

OSS HEALTH
COVID-19 VACCINATION
POLICY AND PROCEDURE

PURPOSE: In accordance with the Centers for Medicare and Medicaid Services (“CMS”) conditions of participation for Medicare-certified providers and suppliers, particularly the CMS Omnibus COVID-19 Health Care Staff Vaccination Interim Final Rule, effective November 5, 2021 (the “CMS Rule”), OSS Health (“OSS”) is adopting this policy and procedure.

POLICY: As of January 4, 2022, all OSS employees are required to be fully vaccinated (as defined below) against COVID-19, unless an exemption has been approved. The process for requesting an exemption is described in more detail below. Compliance with this policy and procedure is a condition of continued employment with OSS. Please read this policy and procedure carefully and direct any questions to Human Resources. **This policy and procedure will be effective immediately.**

DEFINITIONS:

- **COVID-19** – A highly contagious respiratory disease caused by the SARS-CoV-2 virus. SARS-CoV-2 is thought to spread from person to person via airborne transmission when an infected person coughs, sneezes, or talks within close proximity to another person.
- **COVID-19 Vaccine** – There are currently two vaccines approved under the Emergency Use Authorization by the FDA for prevention of COVID-19 – Moderna and the Johnson & Johnson/Janssen vaccine. The Pfizer-BioNTech vaccine (interchangeable with the licensed Comirnaty vaccine) has received full approval by the FDA for the prevention of COVID-19. Completing the course of the Pfizer-BioNTech, Moderna, or Johnson & Johnson/Janssen vaccine is required in order for employees to be considered fully vaccinated in compliance with this policy.
- **Fully Vaccinated** – An employee is considered “fully vaccinated” two weeks after receiving the second dose of the Pfizer-BioNTech or Moderna vaccines, or two weeks after receiving the single dose of the Johnson & Johnson/Janssen vaccine. For the purposes of this policy, employees will be considered fully vaccinated if they have received the second dose prior to January 4, 2022.

PROCEDURE:

1. General Requirements and Implementation of the Policy:

- a. By **December 6, 2021**, all employees must provide proof of vaccination (meaning proof of receiving at least the first dose of a two-dose vaccine or proof of receiving one dose of the Johnson & Johnson/Janssen vaccine) to Employee Health, unless an exemption has been approved. See Section 2 below for information regarding requesting exemption from the vaccination requirement. Acceptable proof of vaccination may be any of the following:
 - i. a copy of the Center for Disease Control and Prevention (“CDC”) COVID-19 Vaccination Record Card;
 - ii. a copy of medical records documenting receipt of the vaccine; or

- iii. a copy of immunization records from a public health or state immunization information system.
- b. By **January 4, 2022**, all employees are required to be fully vaccinated, unless an exemption has been approved.
 - i. Employees hired on or after January 4, 2022, must be fully vaccinated prior to their start date or have an exemption approved by OSS Human Resources.
 - ii. Employees returning from a leave of absence after January 4, 2022, must be fully vaccinated by the first day of return to work or have an approved exemption from OSS Human Resources.
- c. OSS will maintain the confidentiality of employee records documenting vaccination status and requested exemptions.
- d. Employees should work with their managers to schedule time off to comply with this policy, if necessary.
- f. Any employee failing to show proof of full vaccination status by January 4, 2022, will be subject to suspension without pay or benefits, unless an accommodation/ exemption request has been granted.

2. Requesting an Exemption from the COVID-19 Vaccination:

- a. Accommodations related to the COVID-19 vaccine may be granted for certain physical or mental conditions, or sincerely held religious belief, practice or observance. **Requests for an accommodation should be received no later than December 6, 2021, for current employees and prior to the official start date for all new employees.** Criteria for medical exemptions may be established based on recommendations from the Centers for Disease Control and Prevention (“CDC”) and other applicable government or public health agencies. Copies of the exemption request forms can be obtained from Human Resources or online in the Ultipro (UKG) employee portal.
- b. Medical Exemption Request – If an employee believes they may have a disability or chronic condition that prohibits him or her from temporarily or permanently receiving the COVID-19 vaccine, he or she should request a medical exemption. Any employee requesting exemption from receiving the COVID-19 vaccine for a medical condition will be required to provide proof of the applicable medical restrictions from their treating healthcare provider. The employee must have their healthcare provider complete, sign and date the “Request for Medical Accommodation Relating to COVID-19 Vaccine Requirement” form and submit the completed form to Human Resources. If the exemption is requested for a temporary medical condition, the employee may be asked to periodically provide a medical certification confirming whether the exemption is still required.
- c. Religious Exemption Request – Any employee requesting exemption from the COVID-19 vaccine for a sincerely held religious belief, practice or observance must complete

the “Request for Religious Accommodation Relating to COVID-19 Vaccination Requirement” form and submit the completed form, in confidence, to Human Resources. Each request will be evaluated by Human Resources.

