

WellSpan Health adopts the following policy and procedure for the following specifically-named entities

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| <input checked="" type="checkbox"/> Apple Hill Surgical Center | <input checked="" type="checkbox"/> Philhaven | <input checked="" type="checkbox"/> VNA Home Health and Services |
| <input checked="" type="checkbox"/> WellSpan Medical Equipment | <input checked="" type="checkbox"/> WellSpan Medical Group | <input checked="" type="checkbox"/> WellSpan Pharmacy |
| <input checked="" type="checkbox"/> WellSpan Chambersburg Hospital | <input checked="" type="checkbox"/> WellSpan Surgery and Rehabilitation Hospital | <input checked="" type="checkbox"/> WellSpan Ephrata Community Hospital |
| <input checked="" type="checkbox"/> WellSpan Gettysburg Hospital | <input checked="" type="checkbox"/> WellSpan Good Samaritan Hospital | <input checked="" type="checkbox"/> WellSpan Waynesboro Hospital |
| <input checked="" type="checkbox"/> Summit Physician Services | <input checked="" type="checkbox"/> WellSpan Health System Corporate Locations | <input checked="" type="checkbox"/> WellSpan York Hospital |
| <input checked="" type="checkbox"/> Dr. Roy A. Himelfarb Surgery Center | <input checked="" type="checkbox"/> WellSpan Population Health Services | <input checked="" type="checkbox"/> WellSpan Endoscopy Center |

PURPOSE: COVID-19 is a highly transmissible and potentially fatal respiratory virus. Healthcare institutions are areas of potentially high rates of transmission of contagious diseases, particularly respiratory illnesses like COVID-19. Preventing the spread of COVID-19 is a top healthcare priority, particularly since the spread of COVID-19 can, in extreme enough circumstances, negatively affect WellSpan’s ability to provide adequate medical treatment to the communities we serve. Several vaccines have been developed to prevent the spread of COVID-19 and to mitigate the disease’s severity in those rare instances when vaccinated individuals are infected. These vaccines have been proven safe and effective. These vaccines constitute the most effective means of preventing the spread of COVID-19 and the consequences of the COVID-19 disease, which can include loss of productivity, severe prolonged illness, hospitalization, and death. The purpose of this policy is to ensure compliance with CMS’s requirement by establishing consistent COVID-19 guidelines for all Staff subject to this Policy.

DEFINITIONS:

“**Booster,**” per CDC, refers to a dose of vaccine administered when the initial sufficient immune response to the primary vaccination series is likely to have waned over time.

“**Clinical contraindication**” refers to conditions or risks that precludes the administration of a treatment or intervention. With regard to recognized clinical contraindications to receiving a COVID-19 vaccine, refer to the CDC informational document, Summary Document for Interim Clinical Considerations for Use of COVID-19 Vaccines Currently Authorized in the United States. For COVID-19 vaccines, according to the CDC, a vaccine is clinically contraindicated if an individual has a severe allergic reaction (e.g., anaphylaxis) after a previous dose or to component of the COVID-19 vaccine or an immediate (within 4 hours of exposure) allergic reaction of any severity to a previous dose or known (diagnosed) allergy to a component of the vaccine.

“**Entity**” or “**Entities**” for purposes of this policy, Entity refers to any WellSpan entity or program that is subject to this policy.

“**Fully vaccinated**” refers to Staff who are two weeks or more from completion of their primary vaccination series for COVID-19.

“**Independent Credentialed Providers**” refers to providers who are not employed by WellSpan Health and have been granted clinical privileges and/or medical staff membership at a WellSpan Entity. For purposes of this Policy, WellSpan employed providers who have been granted clinical privileges and/or medical staff membership at a WellSpan Entity will be treated as employees.

“**Non-employee**” for purposes of this policy, Non-employee refers to an individual who is not employed by WellSpan Health.

