

Main Line Health, Inc. and Main Line Health, Inc. Subsidiaries			
Working Together to Serve the Community			
This policy applicable to:	All Subsidiaries All Hospitals All Acute Care Hospitals	BMRH Mirmont Treatment Center	MLHC

EMPLOYEE HEALTH POLICY AND PROCEDURE MANUAL

Subject:

COVID-19 Vaccination Policy, Non-patient

Policy Purpose:

To protect patients, employees, students, volunteers, and members of the Medical Staff from COVID-19 infection through vaccination.

Policy Statement:

All Main Line Health (MLH) employees and appointees to the Main Line Hospitals and Bryn Mawr Rehabilitation Hospital Medical and SHP Staffs (“Medical Staff”) must comply with the COVID-19 New Hire Vaccination Policy as outlined below.

Performed by:

MLH Occupational Health Services, Physicians, Registered Nurses, LPNs, Physician Assistants, and Medical Assistants under a Physician’s direction.

Procedure

New Hires and Medical Staff Appointees:

- A. COVID-19 vaccination will be offered/required by MLH Occupational Health to on-boarding employees and Medical Staff as of September 1, 2021.
- B. The following will need to be met to be medically cleared to begin employment or practice at an MLH facility:
 - 1. Proof of two prior documented Pfizer or Moderna COVID-19 vaccines or one documented Johnson & Johnson COVID-19 vaccine.
 - 2. Proof of one prior documented Pfizer or Moderna COVID-19 vaccine #1 at an outside event, with a scheduled time for vaccine #2 within 45-days.
 - 3. Documented COVID-19 vaccine #1 at MLH Occupational Health Services at the time of the on-boarding evaluation or MLH vaccine site, with a scheduled plan for vaccine #2 within 45-days.
 - 4. An approved religious or medical exemption. Forms are available through Occupational Health Services.

Current Employees and Medical Staff:

- A. Main Line Health is requiring full vaccination for all MLH executives, directors, managers and Medical Staff by October 1, 2021. All other MLH employees will be required to be fully vaccinated by November 1, 2021.
- B. Employees and Medical Staff who have been vaccinated outside of Main Line Health are required to provide proof of vaccination by September 15, 2021.
- C. Employees will not be permitted to work after the established deadlines of October 1 and November 1, 2021 and will be given 2-weeks to initiate the vaccination process before termination of employment occurs.

Record Keeping / Vaccine Administration

- A. Occupational Health Services will maintain records of COVID-19 vaccinations for employees. The Medical Staff Office will maintain records of COVID-19 vaccination for Medical Staff.
- B. In the event of a COVID-19 vaccination shortage, MLH will evaluate the shortage and vaccination requirements and priorities for the entire health system. Occupational Health, Infection Prevention, Human Resources, Pharmacy, and Administration will conduct the evaluation with other departments as needed when vaccine shortages occur. COVID-19 vaccine will be offered to healthcare providers based on job function and risk of exposure to COVID-19. Priority will be given to those who provide direct hands-on patient care with prolonged face-to-face contact with patients and/or have the highest risk of exposure to patients with COVID-19.

Exemptions:

- A. Exemption to vaccination may be granted for a valid medical condition or sincerely held religious belief.
- B. New Hires, current Employees and Medical Staff requesting a medical exemption from the MLH COVID-19 vaccination requirement must provide proof such as a letter from their physician and complete the attached form (Appendix A). Requests made for temporary medical exemptions shall provide an exemption expiration date and may be renewed if necessary. Requests for a medical exemption will be evaluated by the COVID-19 Vaccine Exemption Review Committee. If a medical exemption is granted, the requesting individual will be notified in writing by Occupational Health Services within 2 weeks. If the request is granted for a permanent medical condition, another exemption does not need to be requested if COVID booster vaccines are recommended by the CDC.
- C. A request for a religious exemption from the COVID-19 vaccination requirement will be evaluated by the MLH COVID-19 Vaccine Religious Exemption Committee. A religious exemption from the vaccination requirement will be approved only for a sincerely held belief precluding COVID-19 vaccination that is religious in nature. Personal beliefs or opinions will not be sufficient to qualify for exemption from the COVID-19 vaccination requirement. A person requesting a religious exemption must complete the MLH Religious Exemption Form (Appendix B). Individuals requesting a religious exemption will be required to describe the sincerely held religious belief preventing them from receiving the COVID-19 vaccination. Additional information will be requested to support an individual's request for an exemption based upon a sincerely held religious belief, including but not limited to their prior vaccination history. Individuals whose beliefs are derived from an organized religion may submit documentation from individuals including leaders from that organization to support their request. Requests for exemptions and any supporting documentation will be submitted to MLH Human Resources or the MLH or Bryn Mawr Rehabilitation Hospital Medical Staff Credentials Committee, as applicable. The requesting person will be notified in writing by Human Resources or the MLH or Bryn Mawr Rehabilitation Hospital Medical Staff MEC within 2 weeks if the exemption has been granted or denied. An employee may appeal a denial within 5 days from the receipt of the decision, in writing to the MLH Senior Vice President, Human Resources and the MLH Senior Vice President, Legal Affairs / General Counsel. Medical Staff may appeal a denial in writing to the applicable Medical Staff MEC. This appeal will be reviewed, and the employee or appointee will be notified of the final decision within 2 weeks.
- D. If an exemption is granted, efforts will be made to reasonably accommodate the employee or Medical Staff while maintaining a safe work environment for patients, staff, and others. Weekly testing will be required for those granted a medical or religious exemption. Reasonable accommodations may include reassignment and additional infection prevention and control measures, among other things. While MLH will seek to identify reasonable accommodations for anyone who is granted a religious exemption, it is

possible that there may not be a reasonable accommodation that will allow every person with such an exemption to continue to work onsite while unvaccinated.

- E. Requests for medical and religious exemptions must be made by September 15, 2021. Appointees to the Medical Staff who request exemptions may not begin practice until the exemption is approved.
- E. Employees and Medical Staff may be subject to MLH Performance Management up to and including termination and/or administrative suspension of clinical privileges and referral to the Medical Executive Committee of Main Line Hospitals or Bryn Mawr Rehabilitation Hospital for appropriate action, as applicable, if any information provided in support of their exemption request is false.

References:

<https://www.cdc.gov/coronavirus/2019-ncov/vaccines/index.html>

Origination Date: 7/15/2021

Key Contact: System Medical Director, Employee Health and Safety, System Director, Infection Prevention

Approved: Covid-19 Steering Committee