- d. For employees hired after January 4, 2022, any exemption request must be provided prior to the employee’s official start date.
- e. Human Resources will review all exemption requests and notify employees of the approval, denial, or request for clarification. If an exemption is denied, the employee will be notified of the denial in writing by Human Resources and required to receive the COVID-19 vaccine in compliance with this policy.
- f. Consideration will be made on a case-by-case basis to determine if an employee seeking an exemption can safely perform the essential functions of his or her job and without posing a direct threat to the health and safety of others.
- g. If an exemption request is granted, Human Resources will discuss reasonable accommodations with the employee. Reasonable accommodations include masking, social distancing, and temporary reassignment as determined by OSS. Upon approval of an exemption request, Human Resources will contact the employee to provide details on the specific accommodation(s) that will be made available.

Safety Protocols

In accordance with the CMS Rule, OSS follows current CDC guidance as it relates to COVID-19 safety protocols for the workplace, including masking and physical distancing requirements

Reservation of Rights

OSS reserves the right to modify this policy and procedure at any time in its sole discretion to adapt to changing legal directives, guidance, and business needs, consistent with OSS’s commitment to maintaining regulatory compliance.

Human Resources Points of Contact

For all questions relating to the implementation of this policy or any of OSS’s COVID-19 safety protocols, please contact the Director of Human Resources or Employee Relations Manager.

Attachments:

Request for Medical Accommodation Relating to COVID-19 Vaccination Requirement Form
Request for Religious Accommodation Relating to COVID-19 Vaccination Requirement Form

REQUEST FOR MEDICAL ACCOMMODATION RELATING TO COVID-19 VACCINE REQUIREMENT

In accordance with the CMS Omnibus COVID-19 Health Care Staff Vaccination Interim Final Rule, OSS Health (“OSS”) requires all employees to show or provide proof that they are fully vaccinated against COVID-19. Requests for accommodations relating to the vaccination requirement will be considered for certain recognized medical conditions if a reasonable accommodation is available to enable the employee to safely perform the essential functions of the job. All employees must have this form completed, signed and dated by their healthcare provider to request a medical exemption. If you have any questions, please contact Human Resources.

Name of Patient: _____

Date: ___/___/___

My patient is requesting a medical accommodation related to the COVID-19 vaccination requirement for the following medical reason(s):

Please answer the following:

- The condition noted above is a temporary medical condition. If temporary, what is the approximate duration: _____
- The condition noted above is a permanent medical condition

I certify that my patient has the above medical condition and requests medical accommodation related to the COVID-19 vaccination requirement. I understand that I may be contacted for additional clarification.

Signature of Healthcare Provider:

Name of Healthcare Provider and License Number (Print):

Name of Practice, Address and Phone:

*Please return completed form to Human Resources, by no later than **December 6, 2021.***

For Human Resources Use Only	
Dated Reviewed: ___/___/___	
_____	Approved for Exemption/Accommodation
_____	Not Approved for Exemption/Accommodation
By: _____	Signature: _____

**REQUEST FOR RELIGIOUS ACCOMMODATION RELATING TO COVID-19 VACCINATION
REQUIREMENT**

In accordance with the CMS Omnibus COVID-19 Health Care Staff Vaccination Interim Final Rule, OSS Health (“OSS”) requires all employees to show or provide proof that they are fully vaccinated against COVID-19. Requests for accommodations relating to the COVID-19 vaccination requirement will be considered if necessary to accommodate a sincerely held religious belief, practice or observance provided that a reasonable accommodation is available to enable the employee to safely perform the essential functions of the job and the accommodation does not impose an undue hardship on OSS. Please complete the form below to request a religious accommodation. If you have any questions, please contact Human Resources.

Name of Individual Requesting Religious Accommodation (please print clearly):

Date: ___/___/___

I understand that OSS will consider accommodations for the COVID-19 vaccination requirement for religious reasons. I am requesting an accommodation relating to the COVID-19 vaccination requirement for religious reasons.

Description of religious belief or firmly and sincerely held moral or ethical belief for exception to the COVID-19 vaccination requirement. (note – do not include political, medical, or scientific statements):

Signature of Requesting Employee:

Please attach any additional materials that support your request for a religious accommodation.

*Please return completed form to Human Resources, by no later than **December 6, 2021.***

For Human Resources Use Only	
Dated Reviewed: ___/___/___	
<input type="checkbox"/> Approved for Exemption/Accommodation	
<input type="checkbox"/> Not Approved for Exemption/Accommodation	
By: _____	Signature: _____