“**Primary Vaccination Series**” refers to Staff who have received a single-dose vaccine or all required doses of a multi-dose vaccine for COVID-19.

“**Staff**” refers to employees; credentialed providers; adult students, trainees, and volunteers; and individuals who provide care, treatment, or other services for the Entity and/or its patients, under contract or by other arrangement. Staff does not include:

- any Non-employee who provides only telemedicine services,
- any Non-employee who provides services who does not have any direct contact (more than incidental contact) with patients or Staff,
- any Non-employee who very infrequently provides ad hoc non-healthcare services (such as generator testing, equipment maintenance, etc.), or
- any Non-employee who provides services that are performed exclusively off-site, not at or adjacent to any site of patient care
- any Non-employee who provides services that are performed exclusively within a construction zone that does not have any direct contact with patients or Staff.

“**Temporarily delayed vaccination**” refers to vaccination that must be temporarily postponed, as recommended by CDC, due to clinical precautions and considerations, including, but not limited to, individuals with acute illness secondary to COVID-19, or individuals who received monoclonal antibodies or convalescent plasma for COVID-19 treatment in the last 90 days.

SCOPE: All Staff for Entities as defined in this Policy.

POLICY:

- I. All Staff must be fully vaccinated for COVID-19.
 - A. Unless the Staff member has obtained an exemption in accordance with Part II below, or the Staff member’s COVID-19 vaccination has been temporarily delayed as outlined in this Policy, all Staff must receive the then current WellSpan Vaccination Requirement as outlined in Attachment A of this policy.
 - B. WellSpan Health continues to follow all standards of infection prevention and control practice, for reducing the transmission and spread of COVID-19, especially by those Staff who are unvaccinated or who are not yet fully vaccinated.

PROCEDURE:

I. Compliance

- A. Proof of vaccination compliance:
 - i. Unless the Staff member has obtained an exemption in accordance with Part II below or the Staff member’s COVID-19 vaccination has been temporarily delayed as outlined in this Policy, the Staff member must have received the then current WellSpan Vaccination Requirement as outlined in Attachment A of this policy prior to providing any care, treatment, or other services for the Entity and/or its patients.
 - ii. Staff may obtain the required COVID-19 vaccination(s) free of charge through WellSpan or Staff may obtain the required COVID-19 vaccination(s) through an outside provider.
 - iii. Staff who have not obtained an exemption in accordance with Part II below must provide proof of COVID-19 vaccination(s) consistent with the then current WellSpan Vaccination Requirement as outlined in Attachment A of this policy, in order to demonstrate their compliance with this policy.
 - iv. WellSpan has a process to track and secure documentation of the vaccine status of Staff whose vaccine is temporarily delayed. CDC recommends a temporary delay in administering the COVID-19 vaccination due to clinical precautions and considerations such as individuals with acute illness secondary to COVID-19 illness, and individuals who received monoclonal antibodies, or convalescent plasma for COVID-19 treatment.

- v. Examples of acceptable forms of proof of vaccination include:
 - 1. For WellSpan employees, staff contracted to WellSpan such as through a staffing agency, volunteers, residents and Project Search students, and Independent Credentialed Providers/Medical Staff -
 - a. CDC COVID-19 vaccination record card (or a legible photo of the card),
 - b. Documentation of vaccination from a health care provider or electronic health record as provided by Staff member, or
 - c. State immunization information system record.
 - 2. For students and trainees, in addition to the examples of acceptable forms of proof of vaccination outlined in IAV1, above, an attestation from the student or trainee's college or program outlining the proof of vaccination for the Staff member with an assurance that the college or program will provide copies of the additional details for the Staff member within three hours of a request by WellSpan or the Entity.
 - 3. For support staff providing services under contract or other arrangement to WellSpan or the Entity, in addition to the examples of acceptable forms of proof of vaccination outlined in IAV1, above, an attestation from the vendor or organization providing the service outlining the proof of vaccination for the Staff member with an assurance that the vendor or organization will provide copies of the additional details for the Staff member within three hours of a request by WellSpan or the Entity.

