

ANTHC OPERATIONAL POLICY
COVID-19 Employee Health Vaccination Policy

1. Purpose:

This operational policy is intended to maximize immunity and minimize transmission of COVID-19 on the ANMC accredited campus, and the wider community through vaccination of all ANTHC staff. The goal is to protect patients, staff, and the community from contracting and spreading the SARS-CoV-2 infection.

2. Scope:

All ANTHC staff to include health care workers, non-physician interns, residents, post-graduate trainees, students, volunteers and contractors. Individuals and business entities that have entered into contractual agreements with ANTHC are not exempt from vaccination requirements unless otherwise stated in their contracts. This policy does not include staff working in long-term telecommuting and/or remote work arrangements.

3. Background:

- 3.1. SARS-CoV-2 is the novel coronavirus causing COVID-19, a highly contagious respiratory illness. It can cause asymptomatic infection, mild to severe illness, and lead to death. The outbreak of this novel coronavirus began in November 2019 and spread throughout the world, resulting in a pandemic. In 1 year, COVID-19 has resulted in more than half a million deaths in the United States.
- 3.2. Containment of SARS-CoV-2 has been severely challenged by its transmission from asymptomatic infected individuals and being highly contagious via respiratory droplets.
- 3.3. Hospitalized patients and other patients with comorbidities and disabilities requiring assistance from healthcare workers are at particularly high risk of exposure and poor outcomes from COVID-19.
- 3.4. Effective and safe COVID-19 vaccines are authorized for use by the FDA and available to all ANTHC staff. Vaccinations provide immunity that reduces the chance of becoming sick from COVID-19 and decreases the infectivity of those who are asymptotically infected. Community herd immunity from vaccination is a tool we have to end the pandemic and scale back other infection control measures, such as universal masking and physical distancing.

4. Policy:

- 4.1. COVID-19 vaccines are mandatory for personnel included in Section 2, unless staff have an approved medical exception. See 4.5.
- 4.2. COVID-19 vaccines are available through ANTHC Employee Health at no cost.
- 4.3. ANTHC will communicate the following information:
 - 4.3.1. Requirement(s) for vaccination.

- 4.3.2. Procedure for receiving vaccination, and ensuring compliance with required COVID-19 vaccine doses, specified in 4.4.3., and vaccine schedules.
 - 4.3.3. Procedure for submitting written documentation of vaccine compliance obtained outside of ANMC.
 - 4.3.4. Procedure for submitting a request for medical exception. See 4.5.
 - 4.3.5. Consequences of refusing vaccination.
- 4.4. Staff must adhere to one of the following to meet COVID-19 vaccination compliance:
- 4.4.1. Receive the required doses (administration of a single-dose; or administration of all required doses of a multi-dose vaccine) of the COVID-19 vaccine to become fully vaccinated, prior to staff providing any care, treatment, or other services for the hospital and/or its patients.
 - 4.4.2. Staff are encouraged to obtain the recommended booster dose, and any recommended additional doses for individuals who are immunocompromised.
 - 4.4.3. Staff are considered fully vaccinated if it has been two weeks or more since they completed a primary vaccination series for COVID-19.
 - 4.4.4. Submit copies of COVID-19 vaccine record through employee health record system (ex. myHR) if employee vaccine was administered through services other than ANTHC Employee Health (e.g., private physician office, public clinics).
 - 4.4.5. Comply with the procedure in Section 4.5 below for requesting and obtaining an approved medical exception.
- 4.5. Medical Exception:
- 4.5.1. An exception for COVID-19 vaccine may be granted for certain medical contraindications.
 - 4.5.2. ANTHC, as a tribal organization, is not subject to the Civil Rights Act of 1964, and therefore does not accept religious exemptions/exceptions.
 - 4.5.3. Staff requesting a medical exception must submit the Medical Exception Form for COVID-19 Vaccination (Appendix A) to the ANTHC Employee Health department. If approved medical exception is granted, the signed copy of the exception form will be securely documented and tracked in the employee health record system.
 - 4.5.4. A request for medical exception, which takes into consideration recognized clinical contraindications to COVID-19 vaccines, will be evaluated on a case-by-case basis by a review committee, which includes the Chief Medical Officer, Medical Director of Infection Control, and ANMC Medical Staff President or their designees. The

committee will make a final determination within 14 days of receiving the request.

