

## Lehigh Valley Health Network Policy for COVID and Influenza Vaccines

**Notice: All Colleagues and Non-Employed LVHN Partners, including remote workers, will be required to be vaccinated after the first COVID-19 vaccine receives full FDA approval.**

### COVID Vaccine Policy

On Monday, Aug. 23, the U.S. Food and Drug Administration (FDA) granted full approval to the Pfizer-BioNTech COVID-19 vaccine. As a result, LVHN's COVID-19 vaccination policy will take effect Tuesday, Aug. 24. All colleagues, including remote workers, must receive their first dose or have submitted a medical or religious exemption request by Sept. 14. All colleagues who are not approved for exemption must complete the vaccine series by Oct. 19.

This means the FDA will have reviewed more than six months of data that supports the fact that the vaccine is safe and effective. This is the same rigorous assessment and approval process required for all other vaccines currently approved for use in the United States, many of which are required for employment at LVHN and other health care organizations.

- Now that the FDA has granted approval, unvaccinated colleagues will have three weeks to receive their first dose and eight weeks to complete the vaccine series.
- If the FDA should ever approve the need for a booster dose of the COVID-19 vaccine, all colleagues and non-employed LVHN partners will be required to receive it under this policy.
- This policy also applies to non-employed LVHN partners including volunteers, students and residents, services employees, vendors, contracted workers and others. These groups cannot request exemption and must be vaccinated to work in LVHN facilities. LVHN leaders with oversight of our non-employed partners are responsible for their compliance.
- This policy also applies to fully remote workers, including vendors and contracted workers.
- This policy applies to all vendor representatives visiting any LVHN location, including resources providing training, maintenance, and system implementation services.

### Revised Influenza Vaccine Policy

In 2021, all colleagues and non-employed LVHN partners also will be required to receive the influenza vaccine. Previously, only colleagues in patient-facing roles were required to get the influenza vaccine. Colleagues and independent medical staff may request a medical or religious exemption. Non-employed LVHN partners cannot request exemption. The revised policy is forthcoming. Details about our influenza vaccine clinics for colleagues will be shared as flu season approaches. Requiring all colleagues and non-employed LVHN partners to get the COVID-19 and influenza vaccines will help ensure we provide the safest possible care to our patients and keep colleagues and community members safe.

# LEHIGH VALLEY HEALTH NETWORK

## COVID-19 Universal Vaccination Policy – Human Resources

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### I. SCOPE:

Lehigh Valley Health Network (LVHN) adopts this policy for the following selected licensed entities:

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|---|--|
| <input checked="" type="checkbox"/> Lehigh Valley Hospital                                      | <input checked="" type="checkbox"/> Lehigh Valley Hospice                |
| <input checked="" type="checkbox"/> Lehigh Valley Hospital – Hazleton                           | <input checked="" type="checkbox"/> Pocono VNA / Hospice                 |
| <input checked="" type="checkbox"/> Lehigh Valley Hospital – Pocono                             | <input checked="" type="checkbox"/> Lehigh Valley Home Care – Schuylkill |
| <input checked="" type="checkbox"/> Lehigh Valley Hospital – Schuylkill                         | <input checked="" type="checkbox"/> Lehigh Valley Home Care – Hazleton   |
| <input checked="" type="checkbox"/> Transitional Skilled Unit                                   | <input checked="" type="checkbox"/> LVHN Children’s Surgery Center       |
| <input checked="" type="checkbox"/> Lehigh Valley Home Care                                     | <input checked="" type="checkbox"/> LVHN Surgery Center – Tilghman       |
| <input checked="" type="checkbox"/> Lehigh Valley Hospital – Coordinated Health Allentown       |  |
| <input checked="" type="checkbox"/> Lehigh Valley Hospital – Coordinated Health Bethlehem       |  |
| <input checked="" type="checkbox"/> LVHN East Stroudsburg Ambulatory Surgery Center             |  |
| <input checked="" type="checkbox"/> LVHN Ambulatory Surgery Center of Lopatcong (in New Jersey) |  |

Except where superseded by language contained in a collective bargaining agreement, this policy applies to all LVHN employees including but not limited to its subsidiaries identified above and their respective employees, Medical and Allied Health Professional Staff, and other personnel who work in LVHN facilities (such as vendors, contracted personnel, students, and volunteers). This policy does not apply to visitors.

