

SYSTEM POLICY

HR-66 - Vaccination Program for Employees

Owner: Human Resources

Key Points

- This policy applies to employees of The MetroHealth System (MHS).
- MHS seeks to protect patients and Workforce Members¹ from preventable, communicable infections, including influenza and COVID-19, and to reduce the risk of serious illnesses and hospitalization. To this end, MHS maintains an Influenza and COVID-19 Vaccination Program (the “Vaccination Program”) for Workforce Members.
- This policy outlines requirements of and procedures for the Vaccination Program for employees, including exemption requests and consequences of non-compliance.
- The Vaccination Program requirements for non-employed Workforce Members are set forth in Policy HR-84.

Policy

1. In order to protect patients, Workforce Members, and the community, MHS requires that employees be vaccinated against influenza and COVID-19 or be granted an exemption(s).
2. The Employee Health Clinic (EHC), Infection Prevention, and Human Resources coordinate the Vaccination Program. Infection Prevention and MHS Administration determine the timing of vaccination requirements.
3. The requirement that employees be fully vaccinated or have an approved exemption(s) is a condition of continued employment with MHS.
 - 3.1. In order to be fully vaccinated, individuals must receive all immunization doses, including any supplemental or booster doses, annually or as otherwise required by MHS.
 - 3.2. New employees must be fully vaccinated or receive an approved exemption(s) prior to their start date or within the timeframes required by MHS.
4. Recordkeeping
 - 4.1. MHS maintains records of vaccination status for employees.
 - 4.2. In order to provide proof of vaccination, employees:
 - 4.2.1. Receive their vaccination through services provided by the EHC; or
 - 4.2.2. Authorize MHS to access their vaccination status through their medical record; or
 - 4.2.3. Provide a copy of any of the following:
 - 4.2.3.1. A Centers for Disease Control and Prevention (CDC) COVID-19 vaccination record card;
 - 4.2.3.2. A World Health Organization (WHO) COVID-19 vaccination record card;
 - 4.2.3.3. Medical records documenting vaccination; or
 - 4.2.3.4. A report from a state immunization database.
 - 4.3. Employees may be required to disclose their vaccination status or provide proof of vaccination at any time.

5. Exemptions
 - 5.1. MHS recognizes that employees may have medical or non-medical bases on which to be exempted from one or more vaccines. Exemptions for receiving required vaccinations may be requested based on the following reasons:
 - 5.1.1. *Medical Contraindications*. MHS management, with appropriate clinical and management guidance, assesses medical conditions and situations for possible exemption, in accordance with current medical guidelines as applicable to the required vaccine(s).
 - 5.1.1.1. Medical contraindications and precautions for vaccination are identified by the CDC.
 - 5.1.1.2. Medical exemption documentation must include documentation signed and dated by a licensed practitioner acting within their respective scope of practice, recommending that the individual be exempted from vaccination requirements based on medical contraindications identified by the CDC.
 - 5.1.2. *Non-Medical Reasons*. MHS management, with appropriate guidance, assesses exemption requests for non-medical reasons, including a sincerely held religious, moral, or ethical belief, practice, or observance that does not allow vaccination.
 - 5.2. Employees who are granted an exemption(s) are required to follow all required additional health and safety precautions as outlined by management, which may not apply to fully vaccinated individuals. These requirements may include but are not limited to regular testing, masking, social distancing, health checks, restrictions on travel or activities, and changes in duties or work assignment.
6. Non-compliance. Employees who fail to be fully vaccinated or do not receive an approved exemption within the timeframe(s) set by MHS will be considered to have voluntarily resigned. Employees who otherwise fail to adhere with the requirements of this policy may also be subject to discipline in accordance with [HR-36 - Corrective Action](#) up to and including termination.
7. The requirements of the Vaccination Program may be changed by MHS at any time based on public health information, current medical guidelines, available vaccine supply and other relevant factors. This includes the addition of other required vaccines to the Vaccination Program.

End Notes

- ¹ Workforce Member: Employees, providers, volunteers, trainees, and other persons whose conduct, in the performance of work for MHS, is under the direct control of such entity, whether or not they are paid by MHS.

Attachments

[HR-66A - Influenza Vaccination Exemption Request Form](#)

[HR-66B - COVID-19 Vaccination Exemption Request Form](#)

Dates

Initiated February 22, 2012

Reviewed/Revised: July 2014, November 2016, July 2019, May 2020, May 2021, August 2021, February 2022

Approved

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MHS Policy Committee