on the Medical and Allied Health/Advanced Practice staff of a Valley Health hospital contractors, students, interns and volunteers. This is inclusive of full-time, part-time, temporary or PRN status, and regardless whether you work on-site at any Valley Health location or remotely.

PROCEDURE

Proof of Vaccination

Valley Health badged staff and contractors working at a Valley Health facility must provide written proof of vaccination according to the scheduled below.

New hire/re-hire candidates must provide written proof of vaccination to Employee Health (EH) prior to new hire/re-hire clearance. If not fully vaccinated, new hire/rehire candidates will be required to receive their first dose of the vaccination during their medical clearance process and agree to receiving the second dose if a two-dose vaccine as a condition of continued employment.

All volunteers, agency contractors, vendors, and students will provide written proof as detailed below.

Do not include any medical or genetic information with your proof of vaccination.

Vaccination Verification to be provided per the following:

- Employees → EH
 - Non-vaccinated Managers, Directors, Vice Presidents, employed physicians and advanced practice clinicians not requesting a medical or religious exemption to provide vaccination verification to EH for the first dose of the COVID-19 vaccine no later than August 16, 2021 and the second dose if

- applicable no later than November 1, 2021.
- Non-vaccinated Manager, Director, Vice Presidents, employed physicians and advanced practice clinicians who have been denied a medical or religious exemption request to provide vaccination verification to EH for the first dose of the COVID-19 vaccine no later than September 15, 2021 and the second dose if applicable no later than November 1, 2021.
 - Non-vaccinated employees designated as Supervisors and front-line without an approved medical or religious exemption to provide vaccination verification to EH for the first does of the COVID-19 vaccine no later than October 1, 2021 and the second dose if applicable no later than November 1, 2021.
 - Vaccinated employees to provide full vaccination verification to EH no later than October 1, 2021.
- Independent Medical Staff → Medical Staff Affairs
 - All non-vaccinated independent medical staff not requesting a medical or religious exemption to provide vaccination verification to Medical Staff Affairs department for the first dose of the COVID-19 vaccine no later than August 16, 2021 and the second dose if applicable no later than November 1, 2021.
 - All non-vaccinated independent medical staff who have been denied a medical or religious exemption request to provide vaccination verification to Medical Staff Affairs department for the first dose of the COVID-19 vaccine no later than September 15, 2021 and the second dose if applicable no later than November 1, 2021.
 - Independent medical staff include physicians and allied health practitioners.
 - All vaccinated independent medical staff to provide vaccination verification to Medical Staff Affairs department no later than September 15, 2021.
 - Independent medical staff members who only provide services remotely, such as teleradiologists, are exempt from the vaccination requirement.
 - Volunteers → Volunteer Office
 - All badged volunteers to provide vaccination verification to their facility Volunteer Office no later than October 1, 2021.
 - Students and Adjunct Clinical Faculty → Academic Liaison
 - Effective August 1, 2021, it is the policy of VH that all students and adjunct clinical faculty who come on VH premises must be vaccinated for COVID-19 in accordance with the requirements and deadlines of this policy.
 - Students and adjunct clinical faculty with remote assignments are not required to be vaccinated. In the event some students or adjunct clinical faculty come to VH for a site visit, all individuals must be vaccinated or attend the visit virtually.
 - Students and adjunct clinical faculty already performing work, training, or studies on VH premises prior to August 1, 2021 must be fully vaccinated with both doses of an approved 2 dose vaccine or 1 dose of a 1-dose vaccine (e.g. J&J) by November 1, 2021.
 - New students and adjunct clinical faculty starting on or after August 1, 2021 must be be fully vaccinated at least two weeks prior to starting.

All educational institutions for students and learners must ensure these individuals are vaccinated according to the criteria above.

 - a. All educational institutions for students and learners must obtain proof of vaccination status and agree to provide it to VH upon request.
 - b. VH will not collect proof of vaccination from students or learners.
 - c. VH will create an audit process to monitor agency compliance. Non-cooperation with the audit process may result in immediate termination of the learning opportunity for the individuals assigned to VH.

- For students and adjunct clinical faculty who refuse vaccination:
 - a. If the learning assignment expires/ends on or before August 1, 2021, the learning assignment should not be renewed.
 - b. If the learning assignment expires/ends after August 1, 2021, VH will provide notice of intent to terminate the learning assignment in accordance with the learning agreement on or before August 1, 2021.
 - c. Exemption requests will not be granted to students or adjunct clinical faculty.
- Agency/Contract, Other Non VHS Staff → Hiring Manager
 - Effective August 1, 2021, it is the policy of VH that all agency contractors and vendors who come on VH premises must be vaccinated for COVID-19 in accordance with the requirements and deadlines of this policy.