B. Enforcement

- i. Any WellSpan employee, resident or Project Search student who fails to demonstrate compliance with this policy will be placed on unpaid administrative leave for seven calendar days from the date of non-compliance. Unless such individual takes what WellSpan deems as sufficient steps to come into compliance with the COVID-19 vaccination requirement by the end of the seven calendar days, then such employee's employment will be terminated for insubordination and failure to meet qualification standards or in the case of a resident or Project Search student, such individual's participation in their program would be terminated.
- ii. Any Non-employee who fails to demonstrate compliance with this policy will have the following action taken depending on the individual's relationship with WellSpan:
 - 1. Staff contracted to WellSpan through a staffing agency – will not be permitted to provide services at a WellSpan Entity. Staffing agencies will provide assurances as part of their engagement with WellSpan that they will not provide any Staff to a WellSpan Entity unless the Staff member is in compliance with this policy.
 - 2. Independent Credentialed Providers
 - a. Currently credentialed independent providers will be subject to the automatic or administrative suspension processes as outlined in the Medical Staff Bylaws or other medical staff governance documents of the Entity where credentialed
 - b. Applicants will not be eligible to be granted clinical privileges or medical staff membership (if applicable) unless they are in compliance with this policy
 - 3. Students/Trainees – will not be permitted to participate in an educational or training program at an Entity unless they are in compliance with this policy. Colleges or programs that send students and/or trainees to a WellSpan Entity will provide assurances as part of their relationship with WellSpan that they will not send any students and/or trainees to a WellSpan Entity unless that student/trainee is in compliance with this policy.

4. Volunteers – will not be permitted to volunteer at an Entity unless they are in compliance with this policy.
5. Contracted Staff – will not be permitted to provide services at an Entity unless they are in compliance with this policy. Vendors or organizations that send Staff to a WellSpan entity to provide services will provide assurances as part of their relationship with WellSpan that they will not send any Staff to a WellSpan Entity unless that individual is in compliance with this policy.

II. Exemptions

- A. In appropriate circumstances, WellSpan will exempt Staff from the COVID-19 vaccination requirements if the individual demonstrates that she/he is medically contraindicated for COVID-19 vaccination or if the Staff demonstrates that her/his sincere religious beliefs prevent her/him from undergoing COVID-19 vaccination.
- B. All information or documents provided to WellSpan regarding an exemption request must be truthful and authentic. Any Staff who knowingly provides false or misleading information or who lies during the exemption process is subject to (as appropriate or applicable) immediate termination of employment, subjection to the relevant provisions of the Medical Staff Bylaws, expulsion from WellSpan’s educational programs or activities, cancellation of contractual relationship, or any other action that WellSpan deems appropriate under the circumstances.
- C. Staff who have been granted an exemption to COVID-19 vaccination requirements should adhere to national infection prevention and control standards for unvaccinated health care personnel.
- D. Employees: Newly hired employees must immediately submit an exemption request upon formal acceptance of a conditional offer of employment using the WellSpan Exemption Processes outlined in IIK, below, if an exemption is being requested. If an exemption request is submitted, the newly hired employee will not be cleared to begin employment until the exemption request has been submitted and approved.
- E. Residents and Project Search students: residents and Project Search students must submit an exemption request prior to initiating their program using the WellSpan Exemption Processes outlined in IIK, below, if an exemption is being requested. If an exemption request is submitted, the resident or Project Search student will not be cleared to have any direct contact with patients or staff until the exemption request has been submitted and approved.
- F. Independent Credentialed Providers: independent credentialed providers/medical staff must submit proof that the Staff member has been granted a valid exemption for medical or religious reasons by the employer or primary practice of the Staff member. The individual who signs the exemption documentation cannot be the same as the Staff member.
- G. Staff contracted to WellSpan through a staffing agency: the staffing agency for the Staff member must submit an attestation that the Staff member has been granted a valid exemption for medical or religious reasons by the staffing agency, a Contingency Plan consistent with the requirements of this policy and CMS requirements is in place for the Staff member, and an assurance that the staffing agency will provide will provide copies of any requested information to support compliance with this policy for the Staff member(s) within three hours of a request by WellSpan or the Entity.
- H. Students/Trainees: the college or program for the student or trainee must submit an attestation that the Staff member has been granted a valid exemption for medical or religious reasons by the college or program, a Contingency Plan consistent with the requirements of this policy and CMS requirements is in place for the Staff member, and an assurance that the college or program will provide will provide copies of any requested information to support compliance with this policy for the Staff member(s) within three hours of a request by WellSpan or the Entity.
- I. Volunteers: volunteers who have direct contact with patients or staff as a Staff member consistent with this policy must submit a request using the WellSpan Exemption Processes