### II. POLICY:

Consistent with its duty to provide and maintain a workplace that is free of recognized hazards and based on the belief that an unvaccinated person poses a direct threat to the health and safety of our patients and others, LVHN requires all LVHN colleagues to be fully vaccinated against COVID-19. This policy is also based upon vaccination guidance provided by the Centers for Disease Control and Prevention (CDC), and recommending bodies such as the Hospital Association of Pennsylvania, the American Hospital Association, the American Medical Association and the Society for Healthcare Epidemiology of America.

### III. DEFINITIONS:

LVHN Colleagues – Includes but is not limited to medical staff, nursing staff, and employees or contractors that provide therapeutic services, social services, housekeeping services, dietary services, and maintenance.

LVHN Facility -a physical location (e.g. fixed, mobile) where the employer’s work or operations are performed.

Fully vaccinated-2 weeks or more has passed after the final dose of a 2-dose series of a COVID, vaccine, such as the Pfizer or Moderna vaccines, or 2 weeks has passed after the single-dose vaccine, such as Johnson and Johnson’s Janssen vaccine.

**IV. PROCEDURE:****A. COVID-19 Immunization**

1. Every Individual identified under Section I., Scope, must be immunized against COVID-19 unless granted an exemption as explained in Section E.
2. The requirement for vaccination applies to any booster doses of the COVID-19 vaccine if booster doses are endorsed by CDC Advisory Committee for Immunization Practices (ACIP).
3. The deadline for vaccination will be within 3 weeks of the announced implementation date. If the two- dose vaccine is administered, the first dose must be completed within 3 weeks of the announced implementation date, and fully vaccinated by 8 weeks from the implementation date.
4. The deadline to receive the booster doses, if required as noted in IV. A. 2., will be within 3 weeks of the LVHN announcement of the requirement, providing the appropriate time frame has passed from the individual's initial vaccination(s), as recommended by ACIP.
5. COVID-19 vaccine is available free of charge to all individuals identified under Section I. Scope.
6. Reasonable paid time will be provided to LVHN employees for vaccination.
7. LVHN will provide vaccinations to employees through employee health services and to all personnel through designated LVHN COVID-19 clinic locations.
8. If LVHN employees covered by this policy are vaccinated outside of LVHN clinics, LVPG practices or Employee Health Services, they must provide evidence of immunization to Employee Health Services from the clinic site or authorized healthcare provider in order to establish that they received the vaccination/booster. Acceptable proof of immunization includes a CDC COVID-19 Vaccination Record Card, a receipt, a copy of the administration record, or a printed MyLVHN record.
9. New hires will be informed of this policy prior to hire and must show evidence of vaccination. If not previously vaccinated, new hires will be required to provide proof of at least one dose of a two dose vaccination series two weeks prior to beginning work as a condition of employment, unless granted an exemption as detailed in Section E. and have agreed to accept any reasonable accommodation offered. Completion of the vaccination series within the guidelines of the vaccine (Pfizer 3 weeks, Moderna 28 days, J&J one dose) will be the responsibility of the new hire and may result in removal from the workplace until such time as the requirement is met within a reasonable timeframe.

**B. Vaccination Related Recordkeeping**

1. Employee Health Services will maintain a record of employee and Medical/Allied Health Staff COVID-19 immunizations, exemptions, and declinations via the employee health management system.
2. Tracking of immunization data of other personnel included in the scope of this policy is the responsibility of the LVHN leader who has oversight of the function. LVHN leaders with oversight may request the assistance of Employee Health to track immunizations, providing they comply with the guidelines for submitting colleague demographic

information and providing documentation of personnel vaccinations obtained outside of LVHN to Employee Health Services.

3. So that supervisors can assure colleague compliance with this policy, Employee Health Services and Information Services, will coordinate supervisor's access to vaccination data. Access will be permitted in accordance with HRIS reporting hierarchy. The shared data will be limited to immunization status and exemptions.
- C. LVHN Supervisors, administrators, Chairs/Physicians-in-Chief, Vice Presidents and Medical Staff Services will be responsible for the enforcement of this policy and, if necessary, in the case of employees, to consult Human Resources in implementing the disciplinary process.