- 4.5.5. The review committee relies on the current recommendations from the CDC Advisory Committee on Immunization Practices (ACIP) for COVID-19 vaccinations when considering medical exemptions.
- 4.5.6. The review committee will consider temporarily delayed vaccination as a medical exception.
 - 4.5.6.1. “Temporarily delayed vaccination” refers to vaccination that must be temporarily postponed, as recommended by CDC, due to clinical precautions and considerations, including, but not limited to individuals with acute illness secondary to COVID-19, or individuals who received monoclonal antibodies or convalescent plasma for COVID-19 treatment in the last 90 days.
- 4.5.7. If a medical exception is granted for a temporary condition, staff must resubmit a request for medical exception upon termination of the temporary condition, if continued exception is desired. This temporary exception will be securely documented and tracked in the employee health record system.
 - 4.5.7.1. If resubmitted medical exception is denied, staff will immediately comply with COVID-19 vaccinations requirements. Human Resources will work with the employee, supervisor and EH team to ensure compliance.
- 4.5.8. If a medical exception is granted for a permanent condition, the medical exception does not need to be renewed unless vaccine guidance or technology (ex. if the components of the vaccine change and someone is no longer allergic to those new components, they could be eligible; or if new vaccines are developed) changes to eliminate the issue regarding the original medical contraindication(s).
- 4.5.9. Unvaccinated staff, with an approved medical exception, will adhere to additional precautions to decrease transmission and spread of COVID-19 including, but not limited to:
 - 4.5.9.1. Discuss telework/remote work options to complete job duties with supervisor.
 - 4.5.9.2. Work with Employee Health and supervisor for duties that limit exposure.
- 4.6. Compliance:
 - 4.6.1. Compliance information will be available in the employee health record system (ex. myHR). Supervisors are responsible for monitoring staff compliance. Individuals who are non-compliant will not be scheduled to work and may be subject to disciplinary action, up to and including termination.
 - 4.6.2. Any newly hired ANTHC employees must be fully compliant/vaccinated and/or have an approved medical exception prior to providing any care, treatment, or other services for the facility and/or its patients.

- 4.6.3. Staff who fail to comply with the COVID-19 vaccination requirement and do not obtain approval for a medical exception may be subject to disciplinary action, up to and including termination.
- 4.6.4. Contractors, those employees that follow HR badging process, will be tracked in Employee Health.
- 4.6.5. Contractors that provide infrequent services and tasks performed in or for ANMC, will follow internal processes in regards to respective contract obligations.
- 4.7. Monitoring:
 - 4.7.1. Employee Health will securely document and track COVID-19 vaccine doses, and medical exceptions, in the employee health record system and ensure that the State of Alaska vaccine mandatory reporting is completed. This will include the specific vaccine received and dates of each dose administered.
- 4.8. Vaccine Shortage Contingency:
 - 4.8.1. In the event of a COVID-19 vaccines shortage, vaccine will be offered to staff based on the risk to the patient population cared for, job function, and risk of exposure to COVID-19. Priority will be given to those who provide hands-on patient care with prolonged face-to-face contact with patients, and those having the highest risk of exposure to patients with COVID-19. Those who are not prioritized to receive vaccine will not be held to the mandatory standard for the duration of the vaccine shortage period, and other infection prevention recommendations will be provided to those who do not receive vaccine.
- 4.9. Prevention of Transmission of COVID-19:
 - 4.9.1. All staff regardless of vaccine status will continue to follow current ANMC/ANTHC COVID-19 policies and procedures.