outlined in IIK, below, if an exemption is being requested. If an exemption request is submitted, the volunteer will not be cleared to begin any volunteer work that has direct contact with patients or staff until the exemption request has been submitted and approved.

- J. Contracted staff: Vendors or organizations that send Staff to a WellSpan entity to provide services will provide assurances as part of their relationship with WellSpan that they will not send any Staff to a WellSpan Entity unless that individual is in compliance with this policy, including the granting of a valid exemption for medical or religious reasons by the vendor or organization that includes a Contingency Plan for the Staff member that is consistent with the requirements of this policy and CMS requirements. The vendor or organization will provide a list of Staff members to WellSpan or Entity and will provide copies of any requested information to support compliance with this policy for the Staff member(s) within three hours of a request by WellSpan or the Entity.
- K. WellSpan Exemption Processes (for Staff members as outlined in this Policy)
 - i. **Medical Exemptions**
 1. Staff requesting an exemption from the COVID-19 vaccination requirement for medical reasons must complete and submit the Medical Exemption Request Form, and provide all supporting documentation as outlined in this Policy
 - a. Medical exemption documentation must specify which authorized or licensed COVID-19 vaccine is clinically contraindicated for the Staff member and the recognized clinical reasons for the contraindication. The documentation must also include a statement recommending that the Staff member be exempted from the hospital's COVID-19 vaccination requirements based on the medical contraindications.
 - b. A Staff member who requests a medical exemption from vaccination must provide documentation signed and dated by a licensed practitioner acting within their respective scope of practice and in accordance with all applicable State and local laws. The individual who signs the exemption documentation cannot be the same individual requesting the exemption.
 - c. Documentation is to be submitted depending on the individual's relationship with WellSpan:
 - i. Employee documentation to Employee Health & Safety
 - ii. All other Staff to the appropriate WellSpan sponsoring department
 2. All requests for medical exemptions will be evaluated by the Medical Exemption Committee, an established group of WellSpan clinicians and administrators—appointed jointly by the Chief Medical Officer for the WellSpan Medical Group and the Senior Vice President of Human Resources—who will review the medical exemption request and determine whether or not to grant the requested exemption, or to provide an alternative manner of compliance. If the number of exemption requests are higher than expected, the Chief Medical Officer for the WellSpan Medical Group and the Senior Vice President of Human Resources are entitled to appoint as many panels of Medical Exemption Committee as necessary to process the number of medical exemption requests that have been received.
 3. The Medical Exemption Committee may request that an individual requesting a medical exemption provide additional information or documentation to support the requested exemption. Additionally, the Medical Exemption Committee may request that the individual requesting a medical exemption undergo additional evaluation by a WellSpan clinician.
 4. The granting of a medical exemption does not guarantee that such an exemption will remain in place forever. Instead, WellSpan may alter the

terms of an exemption if an individual's condition requiring exemption changes or if the contents of approved and commercially available vaccines change such that the basis for a previously granted medical exemption no longer applies.