Contractors with remote assignments are not required to be vaccinated. In the event some contractors come to VH for a site visit, all individuals must be vaccinated or attend the visit virtually. Agency contractors already performing work on VH premises prior to August 1, 2021 must be fully vaccinated with both doses of an approved 2 dose vaccine or 1 dose of a 1-dose vaccine (e.g. J&J) by November 1, 2021.

New contractors starting on or after August 1, 2021 must be fully vaccinated at least two weeks prior to starting.

All contract agencies must ensure these individuals are vaccinated according to the criteria above.

All contract agencies must obtain proof of vaccination status and agree to provide it to VH upon request.
 - b. VH will not collect proof of vaccination from contractors.
 - c. VH will create an audit process to monitor agency compliance. Non-cooperation with the audit process may result in immediate termination of the contract for the individuals assigned to VH. For contractors who refuse vaccination:
 - a. If the contract expires/ends on or before August 1, 2021, the contract/assignment should not be renewed.
 - b. If the contract expires/ends after August 1, 2021, VH will provide notice of intent to terminate the assignment in accordance with the contract agreement on or before August 1, 2021.
 - c. An exception may be considered with respect to contractors if termination of the contract will result in financial or other penalty.

Accommodation and Exemption Requests

Disability Accommodation for Employees, Medical Staff and Volunteers

Valley Health provides reasonable accommodations, absent undue hardship, to qualified individuals with disabilities that enable them to perform their job duties. Reasonable accommodation may include appropriate adjustment or modifications of employer policies, including this COVID-19 Vaccination Requirement Policy.

If you believe you need an accommodation regarding this policy because of a disability, you are responsible for requesting a reasonable accommodation by completing a [Request for Medical Exemption or Deferral COVID-19 Vaccination Form](#) and submitting to medicalreviewboard@valleyhealthlink.com. This request must be completed in its entirety and include any required documentation by August 16, 2021. New hire/re-hire (including transfers) candidates must complete the request and include any required documentation prior to new hire/re-hire clearance.

Interactive Process

Valley Health will engage in an interactive process with you to determine the precise limitations of your ability to comply with this vaccination policy and explore potential reasonable accommodations that could overcome those limitations. However, Valley Health is not required to make any specific accommodation requested and may provide an alternative effective accommodation, to the extent any reasonable accommodation can be made without imposing an undue hardship on Valley Health or posing a direct threat to patients, employees, or others in the workplace.

Religious Exemption for Employees, Medical Staff and Volunteers

Valley Health also provides reasonable accommodations, absent undue hardship, to staff with sincerely held religious beliefs, observances, or practices that conflict with getting vaccinated.

If you believe you need an exemption regarding this policy because of your sincerely held religious belief, you are also responsible for requesting a reasonable exemption by completing a [Request for Religious Exemption COVID-19 Vaccination Form](#) and submitting to religiousreviewboard@valleyhealthlink.com. This request must be completed in its entirety and include any required documentation by August 16, 2021. New hire/re-hire candidates (including transfers) must complete the request and include any required documentation or prior to new hire/re-hire clearance.

Exemption/Deferral for Other Medical Reasons for Employees, Medical Staff and Volunteers

Exemptions for other medical reasons may be available on a case-by-case basis/for certain conditions that are a contraindication to the COVID-19 vaccine even if they do not qualify as a disability under federal, state, or local law. Valley Health has set up a process, including a Panel of Physicians, to engage in an interactive dialogue with you to determine whether an exemption is appropriate. Individuals for whom currently available COVID-19 vaccines have not been approved and who therefore are ineligible to receive a COVID-19 vaccine are not covered by this policy and will be granted an exemption from this policy until they become eligible or until an approved vaccine becomes available for their use. Valley Health reserves the right to take any necessary and appropriate steps, including imposing alternative COVID-19 prevention measures, to ensure that the individual does not pose a direct threat to the health or safety of others in the workplace.

Religious and Medical Exemption Requests by Contracted Staff and Vendors

- VH is not the employer of contracted staff, other contractors and vendors. Consequently, VH is not the appropriate party to evaluate requests for religious or medical exemptions by contracted staff and vendors.
- Contracted staff and vendors must request exemption requests from their employers.
- If the employer/institution grants an exemption, it will be handled as set forth below in policy section "Handling religious exemptions for contracted staff and vendors."
- VH may supplement its guidelines for handling religious and medical exemptions by contracted staff and vendors.