Authority to Approve	CEO
Approval Date	July 15, 2021; Feb 2022
Effective Date	July 15, 2021; Oct 15, 2021, Feb 2022
Revision Date	February 2022
Responsible for Review	Employee Health Medical Director, Incident Commander; CET
Related Policies, Procedures, Etc.	ANMC COVID-19 Vaccine Management Plan PPE for COVID-19 Table ANTHC Masking Policy ANTHC Employee Health COVID-19 Procedure ANTHC COVID-19 Procedure

References and Historical Notes	<ol style="list-style-type: none"> 1. https://www.cms.gov/files/document/attachment-d-hospital.pdf 2. https://www.cdc.gov/coronavirus/2019-ncov/vaccines/ 3. https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-recommendations.html 4. https://www.cdc.gov/vaccines/acip/index.html 5. https://www.jointcommission.org/standards/standard-faqs/hospital-and-hospital-clinics/leadership-ld/000002376/ 6. Smith, Allen, J.D. "Steer Clear of Roadblocks to Mandating or Incentivizing Vaccines". 2/5/21 7. Practical Law Labor & Employment, Expert Q&A: COVID-19 Vaccine and Employment, 1/20/21 8. Smith, Allen, J.D. "Encourage or Require? Employers Take Different Tacks on COVID-19 Vaccinations". 2/1/21
---------------------------------	--

Appendix A: Medical Exception Form for COVID-19 Vaccination

Alaska Native Medical Center
 Medical Exception Form
 Request for Medical Exception From COVID-19 Vaccination Form

PLEASE PRINT THE FOLLOWING INFORMATION:

Name: _____ Date of Birth: ____/____/____
 Department: _____ Phone number: (____) ____-____
 Supervisor: _____

Have you been granted a medical exception for the COVID-19 vaccine through Employee Health? (Circle) Yes No
 If Yes, please list years: _____ (Note: No additional notes from Provider needed)
 If No, please have a medical provider complete the information below.

Dear Physician:

The Alaska Native Medical Center requires COVID-19 vaccination similar to other required vaccinations, such as MMR and Varicella. SARS-CoV-2 is the novel coronavirus that causes COVID-19 which is a highly contagious respiratory illness. It can cause asymptomatic infection, mild to severe illness, and lead to death. The outbreak of this novel coronavirus began in November 2019 and spread throughout the world, resulting in a pandemic. In 1 year, COVID-19 has resulted in more than half a million deaths in the U.S.

Containment of SARS-CoV-2 has been severely challenged by its transmission from asymptotically infected individuals and being highly contagious via respiratory droplets. Hospitalized patients and other patients with comorbidities and disabilities requiring assistance from health care workers are at particularly high risk of exposure and poor outcomes from COVID-19.

Effective and safe COVID-19 vaccines are authorized for use by the FDA and available to all ANTHC staff. Vaccinations provide immunity that reduces the chance of becoming sick from COVID-19 and decreases the infectivity of those who are asymptotically infected. Community herd immunity from vaccination is our only tool to end the pandemic and scale back other infection control measures, such as universal masking and physical distancing, in the future. More information about COVID-19 vaccines and the vaccine approval process is available and frequently updated on the CDC's website at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/>.

ANTHC, as a tribal organization, is not subject to the Civil Rights Act of 1964, and therefore does not accept religious exemptions/exceptions for any reason, including COVID-19 vaccination.

Please complete the form below. Should you have any questions, please contact ANTHC Employee Health at 907-729-4578, or Infection Prevention at 907-729-2921. Thank you.

The above person should not be immunized for COVID-19 for the following reasons (check all that apply):

- History of previous allergic reaction and documented allergy testing to indicate an immediate hypersensitivity reaction to the COVID-19 vaccine or a component of the vaccine. Please attach supporting DOCUMENTATION or MEDICAL RECORDS.
- Documentation of a positive PCR or antigen test for COVID-19 within the last 3 months. Please attach supporting DOCUMENTATION.
- Other- Please provide this information in a separate narrative that describes the exception in detail (these requests will be reviewed on a case-by-case basis).

I certify that _____ has the above contraindication and request a medical exception from COVID-19 vaccination.

Physician Signature: _____ Date: _____
 (Note: Signature stamp not acceptable)

Physician Medical License no: _____
 Please scan and submit this form via myHR or email to: AKA-EmployeeHealth@anthc.org Faxed copies are not accepted.

DESIGNATED OFFICE USE ONLY:
 Form Received: _____
 Medical Exception Approved on: / / Approving Staff Signature: _____
 Date of Creation: 4/17/2020
 Date of Revisions: 2/3/2022