5. The Medical Exemption Committee will utilize the CDC, APIC, ACOG, and other medical best practice standards and recommendations when evaluating medical exemption requests. WellSpan will not grant medical exemptions unless the CDC has endorsed the reason for granting the exemption as medically necessary.
 6. Decisions of the Medical Exemption Committee are final.
- ii. **Religious Exemptions**
1. An individual requesting an exemption from the COVID-19 vaccination requirement based on sincere religious beliefs must complete and submit the Religious Exemption Request Form—and any supporting documentation to: ReligiousExemptionReviewRequest@wellspan.org
 2. Along with the Religious Exemption Request Form, the individual requesting an exemption must provide a verification from a third party with personal knowledge of the individual's religious beliefs. This verification may be completed by a leader of the individual's religion (such as a priest, pastor, reverend, rabbi, imam, etc.) or a member of the same church, synagogue, mosque, or other religious community as the individual requesting the exemption. But this policy does not require that the verification form must be completed by such a religious leader or member of the requestor's religious community. The individual completing the form, though, must be an adult able to attest that the individual requesting the religious exemption does in fact sincerely hold religious beliefs that prevent her/him from undergoing the COVID-19 vaccination.
 - a. The individual completing the verification form must personally know the individual requesting the religious exemption.
 - b. The individual who signs the verification form cannot be the same individual requesting the exemption.
 3. The individual requesting the religious exemption may also submit documentation—such as books, pamphlets, religious texts, or other materials—that the individual believes demonstrates that he/she holds a sincere religious belief that prevents him/her from undergoing COVID-19 vaccination.
 4. All requests for religious exemptions will be evaluated by the Religious Exemption Review Committee, which will be comprised of a chaplaincy employee, a representative of the Department of Human Resources, an attorney with WellSpan's Office of the General Counsel, and a clinical and operational leader. The members of this Committee will be appointed jointly by WellSpan's General Counsel and the Senior Vice President of Human Resources. The Religious Exemption Review Committee will review the religious exemption request and determine whether or not to grant the requested exemption, or to provide an alternative manner of compliance. If the number of exemption requests are higher than expected, the General Counsel and the Senior Vice President of Human Resources are entitled to appoint as many panels of Religious Exemption Review Committees as necessary to process the number of religious exemption requests that have been received.
 5. In appropriate circumstances, the Religious Exemption Review Committee may request additional information from the individual requesting a religious exemption. Likewise, individuals requesting religious exemptions may be

- required to speak with the Religious Exemption Review Committee, a designee of the Committee, or a third-party evaluator to answer questions related to the individual's religious beliefs or their sincerity.
6. The Religious Exemption Review Committee may exempt an individual from the requirements of this policy if the Committee determines that the individual requesting exemption holds a sincere religious belief that prevents him/her from being vaccinated against COVID-19. With respect to this decision, there are a few important points to keep in mind:
 - a. The Religious Exemption Review Committee will not authorize an exemption unless the Committee determines that the requesting individual's belief is (a) religious in nature, (b) sincerely held, and (c) precludes COVID-19 vaccination. All three requirements must be satisfied.
 - i. In making this evaluation, the Religious Exemption Review Committee will evaluate whether the individual's sincerely held religious belief prevents the individual from receiving all commercially available COVID-19 vaccines whose use is authorized by the FDA or only certain COVID-19 vaccines. If an individual's sincerely held religious beliefs prevent the individual from receiving only a subset of COVID-19 vaccines, but another COVID-19 vaccine authorized for use by the FDA would not run afoul of the individual's articulated religious beliefs, then WellSpan may require that the individual undergo COVID-19 vaccination using a vaccine that does not violate the individual's articulated religious beliefs.
 - b. Even if the Religious Exemption Review Committee determines that all three required criteria have been satisfied, the Religious Exemption Review Committee may still deny the requested exemption if the Committee determines that granting the requested accommodation would impose an undue hardship on WellSpan's operations or its patient safety or workplace safety efforts. With respect to religious-based exemption requests, "undue hardship" means more than a trivial or minor effect.
 - i. To determine whether a requested religious exemption would impose an undue hardship, the Religious Exemption Review Committee is authorized to meet with or request information from WellSpan officials (including an appropriate member of the Human Resources Department, an appropriate clinician, or if an employee, the employee's supervisor) to request information related to the position performed by the individual requesting a religious exemption.
 7. Even if the Religious Exemption Review Committee approves a religious exemption, WellSpan reserves the right to alter the terms of the religious exemption if WellSpan learns of information calling into question the sincerity of the claimed religious belief or other circumstances suggesting that the basis for a previously granted medical exemption no longer applies. Decisions of the Religious Exemption Review Committee may be appealed by providing written notice to the Appeals Committee consisting of WellSpan's General Counsel, Senior Vice President of Human Resources, and Chief Compliance Officer. Decisions of the Appeals Committee are not appealable to any other WellSpan policy or program, official or entity. Any

