



Section: 300 - Personnel

Subject: JHS COVID-19 Vaccination Policy

I. Purpose

The purpose of the Jackson Health System (JHS) COVID-19 Vaccination Policy (“this Policy”) is to comply with the Interim Final Rule on COVID–19 Health Care Staff Vaccination (Interim Final Rule) issued by the Centers for Medicare and Medicaid Services (CMS) on November 5, 2021, and related guidance promulgated by CMS.

All current and new employees are responsible for adherence to the content of this policy.

II. Procedure

A. Scope

1. This Policy will apply to all employees (both clinical and non-clinical staff) with the exception of individuals who provide services 100% remotely and who do not have any direct contact with patients and other non-remote staff (“fully-remote staff”).
2. This Policy will also apply as determined appropriate by JHS Infection Prevention and Control to:
 - a. Credentialed medical staff,
 - b. House staff,
 - c. Contractors,
 - d. Licensed independent practitioners,
 - e. On-site vendors,
 - f. Temporary workers,
 - g. Students,
 - h. Volunteers, and
 - i. Others.

B. Vaccination Guidelines

1. Effective January 28, 2022, all employees must comply with this Policy by either:
 - a. Becoming fully vaccinated from COVID-19 and providing proof of a COVID-19 vaccination.
 - b. Obtaining an approved medical or religious exemption, with the exception of fully-remote staff.
2. Employees are considered fully vaccinated under this Policy if it has been two weeks or more since they completed a primary vaccination series for COVID-19.
3. The completion of a primary vaccination series is defined as either the administration of a:
 - a. Single-dose vaccine such as the Johnson & Johnson COVID-19 Vaccine, or
 - b. Two doses of a multi-dose vaccine such as the Pfizer-BioNTech COVID-19 Vaccine or the Moderna/Spikevax COVID-19 Vaccine.

C. Proof of Vaccination

1. Employees providing proof of a COVID-19 vaccination must submit proof of their vaccination to the Badge Buddy tool (jacksonbadgebuddy.org):
 - a. A copy of their CDC vaccination card (or foreign equivalent in the case of house staff or employees who received their vaccinations abroad);
 - b. Official documentation issued by a State registry; or
 - c. An official medical record.
2. Proof of vaccinations may be audited.



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3. Employees subject to this Policy are required to wear the COVID-19 Vaccinated sticker on the employee's JHS ID badge as an easy way for co-workers, patients, and visitors to identify vaccinated employees and physicians.
- D. Guidelines for the Unvaccinated.
1. Effective January 28, 2022, all employees who have not provided proof of a COVID-19 vaccination to JHS in the manner required by this Policy, but who have an approved medical or religious exemption, will be required to wear an N95 respirator mask at all times inside of all JHS facilities, including clinical buildings and non-clinical areas.
 2. Unvaccinated employees who have an approved medical or religious exemption will not be permitted to remove their N95 masks inside of a JHS facility, therefore, all eating or drinking must be done outdoors.
 3. Employees who are not vaccinated, but who have an approved medical or religious exemption, will be restricted from attending in-person meetings, other than staff huddles on patient care units.
 4. Fit-tested N95 respirator masks will be provided to unvaccinated employees, including non-clinical.
- E. Non-Compliance
1. Employees who fail to comply with this Policy by failing to timely provide documentation of a COVID-19 vaccination or failing to timely apply for and obtain an approved medical or religious exemption will be considered non-compliant.
 2. Employees who are non-compliant will be ineligible to work as a JHS employee and will be removed from the work schedule and placed in no-pay status until they are in full compliance.
 3. JHS will provide notice to non-compliant employees and the consequences of such non-compliance.
 4. Employees who are not in compliance with this Policy within ten (10) business days after being notified of non-compliance by JHS are subject to disciplinary action.
 - a. Compliance with this policy must start within 10 business days of notification.
 - b. Compliance also mean that any process started, must also be completed within normal dosage protocol time frames and/or to full conclusion.
- F. Non-Affiliates
1. Individuals who are not employed by JHS, who physically access a JHS facility in connection with their employment, appointment, or education/training must be COVID-19 vaccinated or must show proof of an approved medical or religious exemption to continue to have access to JHS facilities.
 - a. Individuals who are not employed by JHS include:
 - i. Contractors,
 - ii. Licensed Independent Practitioners,
 - iii. Vendors,
 - iv. Students,
 - v. Volunteers and
 - vi. Others as determined appropriate by JHS executive leadership.
 2. Such individuals or entities who employ or sponsor or supervise these individuals who work, train, or otherwise access JHS facilities must provide an attestation stating that the individuals seeking access to JHS facilities (such as a contractor's employees or university students) have received the COVID-19 vaccination or have an approved medical or religious exemption that would qualify under the CMS Interim Final Rule.



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3. Failure to demonstrate compliance with the requirements of this Policy may result in the interruption of these individuals from participating in training or work to the extent it involves access to JHS facilities.

III. References

CMS Interim Final Rule

Responsible Party: Executive Vice President and Chief Human Resource Officer
Jackson Health System

Reviewing Committee(s): JHS Policy and Procedure Committee

Authorization: CEO, Jackson Health System