How to Request a Medical Accommodation or Medical Exemption/Deferral for Employees, Medical Staff and Volunteers

You may request a reasonable accommodation or other exemption from this policy by completing a [Request for Medical Exemption or Deferral Form](#) and submitting to medicalreviewboard@valleyhealthlink.com for Medical exemptions. The Request Form must be completed in its entirety and you must include any required documentation by August 16, 2021. New hires must complete the request and include any required documentation prior to new hire/re-hire clearance (including transfers).

The forms are hyperlinked within this policy and available on VHS' Intranet under Employee Health-->

Corporate Forms--> Covid Resources--> *Request for Medical Exemption or Deferral COVID-19 Vaccination Form*

Exemption/Deferral Forms to be provided per the following:

The Request for Medical Exemption COVID-19 Vaccination form must be fully completed in in order for an exemption request to be reviewed and considered. Failure to provide the information or documentation requested or within the timeframe requested may result in denial of your request. Requests for medical exemption and any documents provided will be kept confidential. If you are granted an exemption, you may be required to submit to additional COVID-19 testing and other mitigation measures such as additional PPE usage, social distancing, modified schedules, modified work location, reassignment, a temporary leave of absence, or any other reasonable accommodation which Valley Health determines would reduce the risk of transmission of the COVID-19 virus to you, our patients, our workforce and our community. Valley Health may choose among reasonable accommodations as long as the chosen accommodation is effective.

- When you have completed the Request for Medical Exemption COVID-19 Vaccination form, please email them plus any other documentation to medicalreviewboard@valleyhealthlink.com.
- Please put your Employee ID in the Subject Line of your email to assure accurate review and processing. If you are in a position of Manager, Director or Credentialed Provider (e.g., MD, DO, NP, PA) you must also include "Manager," "Director," or "MD," "DO," "NP," "PA" before your Employee ID. For example, Director 12345, Manager 45678, or MD 23456. Any other variation such as DIR or MGR, will not be accepted.

How to Request a Religious Accommodation for Employees, Medical Staff and Volunteers

You may request a reasonable accommodation or other exemption from this policy by completing a [Request for Religious Exemption COVID-19 Vaccination form](#) and submitting to religiousreviewboard@valleyhealthlink.com. The Request Form must be completed in its entirety and you must include any required documentation, including an optional *Religious Exemption COVID-19 Vaccination Request for Verification* form by August 16, 2021. New hires must complete the request form and include any required documentation prior to new hire/re-hire clearance (including transfers).

The forms are hyperlinked within this policy and available on VHS' Intranet under Employee Health--> Corporate Forms-->Covid Resources-->*Request for Religious Exemption COVID-19 Vaccination*

Exemption Forms to be provided per the following:

The *Request for Religious Exemption COVID-19 Vaccination* form and the *optional Religious Exemption COVID-19 Vaccination Request for Verification* form must be fully completed in in order for an exemption request to be reviewed and considered. Failure to provide the information or documentation requested or within the timeframe requested may result in denial of your request. Requests for medical exemption and any documents provided will be kept confidential. If you are granted an exemption, you may be required to submit to additional COVID-19 testing and other mitigation measures such as additional PPE usage, social distancing, modified schedules, modified work location, reassignment, a temporary leave of absence, or any other reasonable accommodation which Valley Health determines would reduce the risk of transmission of the COVID-19 virus to you, our patients, our workforce and our community. Valley Health may choose among reasonable accommodations as long as the chosen accommodation is effective.

- When you have completed the Request for Religious Exemption COVID-19 Vaccination form, please email them plus any other documentation to religiousreviewboard@valleyhealthlink.com
- Please put your Employee ID in the Subject Line of your email to assure accurate review and processing.

If you are in a position of Manager, Director, or Credentialed Provider, you must also include “Manager,” “Director,” “MD,” “DO,” “NP,” or “PA” before your Employee ID. For example, Director 12345, Manager 45678, or MD 23456. Any other variation such as DIR or MGR, will not be accepted.

Handling Religious and Medical Exemption Requests by Contracted Staff and Vendors

- Handling exemption requests by contracted staff, other contractors and vendors:
 - Requests for a religious or medical exemption must be directed to their employer.
 - The employer must have an established process for granting exemptions.
 - If the employer grants an exemption, it must provide documentation of the basis for the exemption.
 - Upon receipt of the exemption, VH Human Resources will determine whether the exemption may be accommodated. HR will partner with leadership over the departments where the individual works to make this determination.

