

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.

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.¹

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.

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.

¹ The term "staff" in this definition is from CMS Interim Final Rule, Omnibus COVID-19 Health Care Staff Vaccination, 86 FR 61555, 61568.

- 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.
- 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 and Reporting

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.

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.

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.

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.