

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22	Page	1	of	7
		Effective:	04/22				

Affiliate(s):	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Hospital: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Clifton Springs <input checked="" type="checkbox"/> NWCH <input checked="" type="checkbox"/> RGH <input checked="" type="checkbox"/> UMMC <input checked="" type="checkbox"/> Unity <input checked="" type="checkbox"/> Unity Specialty Hospital <input checked="" type="checkbox"/> Hospital Subcategories: <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Inpatient Services <input checked="" type="checkbox"/> Outpatient Services <input checked="" type="checkbox"/> ElderOne (ext. clinics) <input checked="" type="checkbox"/> PCASI <input checked="" type="checkbox"/> SMS <input checked="" type="checkbox"/> Behavioral Health <input checked="" type="checkbox"/> Rochester Regional Health Home Care <input checked="" type="checkbox"/> Rochester Regional Health Hospice Care <input checked="" type="checkbox"/> Rochester Regional Health Home Infusion Pharmacy <input checked="" type="checkbox"/> Rochester Regional Health Hospice Care (Hildebrandt Campus) <input checked="" type="checkbox"/> CompassionNet <input checked="" type="checkbox"/> Genesee Region Home Care of Ontario County, Inc. 	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Long Term Care <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Clifton Springs Nursing Home <input checked="" type="checkbox"/> DeMay Living Center <input checked="" type="checkbox"/> Edna Tina Wilson Living Center <input checked="" type="checkbox"/> Park Ridge Living Center <input checked="" type="checkbox"/> Unity Living Center <input type="checkbox"/> ACM Laboratory <input checked="" type="checkbox"/> Ambulatory Surgery Center <input checked="" type="checkbox"/> Elder One - PACE <input checked="" type="checkbox"/> NonArticle 28 Practices (WNY) <input checked="" type="checkbox"/> PRCD, Inc. <input checked="" type="checkbox"/> RMHC
----------------------	---	--

For purposes of this policy, "Rochester Regional Health" shall collectively refer to the affiliates identified in the header of the policy except those outside the U.S.

Policy Statement: At Rochester Regional Health ("RRH"), our mission is to enhance lives and preserve health. This has never been more critical as we confront the rapid spread of the highly contagious COVID-19 Delta variant. The New York State Department of Health (NYS DOH) has mandated that covered entities continuously require all covered personnel to be fully vaccinated against COVID-19. Consistent with this mandate, Rochester Regional Health will require all employees and affiliated staff members to be fully vaccinated against COVID-19, unless they have an approved exemption and related accommodation.

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22	Page	2	of	7
		Effective:	04/22				

Scope	This policy will apply to all employees of any affiliate of Rochester Regional Health, as well as all Affiliated Staff Members that work within any Rochester Regional Health facility, including but not limited to members of the Medical Staffs, agency staff, contractors, students, and volunteers.
--------------	--

Definitions	<p><u>Fully Vaccinated</u> – Receipt of either: (1) the second dose in a two-dose vaccine series or (2) a single-dose vaccine, which is authorized for emergency use or approved by the U.S. Food and Drug Administration or holds an emergency use listing by the World Health Organization for prevention of COVID-19 infection. This definition is subject to change, consistent and in accordance with applicable state and/or federal guidelines and recommendations.</p> <p><u>Boosted</u> – Receipt of, within 30 days of becoming eligible to receive, any booster or supplemental dose of a COVID-19 vaccine as recommended by the Centers for Disease Control and Prevention (“CDC”) (for booster dose eligibility, see Different COVID-19 Vaccines CDC). This definition is subject to change, consistent and in accordance with applicable state and/or federal guidelines and recommendations.</p> <p><u>RRH Employees</u> – Any employee of any affiliate of Rochester Regional Health, including but not limited to, Behavioral Health Network, Inc., Genesee Region Home Care Association, Inc., d/b/a Rochester Regional Health Home Care / Rochester Regional Health Hospice Care, Genesee Region Home Care of Ontario County, Inc., , Independent Living For Seniors, Inc. d/b/a ElderOne, Newark-Wayne Community Hospital, Inc., North Park Nursing Home, Inc. d/b/a Edna Tina Wilson Living Center, Park Ridge Nursing Home, Inc., PRH, Inc., Rochester General Hospital, , The Clifton Springs Sanitarium Company d/b/a Clifton Springs Hospital & Clinic, The Unity Hospital of Rochester, and United Memorial Medical Center.</p> <p><u>Affiliate Staff Members</u> – Anyone who is not an RRH Employee, but who works within an RRH facility, including but not limited to members of the Medical Staffs, agency staff, contractors, students, and volunteers.</p> <p><u>Documentation of Vaccination</u> – Unless otherwise specified by NYS DOH, documentation of vaccination must include the manufacturer, lot number(s), date(s) of vaccination; and vaccinator or vaccine clinic site, in one of the following formats: (i) record prepared and signed by the licensed health practitioner who administered the vaccine, which may include a CDC COVID-19 vaccine card; (ii) an official record from one of the following, which may be accepted as documentation of immunization without a health practitioner’s signature: a foreign nation, NYS Countermeasure Data Management System (CDMS), the NYS Immunization Information System (NYSIIS), City Immunization Registry (CIR), a NYS</p>
--------------------	---