such appeal requests must be emailed to the email below by the close of the second day following the individual's receipt of the Religious Exemption Review Committee's decision denying the requested accommodation:
ReligiousExemptionReviewRequest@wellspan.org

III. Contingency Plan

- A. Staff who are not yet fully vaccinated, or who have been granted an exemption or accommodation as authorized by law, or who have a temporary delay should adhere to national infection prevention and control standards for unvaccinated health care personnel.
- B. Staff who are not yet fully vaccinated, or who have been granted an exemption or accommodation as authorized by law, or who have a temporary delay must adhere to additional precautions that are intended to mitigate the spread of COVID-19. This may include:
 - i. Reassigning Staff who have not completed their primary vaccination series to non-patient care areas, to duties that can be performed remotely (i.e., telework), or to duties which limit exposure to those most at risk (e.g., assign to patients who are not immunocompromised, unvaccinated).
 - ii. Requiring Staff who have not completed their primary vaccination series to follow additional, CDC-recommended precautions, such as adhering to universal source control and physical distancing measures in areas that are restricted from patient access (e.g., staff meeting rooms, kitchen).
 - iii. Requiring weekly testing for exempted Staff and Staff who have not completed their primary vaccination series, until the requirements of this Policy are met.
 - iv. Requiring Staff who have not completed their primary vaccination series to use a NIOSH approved N95 or equivalent or higher-level respirator for source control, regardless of whether they are providing direct care to or otherwise interacting with patients.
- C. Staff who have been granted an exemption through the WellSpan Exemption Processes outlined in IIK, above, and Staff contracted through a staffing agency who have submitted proof that they have been granted a valid exemption for medical or religious reasons are required to have weekly testing for COVID-19 completed as outlined in WellSpan's then current process for compliance with the CMS requirement for weekly testing.

IV. Tracking and Documentation

- A. WellSpan will track and document Staff COVID-19 vaccination status. This will include the specific vaccine received, and the dates of each dose received, or the date of the next scheduled dose for a multidose vaccine.
- B. WellSpan will track and document Staff COVID-19 vaccination medical and religious exemption records.
- C. WellSpan will track and document vaccination status of Staff for whom COVID-19 vaccination must be temporarily delayed, including when the identified Staff can safely resume their vaccination.
- D. WellSpan will track and document any recommended booster Staff doses, and any recommended additional doses for individuals who are immunocompromised, in accordance with the recommended timing of such doses in the then current WellSpan Vaccination Requirement as outlined in Attachment A of this policy..
- E. Copies of Staff COVID-19 vaccination records, and any required supporting documentation, will be stored in the Staff member's confidential health file.
- F. WellSpan's tracking system will be maintained in a secure manner and will be able to:
 - i. Indicate the position or role of each Staff member, including assigned work area and how they interact with patients;
 - ii. Produce a list of all Staff and their vaccine status, including Entity level detail; and
 - iii. Produce a list that includes the percentage of unvaccinated Staff, excluding those

Staff that have approved exemptions, including Entity level detail.