#### D. Compliance

1. All personnel covered in the Scope of this policy must adhere to the COVID-19 Universal Vaccination Policy as a condition of employment or access to LVHN facilities.
2. Failure to comply with the COVID-19 Vaccination Policy will result in a final warning. All LVHN employees who are not vaccinated or granted an exemption within two weeks of the final warning will be deemed to have resigned and will not be eligible to appeal the decision through the Fair Treatment policy. Non-employed members of the medical/allied health staff who fail to comply with the COVID-19 Vaccination Policy will result in a final warning. Non-employed members of the medical/allied health staff who are not vaccinated or granted an exemption within the two weeks of the final warning will be placed on suspension up to thirty (30) days. Failure to comply within the thirty (30) days will be considered an automatic resignation from the medical/allied health staff and are not entitled to a Fair Hearing and is not reportable to the National Practitioner Databank.
3. Contracted personnel, vendors, volunteers and other non-employed personnel who are not vaccinated will not be permitted to perform work for LVHN. Colleagues other than Independent Medical Staff and LVHN employees will not be permitted to request an exemption as noted in Section E.
4. Any unvaccinated employee or medical/allied health staff who is granted an exemption and fails to abide by any Infection Control Procedures offered as an accommodation will be subject to termination in the case of an employee and loss of medical/allied health clinical privileges and membership.

#### E. Request for Exemptions

1. Exemption to immunization will be granted for recognized medical contraindications or on the basis of sincerely held religious beliefs and practices.
2. Colleagues identified in Section I. Scope who are who are not employed by LVHN or on medical/allied health staff at LVHN or LVH-Pocono will be eligible to request an exemption.
3. Requests for exemption must be submitted to Employee Health Services-Cedar Crest within 3 weeks of the policy implementation date. Any exemption requests received in employee health from current employees or members of the medical/allied health staff after 3 weeks will not be accepted and the employee and/or medical/allied health staff. will receive a final warning. If not vaccinated within 2 weeks of the final warning, the colleague

will be deemed to have resigned and will not be eligible to appeal the decisions through the Fair Treatment Policy. Members of the medical/allied health staff who are not vaccinated or granted an exemption within the two-week of the final warning will be placed on suspension up to thirty (30) days. Failure to comply within the thirty (30) days will be considered an automatic resignation from the medical/allied health staff and is not entitled to a Fair Hearing and is not reportable to the National Practitioner Databank.

4. Individuals requesting exemption due to medical contraindications must submit a reasonable Accommodation Request Form. Attachment A- COVID-19 Universal Vaccination Medical Exemption Request form must be completed by their personal healthcare provider. In addition, medical documentation supporting allergies to vaccine components or other medical contraindications must accompany the forms.
5. Standard criteria for medical exemption will be established based upon recommendations from the Centers for Disease Control and Prevention. The standard criteria will be utilized for all requests and entities.
6. Temporary exemption requests will be considered for employees and medical/allied health staff who are pregnant, have an acute, febrile illness, or other condition deemed to be a temporary contraindication by Employee Health Services via the same process as outlined in E. 3. If an exemption is granted for a temporary medical condition, the individual must be vaccinated when the condition is resolved. For pregnancy, Attachment C – COVID-19 Universal Vaccination Temporary Pregnancy Exemption Request form must be completed and returned to Employee Health.
7. If the medical exemption is granted for a permanent condition (e.g. a life- threatening allergy to the vaccine components), the exemption does not need to be requested each year unless vaccine technology eliminates issues regarding the contraindication.
8. Each request for medical exemption will be evaluated individually by Employee Health Services and the final determination will rest with Employee Health Services.
9. Individuals requesting a bona fide religious exemption must submit Attachment B – COVID-19 Universal Vaccination Religious Exemption Request form and provide documentation supporting exemption.
10. Each request for exemption due to religious reasons will be evaluated individually by Legal Services.
11. The individual will receive a response in writing within ten (10) business days after presenting a request for exemption to Employee Health Services and if, granted, will include designation of temporary or permanent exemption status. Other responses may also include denials or notification of the need for additional information or additional time needed to make a determination on the request.
12. If an exemption request is granted, the accommodations established in order to safely permit the performance of work for the unvaccinated person will be reviewed and compliance acknowledged by the person seeking an exemption. A failure to adhere to the accommodations required for the exemption may result in termination of employment or loss of medical/allied health staff clinical privileges and membership.
13. If the exemption request is not approved the first vaccination must be received within 2 weeks of the denial of the exemption. If the two- dose vaccine is administered, the colleague must be fully vaccinated by 8 weeks from the denial date. Employees and medical/allied health staff who fail to comply with the policy timeline for either the first or second dose will receive a final warning and given two weeks to comply. If not vaccinated within 2 weeks of the final warning, the colleague will be deemed to have resigned and will not be eligible to appeal the decisions through the Fair Treatment Policy. Non-employed