Valley Health reserves the right to request additional documentation supporting the need for an accommodation or request for any other exemption. Valley Health will keep confidential any medical information obtained in connection with your request for a reasonable accommodation or other exemption. We ask that you not provide any genetic information to Valley Health when responding to a request for additional information or providing proof of vaccination in compliance with this policy.

Determinations

Valley Health will make a determination regarding requested accommodations and exemptions/deferral on an individualized basis considering the basis of the request, the documentation received and other factors such as work location. Valley Health strives to make these determinations expeditiously and in a fair and nondiscriminatory manner and will inform you after we make a determination. Decisions will be communicated to employees between August 17, 2021 and September 15, 2021.

If your request is denied, COVID-19 vaccines are available free of charge through EH. Employees also have the option of vaccination elsewhere from a third-party provider of their choice such as local pharmacies, Wal-Mart, and community based clinics.

Approved Accommodation and Exemption/Deferral

Staff with approved accommodation and exemption/deferral will be required to wear a mask and eye protection, when removed for eating and drinking, staff must practice social distancing.

Policy Modification

Government and public health guidelines and restrictions and business and industry best practices regarding COVID-19 and COVID-19 vaccines are changing rapidly as new information becomes available, further research is conducted, and additional vaccines are approved and distributed. Valley Health reserves the right to modify this policy at any time in its sole discretion to adapt to changing circumstances and business needs, consistent with its commitment to maintaining a safe and healthy workplace.

Enforcement and Non-Retaliation

Failure to comply with or enforce this policy may result in discipline, up to and including termination of employment.

If proof of vaccination or scheduled vaccination dates or required forms or documentation for exemptions are not provided by stated deadlines, an employee will be assumed to have not completed the vaccine requirement on time.

Employees will be placed on an unpaid administrative leave for fourteen (14) calendar days to meet the requirements outlined in this policy. During this administrative leave, employees are not permitted to use PTO or any other paid time away program. If an employee does not provide the necessary documentation, of vaccination within fourteen (14) calendar days their employment will end.

An employee who resigns on or before the stated deadline and who leaves Valley Health in good standing will be eligible for pay out of unused paid time off according to policy HR800, Resignation. Any employee who leaves VHS employment because of the required vaccines were not obtained within the stated timeframes will be eligible for rehire provided the pre-employment requirements are met.

Valley Health prohibits any form of discipline, reprisal, intimidation, or retaliation for reporting a violation of this policy or any other health and safety concern or for requesting an exemption as an accommodation for a medical condition or sincerely held religious belief.

ⁱ The Genetic Information Nondiscrimination Act of 2008 (GINA) prohibits employers and other entities covered by GINA Title II from requesting or requiring genetic information of an individual or family member of the individual, except as specifically allowed by this law. To comply with this law, Valley Health asks that you not provide any genetic information when responding to this request for medical information.

"Genetic information," as defined by GINA, includes:

- An individual's family medical history.
- The results of an individual's or family member's genetic tests.
- The fact that an individual or an individual's family member sought or received genetic services.
- Genetic information of a fetus carried by an individual or an individual's family member or an embryo lawfully held by an individual or family member receiving assistive reproductive services.

All revision dates:

07/2021, 07/2021, 07/2021

Attachments

[Medical Exemption or Deferral COVID-19 Vaccination - Instruction Sheet.docx](#)

[Religious Exemption from COVID-19 Vaccination - Instruction Sheet.docx](#)

[Religious Exemption COVID19 Vaccination Request for Verification Form Final 7_14_2021.docx](#)

[Request for Religious Exemption COVID-19 Vaccination Form Final 7_14_2021.docx](#)

[Request for Medical Exemption COVID-19 Vaccination Form Final 7_14_2021.docx](#)

Approval Signatures

Step Description	Approver	Date
	Elizabeth Savage: CHIEF HUMAN RESOURCES OFFICER	07/2021
	Tonia Suber: VHS VICE PRESIDENT HR BUSINESS PARTNERSHIPS [CM]	07/2021
	Mary Roxer: Vice President Total Rewards and HR Operations	07/2021
	LeAnn Gochenour: Operations Manager, EOHS	07/2021

Applicability

Hampshire Memorial Hospital, Northern West Virginia Home Health, Page Memorial Hospital, Shenandoah Memorial Hospital, Valley Health Surgery Center, Valley Health System, Valley Physician Enterprise, Valley Regional Enterprises, War Memorial Hospital, Warren Memorial Hospital, Winchester Medical Center

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