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Owner: *Ailee Strausser: Vice President, Human Resources*
Policy Area: *Human Resources*
References:

Universal COVID-19 Vaccination Policy

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Purpose

To provide and maintain a workplace free of recognized hazards, and to minimize the risk of acquiring, transmitting, or experiencing complications from COVID-19 (SARS-CoV-2) and to comply with guidance from the Center for Disease Control and Prevention ("CDC") and public health and licensing authorities, Abramson Senior Care (ASC) has adopted a Universal Vaccination Policy for COVID-19.

Policy

Employees must be vaccinated against COVID-19 as a condition of employment, with the exception of approved documented medical or religious exemptions. The Universal COVID-19 Vaccination Policy is intended to safeguard the health and well-being of patients, residents, participants, their families, employees, affiliates, and visitors from the infectious conditions of COVID-19 that can be reduced through an effective universal vaccination program. Employees who are not vaccinated and who do not qualify for a vaccination exemption in accordance with this policy will be terminated.

Procedure

A. Deadlines

1. The initial deadline to be fully vaccinated for COVID-19 for employees whose role may require them to provide care for patients located in Philadelphia is October 15, 2021. For all other Employees, the deadline to be fully vaccinated for COVID-19 is November 1, 2021. On or before these dates, Employees must have received both doses of a 2-dose series vaccine such as Pfizer or Moderna, or the one single-dose vaccine, such as Johnson & Johnson **and be at least two weeks past the date of your second dose in the 2-dose series or at least two weeks past the date of your dose in the single-dose vaccine.**
2. The Universal COVID-19 Vaccination period is continuous, meaning should new information, requirements or recommendations arise from the CDC or other public health and licensing authorities regarding vaccine boosters or other vaccine protocol, Employees will be required to comply. ASC will communicate to Employees relevant dates for boosters and re-vaccinations.
3. Individuals receiving offers of employment are required to timely comply with the universal vaccination policy by providing proof of at least one COVID-19 vaccination shot prior to the commencement of

employment. Individuals receiving offers of employment from ASC who do not timely comply with this policy will have their offer of employment rescinded.

B. Receiving the Vaccination

1. Staff and newly hired employees can receive the COVID-19 vaccine at any community vaccination location.
2. All employees who receive the vaccination, whether through an ASC-sponsored vaccine clinic or at a non-ASC operated location, will be required to provide proof of such in accordance with the following:
 - Employees who are vaccinated will be required to provide proof of vaccination to the Human Resources Department. A copy of the proof of vaccination will be retained by ASC in the confidential employee health file.
 - Employees can go to www.vaccines.gov to find locations providing free COVID-19 vaccinations.
 - Employees who have lost their original vaccination card can obtain replacement proof of vaccination by visiting <https://www.health.pa.gov/topics/Reporting-Registries/PA-SIIS/Pages/PA-SIIS.aspx>. Note that these requests may take up to 10 days for the PA Department of Health to fulfill your request. If you are unable to access the website and need a replacement proof of vaccination, please contact the Human Resources department to obtain a paper request form; be aware that paper forms will require additional processing time.
 - New hires will have to provide proof of vaccination at their onboarding session. New hires must have received at least the first dose in a 2-dose series vaccine such as Pfizer or Moderna, or the one single-dose vaccine, such as Johnson & Johnson on or before their hire date, and they must present proof. New Hires must show proof when the second dose is completed. Failure to do so will result in termination of employment.

C. Exemption/Reasonable Accommodation

1. Employees can request an exemption from receiving the COVID-19 vaccine based upon the existence of either: (1) an underlying medical condition or disability that contraindicates administration of the vaccine ("Medical"), or (2) a sincerely held religious belief, practice, or observance ("Religious") by submitting the corresponding Exemption Form to the Human Resources Department along with supporting documentation.
2. Employees must submit all requests for exemption with supporting documentation by October 1, 2021, to receive a determination by the vaccination deadline.
3. Exemption accommodations will only be granted where they are reasonable and do not create an undue hardship on ASC and/or pose a direct threat to the health or safety of patients, residents, employees, and others in the workplace and/or to the employee requesting the exemption.

Medical exemptions

- Individuals requesting medical exemption due to medical contraindications must provide proof of medical contraindications from their private physician by submitting a completed request for medical exemption form. The medical exemption form can be obtained from the Human Resources department.
- Individuals requesting vaccine deferral due to pregnancy or breastfeeding must provide proof of temporary medical contraindications from their private physician by submitting a completed request for medical exemption form.
- Standard criteria for medical exemptions will be established based upon CDC recommendations.

Religious exemptions

- Individuals requesting a religious exemption must submit a request for religious exemption form. The religious exemption form can be obtained from the Human Resources department. Request must be consistent with prior vaccination history documentation.
- Each request for religious exemption will be reviewed by the Human Resources department.

Exemption granted

- If exemption is granted, the employee will be notified in writing.
- If exemption is granted for a temporary medical condition, the individual must resubmit a request for exemption annually if annual COVID-19 boosters are recommended by the CDC. If exemption is granted permanently, the employee does not need to submit a request annually, unless the vaccine components change eliminating issue related to allergies of components of vaccine.
- Any employee exempted from COVID-19 vaccine will be required to receive a PCR test or an antigen test twice per week or as otherwise indicated by the CDC or public health and licensing authorities. Additionally, exempted employees must wear a mask at all times while providing patient care and/or while onsite at any ASC location unless otherwise indicated by the CDC or public health and licensing authorities.

Exemption denied

- If an exemption request is denied the employee will be notified in writing and will be required to be immunized per this Policy.

Failure to comply with the Universal COVID-19 Vaccination Policy

- Failure to be immunized or granted an exemption by the date determined by the organization will result in immediate and automatic suspension.
- Suspended employees will be given two weeks to comply with immunization requirement or will face termination.
- Privileges may be suspended for medical staff who do not comply.

D. Non-Employees

1. All contract staff and vendors who provide care to ASC patients or conduct work onsite at an ASC-affiliated location must comply with the vaccination requirements, including proof of vaccination status, as stated within this Policy.
2. Contract staff and/or vendors who provide care to ASC patients located in Philadelphia must comply with this Policy by October 15, 2021. All other contract staff and/or vendors must comply with the Universal COVID-19 Vaccination requirement by November 1, 2021.
3. Contract staff and/or vendors who are not in compliance with this Policy will not be permitted to provide care to ASC patients or conduct work onsite at an ASC-affiliated location.

E. Confidentiality

1. All vaccination and other related records and correspondence will be maintained in full confidentiality in accordance with the law.
2. If an employee may be required to provide care to patients in a facility or municipality that requires COVID-19 vaccination, the employee must complete the "Employee Consent to Release Vaccination Status" form in order for ASC to release vaccination status to the third party.

Attachments

[Employee Consent for Release - Vaccine Status.pdf](#)

Approval Signatures

Approver	Date
Ailee Strausser: Vice President, Human Resources	09/2021