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22				
		Effective:	04/22	Page	3	of	7

	DOH-recognized immunization registry of another state, or an electronic health record system; or (iii) any other documentation determined acceptable by NYS DOH.
Policy	<p><u>Current RRH Employees and Affiliated Staff Members:</u></p> <p>All current RRH Employees and Affiliated Staff Members must provide and continue to provide, current Documentation of Vaccination showing that they are Fully Vaccinated and, as applicable, Boosted. Any RRH Employee that has not provided such required Documentation of Vaccination and has not been granted an exemption and/or an accommodation, will be terminated.</p> <p>Any RRH Affiliated Staff Member that has not provided such required Documentation of Vaccination and has not been granted an exemption and/or an accommodation will not be permitted to work within an RRH facility until they have supplied required Documentation of Vaccination. The attached letter to agencies and contractors (Attachment 5) should be used to inform agencies and contracting organizations that provide RRH Affiliated Staff Members about Rochester Regional Health’s procedures for submitting such required Documentation of Vaccination.</p> <p>All volunteers must be Fully Vaccinated and Boosted to volunteer within an RRH facility.</p> <p><u>New RRH Employees and Affiliated Staff Members:</u></p> <p>Any new RRH Employee or Affiliated Staff Member who becomes employed or affiliated must provide, and continue to provide, current Documentation of Vaccination showing that they are Fully Vaccinated and, as applicable, Boosted. Any new RRH Employee that fails to provide the required Documentation of Vaccination prior to their start date, and who has not been granted an exemption and/or an accommodation, will not be permitted to work.</p> <p>Any new RRH Affiliated Staff Member that fails to provide the required Documentation of Vaccination prior to their start date, and has not been granted an exemption and related accommodation, will not be permitted to work within an RRH facility until they have supplied current Documentation of Vaccination showing that they are Fully Vaccinated and, as applicable, Boosted.</p>

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22	Page	4	of	7
		Effective:	04/22				

Procedure

RRH Employee and Affiliated Staff Member Procedure for Submitting Documentation of Vaccine:

RRH Employees and Affiliated Staff Members who were Fully Vaccinated and Boosted through RRH Employee Health require no further action. RRH Employees and Affiliated Staff Members who were Fully Vaccinated and Boosted at an outside facility must submit their Documentation of Vaccination to WorkReady’s employee portal, [Enterprise Health](#).

RRH Employee Procedure for Requesting a Medical Exemption and Accommodation:

In accordance with Section 2.61 of Title 10 of the New York Codes, Rules and Regulations as well as applicable local, state, and federal laws and regulations, RRH will evaluate requests for exemptions and reasonable accommodations based on medical reasons in place of the COVID-19 vaccination requirement. RRH Employees seeking medical exemptions and accommodations are required to submit a complete [Request for Reasonable Accommodation Based on Medical Reasons Form \(Attachment 1\)](#), which can be located on the Employee COVID-19 Toolkit.

RRH employees will be required to complete Part I of the form, and either a physician, certified nurse practitioner or physician’s assistant will be required to complete Part II of the form. Consistent with NYS DOH regulations, the physician, certified nurse practitioner or physician’s assistant must certify that immunization with the COVID-19 vaccine would be detrimental to a person’s health based upon a pre-existing health condition, and must be in accordance with generally accepted medical standards. Once complete, RRH employees must submit the form to EHS at accommodations@rochesterregional.org.

Requests for medical exemptions will be reviewed by a multidisciplinary committee consisting of representatives from EHS, Human Resources (HR), Chief Medical Officer (CMO) Council, and the Office of Counsel. In the event the decision is to grant the request for medical exemption, EHS, working with HR, shall engage in an interactive process with the RRH employee, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances, taking into account the nature of the staff member’s duties among other considerations, and what that accommodation should be. EHS may consult with relevant specialists (e.g., Infection Prevention).

EHS shall be responsible for communicating its determination to the RRH employee and maintaining a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of EHS shall be final.

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22				
		Effective:	04/22	Page	5	of	7

RRH Employee Procedure for Requesting a Religious Accommodation:

In accordance with Title VII of the Civil Rights Act of 1964 and other applicable local, state, and federal laws and regulations, RRH will evaluate requests for accommodations of sincerely held religious beliefs in conflict with the COVID-19 vaccination requirement. RRH is permitted to grant an accommodation only if the employee can perform their job one hundred percent (100%) remotely, without creating an undue hardship for RRH. RRH is not permitted to accommodate any employee who is not vaccinated based on a sincerely held religious beliefs in conflict with the COVID-19 vaccination requirement if that employee’s job requires that they engage in any activities such that if they were infected with COVID-19, they could potentially expose other employees or affiliated staff members, patients or residents to the disease.