- G. WellSpan’s tracking system may consist of multiple modules based on the Staff type.
- H. To demonstrate that WellSpan employees have successfully complied with this policy and CMS requirements, WellSpan will share immunization status and/or test results with the WellSpan Employee Health and Safety department and will notify employees that WellSpan will be sharing immunization status and/or test results with the WellSpan Employee Health and Safety department.

WellSpan reserves the right to amend, adjust, or supplement this policy at any time. Likewise, WellSpan reserves the right to interpret the policy’s deadlines and requirements consistent with the policy’s purpose.

REFERENCE:

- 1. Attachment A – Current Vaccination Requirements
- 2. Attachment B – Quick Reference Tool
- 3. [Summary Document for Interim Clinical Considerations for Use of COVID-19 Vaccines Currently Authorized or Approved in the United States - FactSheet \(cdc.gov\)](#)
- 4. Medical Exemption Request Form: [Link to Medical Exemption Request Form](#)
- 5. Religious Exemption Request Form: [Link to Religious Exemption Request Form](#)
- 6. [Guidance for the Interim Final Rule - Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination\(cms.gov\)](#)

APPROVED BY: WSOT, COVID SWOT

CREATED DATE: 01/2022

REVIEW/REVISE DATES: 02/16/22

SEARCH KEYWORDS: MAP, COVID, COVID-19, Vaccine, Vaccination,

Attachment A

Staff Type	Current WellSpan Vaccination Requirement
WellSpan Employees	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Residents and Project Search Students	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Independent Credentialed Providers	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Students/Trainees	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Volunteers	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Staffing Agency staff	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.
Contracted staff	Both doses of the Pfizer or Moderna vaccine, or a single dose of a one-dose vaccine such as Johnson and Johnson.

Attachment B

Staff Type	Proof of Vaccination	Exemption Process	Enforcement	Contingency Plan
WellSpan Employees	Provided Documentation: *CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record	WellSpan Exemption Process, medical or religious, with documentation	Unpaid administrative leave for 7 calendar days, followed by termination	*Must complete weekly testing per policy
Residents and Project Search Students	Provided Documentation: *CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record	WellSpan Exemption Process, medical or religious, with documentation	Unpaid administrative leave for 7 calendar days, followed by termination	*Must complete weekly testing per policy
Independent Credentialed Providers/ Medical Staff	*CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record	Proof valid exemption, medical or religious, granted by employer or practice (not signed by Staff member) and attestation of Contingency Plan consistent with CMS requirements	Automatic or administrative suspension processes per Medical Staff Bylaws or other governance documents	Contingency Plan consistent with CMS requirements
Students/Trainees	*CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record OR *Attestation from college or program of above proof	Attestation with details of valid exemption, medical or religious, granted by college or program with Contingency Plan consistent with CMS requirements. Provide compliance support within 3 hours	Not permitted to participate in any educational or training programs at an Entity	Contingency Plan consistent with CMS requirements
Volunteers	*CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record	WellSpan Exemption Process, medical or religious, with documentation	Will not be permitted to volunteer at an Entity	*Must complete weekly testing per policy
Staffing Agency staff	*CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record	Attestation with details of valid exemption, medical or religious, granted by staffing agency with Contingency Plan consistent with CMS requirements. Provide compliance support within 3 hours.	Will not be permitted to provide services at an Entity	*Must complete weekly testing per policy
Contracted staff	*CDC COVID-19 vaccination card *Documentation from health care provider or EHR, or *State immunization system record OR *Attestation from vendor/organization providing service of above proof	Attestation with details of valid exemption, medical or religious, granted by vendor/organization with Contingency Plan consistent with CMS requirements. Provide compliance support within 3 hours.	Will not be permitted to provide services at an Entity	Contingency Plan consistent with CMS requirements