

Title: Mandatory Vaccination Policy	
Joint Commission Chapter Section: 1.0 Administrative	Date ORIGINAL policy was created: August 24, 2021
This policy belongs to: Employee Health	
Committee/Council Approval(s): Clinical Leadership Council.	Date of COMMITTEE Approval(s): February 16, 2022

This Policy contains one or more PROCEDURES outlining the methods and applicability of this Policy.

This policy applies to the following Geisinger Entities:

CLINICAL ENTITIES (includes Geisinger entities providing health care services, i.e., hospitals, group practices, clinics)	
<input checked="" type="checkbox"/> Community Medical Center (CMC or GCMC)	<input checked="" type="checkbox"/> Geisinger Jersey Shore Hospital (GJSH)
<input checked="" type="checkbox"/> Endoscopy Center of Geisinger Lewistown Hospital; an entity of GLH	<input checked="" type="checkbox"/> Geisinger Lewistown Hospital (GLH)
<input checked="" type="checkbox"/> Family Health Associates of GLH (FHA)	<input checked="" type="checkbox"/> Geisinger Medical Center (GMC)
<input checked="" type="checkbox"/> Geisinger Bloomsburg Hospital (GBH)	<input checked="" type="checkbox"/> Geisinger Medical Center Muncy (GMCM)
<input checked="" type="checkbox"/> Geisinger Clinic (GC)	<input checked="" type="checkbox"/> Geisinger Pharmacy, LLC
<input checked="" type="checkbox"/> Geisinger Community Health Services (GCHS)	<input checked="" type="checkbox"/> Geisinger Wyoming Valley Medical Center (GWV)
<input checked="" type="checkbox"/> Geisinger Encompass Health, LLC	<input checked="" type="checkbox"/> GMC Outpatient Surgery - Woodbine; an entity of GMC
<input checked="" type="checkbox"/> Geisinger Endoscopy-Montoursville; an entity of G-HM	<input checked="" type="checkbox"/> GWV Outpatient Surgery – CenterPoint; an entity of Geisinger Wyoming Valley Medical Center
<input checked="" type="checkbox"/> Geisinger Gray's Woods Outpatient Surgery and Endoscopy Center; an entity of GC	<input checked="" type="checkbox"/> Lewistown Ambulatory Care Corporation (LACC)
<input checked="" type="checkbox"/> Geisinger-HM Joint Venture (G-HM) ¹	<input checked="" type="checkbox"/> Marworth
<input checked="" type="checkbox"/> Geisinger Healthplex State College Outpatient Surgery and Endoscopy Center, a department of Geisinger Lewistown Hospital	<input checked="" type="checkbox"/> West Shore Advanced Life Support Services, Inc. (WSALS or Geisinger EMS)

NON-CLINICAL ENTITIES (includes Geisinger business/corporate entities not providing health care services)	
<input checked="" type="checkbox"/> Geisinger Commonwealth School of Medicine (GCSOM)	<input checked="" type="checkbox"/> Geisinger System Services (GSS)
<input checked="" type="checkbox"/> Geisinger Health (GH or GHF)	<input type="checkbox"/> GNJ Physicians Group (GNJ)
<input checked="" type="checkbox"/> Geisinger Health Plan (GHP)	<input checked="" type="checkbox"/> ISS Solutions, Inc. (ISS)
<input type="checkbox"/> Geisinger Quality Options, Inc. (GQO)	<input type="checkbox"/> Keystone Health Information Exchange, Inc. (KeyHIE)

PURPOSE

This Mandatory Vaccine Policy requires those Persons Affected to receive vaccines in accordance with this Policy and the Centers for Disease Control and Prevention’s (CDC’s) most recent recommendations, therefore increasing vaccine rates, resulting in potential reductions in the incidence and severity of cases, absenteeism rates, and increasing cost savings, effectiveness, and safety of all Persons Affected and the patients whom they serve.

¹ Geisinger-HM Joint Venture is an LLC representing a joint venture between Geisinger Medical Center and Highmark Health.

PERSONS AFFECTED

All Geisinger employees, faculty, medical staff, residents, fellows, contingent workers, trainees, observers, volunteers, students, and Specified Vendors, regardless of employer.