members of the medical/allied health staff who are not vaccinated within the two weeks of the final warning will be placed on suspension up to thirty (30) days. Failure to comply within the thirty (30) days will be considered an automatic resignation from the medical/allied health staff and is not entitled to a Fair Hearing and is not reportable to the National Practitioner Databank.

**V. REFERENCES:**

**VI. FORMS: (Contact the local Employee Health Office for forms)**

**Attachment A: COVID-19 Universal Vaccination Medical Exemption Request form**

**Attachment B: COVID-19 Universal Vaccination Religious Exemption Request form**

**Attachment C: COVID-19 Universal Vaccination Temporary Pregnancy Exemption Request form**

**VII. DISCLAIMER:**

This policy and the implementing procedures are intended to provide a description of recommended courses of action to comply with statutory or regulatory requirements and/or operational standards. It is recognized that there may be specific circumstances, not contemplated by laws or regulatory requirements that make compliance inappropriate. For advice in these circumstances, consult with the Departments of Employee Health Services, Medical Staff Services and/or Legal Services, as appropriate.

**VIII. REVIEW:**

Origination: 08/2021  
Review / Revision: 08/2021 / 08/2021

<b>Approved by:</b> Lynn Turner, SVP & CHRO	<b>Approval Date:</b> 8/9/2021
<b>Version:</b> 1	<b>Publication Date:</b> 8/9/2021
<b>Original Creation Date:</b> 8/2021	<b>Next Review Date:</b> 8/2023

## **COVID-19 Vaccine Receives Full FDA Approval**

On Monday, Aug. 23, the U.S. Food and Drug Administration (FDA) granted full approval to the Pfizer-BioNTech COVID-19 vaccine. As a result, LVHN's COVID-19 vaccination policy will take effect Tuesday, Aug. 24. All LVHN non-employed partners must complete the vaccine series by Oct. 19. Those who are not vaccinated by Oct. 19 will not be permitted to work or conduct business inside an LVHN facility.

### **Four easy ways to get vaccinated**

- Schedule an appointment at [LVHN.org/appointments](https://www.lvhn.org/appointments).
- Schedule an appointment on MyLVHN.
- Call 833-584-6283 (833-LVHN-CVD). The COVID-19 Vaccine Hotline is open Monday-Friday 8:30 a.m.-5:30 p.m.
- Walk in any of these LVHN vaccine clinics; no appointment is needed:
  1. [COVID-19 Vaccine Clinic–Northampton Crossings](#)
  2. [COVID-19 Vaccine Clinic–Pocono](#)
  3. [COVID-19 Vaccine Clinic–Hazleton](#)
  4. [COVID-19 Vaccine Clinic–Schuylkill](#)
  5. [COVID-19 Vaccine Clinic–MacArthur Road](#)

The Pfizer vaccine is available at all LVHN vaccine clinics.

This policy applies to non-employed LVHN partners including volunteers, students and residents, Crothall, Morrison and valet services employees, vendors, contracted workers and others. These groups cannot request exemption and must be vaccinated to work in LVHN facilities.

### **Vaccines save lives**

Visit the [COVID-19 FAQs page on LVHN.org](#) for detailed information about vaccine safety and effectiveness.

Thank you for doing your part, for getting immunized and creating Better Days Ahead.