RRH Employees seeking a religious accommodation must submit a completed Employee Religious Accommodation Request Form ([Attachment 3](#)), which is located on the Employee COVID-19 Toolkit: <https://www.rochesterregional.org/coronavirus-covid19/employee-toolkit>. Once complete, RRH employees should submit the form to accommodations@rochesterregional.org.

Requests for religious accommodations will be reviewed by the employee’s management, along with representatives from HR and the Office of Counsel. In the event the decision is to grant the request for religious accommodation, RRH will engage the employee in an interactive process, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances and does not cause an undue hardship for RRH.

RRH will communicate its determination to the employee and maintain a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of RRH shall be final.

RRH Affiliate Staff Procedure for Seeking Medical Exemptions:

1. Members of the Medical Staffs – Follow the same process outlined above for RRH Employees.

2. Students – Students are required to work with their school to request a medical exemption. If a medical exemption is granted, students will be required to submit an attestation form ([Attachment 2](#)) from their school confirming that the exemption request was

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22	Page	6	of	7
		Effective:	04/22				

granted. The completed attestation should be submitted to accommodations@rochesterregional.org. At this point, RRH EHS will engage in an interactive process with the student, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances, taking into account the nature of the student’s duties among other considerations, and what that accommodation should be. EHS may consult with relevant specialists (e.g., Infection Prevention). EHS will communicate its determination to the student and maintain a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of EHS shall be final.

3. Agency Staff and other Contractors – Agency staff/contractors are required to work with their employer to request a medical exemption. The attached letter to agencies and contractors (Attachment 5) should also be used to inform agencies and contracting organizations that provide RRH Affiliated Staff Members about Rochester Regional Health’s procedures for requesting a medical exemption. If a medical exemption is granted, agency staff/contractors will be required to submit an attestation form ([Attachment 2](#)) from their employer confirming that the exemption request was granted. Once complete the attestation should be submitted to accommodations@rochesterregional.org. At this point, RRH EHS will engage in an interactive process with the agency staff/contractor, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances, taking into account the nature of the agency staff/contractor’s duties among other considerations, and what that accommodation should be. EHS may consult with relevant specialists (e.g., Infection Prevention). EHS will communicate its determination to the agency staff/contractor and maintain a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of EHS shall be final.

RRH Affiliated Staff Member Procedure for Requesting Religious Accommodations:

1. Members of the Medical Staffs – Follow the same process outlined above for RRH Employees.

2. Students – Students are required to work with their school to request a religious accommodation. If a religious accommodation is granted, students will be required to submit an attestation form ([Attachment 4](#)) from their school confirming that the accommodation request was granted. The completed attestation should be submitted to accommodations@rochesterregional.org. At this point, RRH will engage in an interactive process with the student, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances, taking into account the nature of the student’s duties among other considerations, and what that accommodation should be. RRH will communicate its determination to the student and maintain a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of RRH shall be final.

Policy & Procedure

Title:	COVID-19 Vaccine Requirement for Rochester Regional Health Employees and Affiliated Staff Members	Date of Origin:	09/21	Policy #	AD102		
		Last Reviewed:	04/22				
		Last Revised:	04/22	Page	7	of	7
		Effective:	04/22				


3. Agency Staff and other Contractors – Agency staff/contractors are required to work with their employer to request a religious accommodation. If a religious accommodation is granted, agency staff/contractors will be required to submit an attestation form ([Attachment 4](#)) from their employer confirming that the exemption request was granted. Once complete the attestation should be submitted to accommodations@rochesterregional.org. At this point, RRH will engage in an interactive process with the agency staff/contractor, in accordance with state and federal law, to determine if there is a reasonable accommodation that is appropriate under the circumstances, taking into account the nature of the agency staff/contractor’s duties among other considerations, and what that accommodation should be. RRH will communicate its determination to the agency staff/contractor and maintain a confidential record of the request and determination, in accordance with applicable law and internal policies. The determination of RRH shall be final.

Sanctions:

- Any RRH Employee or Affiliated Staff Member found to have falsified any information submitted in connection with a request for exemption or reasonable accommodation shall be subject to corrective action up to and including termination of employment or affiliation, as applicable.

- Attachment 1 – [Employee Request for Medical Exemption From COVID-19 Vaccination Requirement, Provider Certification and Reasonable Accommodation Form](#)
 Attachment 2 – [Affiliate Attestation Form Medical Exemption From COVID-19 Vaccination Requirement](#)
 Attachment 3 – [Employee Religious Accommodation Request Form](#)
 Attachment 4 – [Affiliate Attestation Form Religious Accommodation Related to COVID-19 Vaccination Requirement](#)
 Attachment 5 – [Letter to Agencies and Contractors](#)

References:

	<u>Signature</u>	<u>Name</u>	<u>Title</u>	<u>Date</u>
Approvals		Robert Mayo, MD	EVP, Chief Medical Officer	4/8/2022