MANDATORY VACCINES:

Seasonal Influenza Vaccination

COVID-19 Vaccination (either both doses of Pfizer/Moderna, one dose of the J&J vaccine, or as otherwise approved by the FDA)

Tetanus, Diphtheria, and Pertussis Vaccination (Adacel or Boostrix) – those who work in a building where patient care occurs

POLICY

As a condition of employment, appointment to the medical, residency, or allied staff, or access to facilities covered by this Mandatory Vaccine Policy, all Persons Affected must receive Geisinger mandatory vaccines or have a documented approved exemption. The Mandatory Vaccine Policy is to ensure that the applicable vaccines will be required for all Persons Affected in accordance with the CDC’s most recent recommendations. Vaccines will be offered free of charge for all Geisinger employees, faculty, medical staff, residents, fellows, trainees, volunteers, observers and students. Specified Vendors or contingent workers shall require the mandatory vaccines and bear the cost of vaccine administration for their workforce subject to this policy. Administration is subject to market availability.

DEFINITIONS

Vaccine Exemption Core Team – A multidisciplinary group that includes representatives from Infectious Diseases, Employee Health, Human Resources, Quality, Legal, and Spiritual Care or Bioethics, as needed.

Specified Vendors Required to comply with Seasonal Influenza Vaccination and Tetanus, Diphtheria, and Pertussis Vaccination – Vendors providing a service or good, individually or through a third-party company pursuant to a contract, purchase order, or similar arrangement and, through that relationship, enters patient care areas at a Geisinger facility or has direct contact with Geisinger patients.

Specified Vendors Required to comply with COVID-19 Vaccination – Vendors providing a service or good, individually or through a third-party company pursuant to a contract, purchase order, or similar arrangement and, through that relationship, enters patient care areas at a Geisinger facility or has direct contact with Geisinger patients or Geisinger staff who provide care, treatment, or other services for hospitals or patients.

Geisinger reserves the right to audit a Specified Vendor for compliance with this policy.

RESPONSIBILITIES

Employee Health departments oversee this process, with collaboration from the Vaccine Exemption Core Team, Human Resources, Legal, and executive leadership, to maintain compliance. Employee Health, employee managers and Quality are responsible for identifying staffing, scheduling and administering of the vaccinations. EQUIPMENT/SUPPLIES: Mandatory Vaccines Syringes, needles and other supplies for administration of vaccine. An emergency kit will be available at all immunization clinics/sites. Administration of emergency medications will follow standing orders.

EQUIPMENT/SUPPLIES

N/A

PROCEDURE

Mandatory Vaccines

A. Newly hired Persons Affected:

1. At the time of the post offer and pre-employment Health and Vaccine Review, documentation of the Mandatory Vaccinations administration in accordance with the CDC's most recent recommendations will be elicited.
2. All newly hired Persons Affected who do not have a documented approved exemption as provided in Section E will be required to receive the Mandatory Vaccinations in accordance with the CDC's most recent recommendations.

B. Procedure to identify Persons Affected who are currently employed or providing services

1. Employee Health, managers of employees, or Mandatory Vaccination team captains, along with the department designates, will identify existing Persons Affected and will confirm compliance with this policy or work with the individuals to schedule the administration of the Mandatory Vaccinations.
2. All Persons Affected who do not have an approved exemption as outlined in Section E will be required to receive the Mandatory Vaccinations in accordance with the CDC's most recent recommendations.

C. Immunization Process

1. Administration of Mandatory Vaccines
 - i. Managers will be responsible to track compliance through Manager Dashboard reporting
 - ii. Vaccine clinics will be scheduled at times and in locations convenient for Persons Affected. Available dates, times, and locations will be posted on the OurGeisinger website by Corporate Communications.
 - iii. Once vaccination occurs or proof of vaccination is provided from an outside source (which can be uploaded through a link on Employee Health website), a Geisinger-approved sticker may be applied to the front of the identification badge for some vaccinations.
 - iv. The most current CDC Vaccination Information Sheet will be provided to Persons Affected for review prior to administration of a vaccine.
 - v. Geisinger will follow the administration recommendations of the CDC.

Policy versions prior to May 15, 2019, may be requested by contacting Geisinger Quality & Safety.

Geisinger's policies, procedures, guidelines, and protocols are CONFIDENTIAL PROPRIETARY information, which are not to be disclosed outside the Geisinger system.

- vi. Any adverse reaction to a Mandatory Vaccination provided to Persons Affected by Employee Health must be immediately reported by such Persons Affected to Employee Health for documentation and follow-up.
- vii. To assist and prior to the distribution and administration, applicable staff will be trained on proper storage, administration, and documentation of the vaccines.

D. Mandatory Vaccine Campaign Planning, Reporting, and Proof of Vaccination

1. Campaign planning

- i. Establish annual goal - The goal is for 100% of Persons Affected to receive all Mandatory Vaccines or have approval for an exemption in accordance with this Policy.
- ii. Establishment of annual Corporate Communications Mandatory Vaccination Campaign Market Plan.
- iii. Establish dates by which Persons Affected must receive all Mandatory Vaccinations or obtain an exemption, as communicated on the OurGeisinger website.
- iv. Ongoing review with Employee Health and system leadership of the overall campaign effectiveness will identify opportunities for improvement.
- v. A notice which included the following will be displayed at all Employee Health vaccine administration areas: NOTICE: Please note that compliance with Mandatory Vaccinations is required, this serves as notice that information about your compliance status with the policy (i.e. information confirming that you received a flu vaccine) will be shared with Geisinger Leadership and Geisinger Human Resources.
- vi. All Specified Vendors shall maintain on their person, at all times when present at a Geisinger facility, proof of vaccination status. Whether such proof of vaccination is acceptable shall be within Geisinger's sole discretion.

E. Exemption Process

- 1. All requests for exemptions from Geisinger employees, faculty, medical staff, residents, fellows, trainees, volunteers, observers and students will be sent for review and approval to the Vaccine Exemption Core Team. Exemptions are reviewed as part of an interactive process and will be considered on a case-by-case basis.
 - i. Medical Exemptions – Persons Affected seeking a medical exemption are required to complete a “Request for Medical Exemption from Mandatory Vaccination(s)”, which is available on the Employee Health website.
 - ii. Religious Exemptions – Persons Affected seeking a religious exemption are required to complete a “Religious Exemption Request Form”, which is available on the Employee Health website.
- 2. Specified Vendors and contingent workers shall have a process that provides for their employees to seek an exemption from this policy consistent with the Americans with Disabilities Act, Title VII of the Civil Rights Act, and all applicable laws. For religious exemptions granted to Specified Vendors, proof that a religious exemption was granted should be described in a letter (or such other reasonably acceptable document necessary for Geisinger to meet the requirements of a regulatory agency) on the granting entities letterhead and kept of the individual at all times when on Geisinger property. For medical exemptions granted to Specified Vendors, proof that a medical exemption must be kept of the individual at all times when on Geisinger property, and must include the following:
 - i. A statement that the individual be exempt from receiving a specific vaccine;
 - ii. A recognized medical reason why the vaccine is contraindicated for the individual; and
 - iii. The statement is signed and dated by a licensed practitioner
 - iv. Other information necessary for Geisinger to meet the requirements of a regulatory agency
- 3. If a mandatory vaccine exemption is approved, an appropriate accommodation will be provided to the employee.

4. If an exemption is not approved, existing employees will be notified via email and they must comply with the policy.
5. Staff granted exemptions from a Mandatory Vaccine may be subjected to participate in accommodations to ensure the safety of patients, visitors, and other staff members that may include but are not limited to masking, testing, reporting of results, and symptom surveillance and screening.
6. All Employees granted an exemption (medical or religious) from the COVID vaccine will be required to mask continually while on Geisinger property as an accommodation to their exemption. This masking accommodation is expected to continue even if masking is dropped in non-clinical areas for those vaccinated employees (or eventually in clinical areas when community transmission rates dictate).

F. Non-Compliance

1. Persons Affected without documentation of the Mandatory Vaccinations or approved exemption will be considered noncompliant with this Policy.
2. Non-compliant individuals will have their Geisinger employment terminated, conditional offer revoked, or contractual relationship terminated.

ATTACHMENTS

N/A

REFERENCES

<https://www.cdc.gov/vaccines/adults/rec-vac/hcw.html>

[Revised Guidance for Staff Vaccination Requirements | CMS](#)