
AGENCY COVID-19 VACCINATION PROGRAM

Addendum No. 9-001.C

PURPOSE

To help protect staff, providers, patients, participants, residents, and visitors of TRU Community Care from acquiring the COVID-19 disease and to help prevent the unnecessary spread of the virus. Vaccine programs are an essential part of infection prevention and control for slowing or stopping the transmission of COVID-19 from adversely affecting those individuals who are most susceptible. This is accomplished through the requirement that all healthcare workers receive annual COVID-19 vaccination unless the individual has a valid exemption. (Note: Refer to Colorado Department of Public Health and Environment regulations (6 CCR 1011-1 (the "Rules"))).

Definitions

The following definitions describe terms used by TRU Community Care throughout this section.

1. **Common Areas**: those areas that are commonly used by patients and visitors, including but not limited to patient rooms, hallways of the Care Center and PACE sites, waiting areas, and areas where patients receive treatment and therapies.
2. **Employee**: any person who performs a service for wages or other remuneration for a licensed healthcare entity.
3. **Healthcare Worker (or Healthcare Personnel)**: any person working in a healthcare entity who has the potential to expose patients, residents, or consumers of the healthcare entity to COVID-19 virus. The following are considered healthcare workers and are required to obtain the COVID-19 vaccination:
 - A. All full-time, part-time or PRN persons employed by TRU Community Care, whether or not they have direct contact with patients or visitors.
 - B. All licensed independent practitioners (MD, DO, physicians assistants and advanced practice nurses) with medical staff privileges who are practicing at this agency.
 - C. All individuals who are performing work at this agency and who have a contract directly with this facility (such as contracted travel nurses).
4. **Non-Healthcare Workers**: The following are considered healthcare workers for whom COVID-19 vaccine is required
 - A. Individuals who are not employees of this agency but who are employed by agencies to perform work in the facility, including those from staffing agencies.
 - B. All persons who serve as volunteers at this agency.

6. Proof of Immunization: A written statement from a healthcare provider who has administered a COVID-19 vaccine to a healthcare worker, specifying the vaccine administered and the date it was administered. For CDPHE purposes, proof may also be demonstrated via electronic entry into the Colorado Immunization Information System (CIIS). See, 6 CCR 1011-1).
7. Medical Exemption: An exemption to the COVID-19 vaccine based on medical contraindication as verified in writing from a physician, physician's assistant, advanced practice nurse or nurse midwife licensed in the State of Colorado.
8. Volunteer: A person who provides services without wages or other remuneration.

POLICY

It is the policy of TRU Community Care that all employees receive the COVID-19 vaccination unless there is an approved medical or religious exemption. All employees are required to receive a COVID-19 vaccination as determined by Colorado Department of Public Health and Environment emergency rule 6 CCR 1011-1, unless a reasonable accommodation is approved. Employees not in compliance with this policy will be placed on unpaid leave until their employment status is determined.

Reasonable Accommodation

Employees in need of an exemption from this policy due to a medical reason, or because of a sincerely held religious belief must submit a completed request for religious exemption / accommodation or a request for medical exemption form to the Human Resources department to begin the interactive accommodation process within the communicated timelines established by TRU, or prior to their start of employment with the company. Exemption requests will be reviewed on a case-by-case basis and granted only if the accommodation does not cause TRU undue hardship or pose a direct threat to the health and safety of others. If an exemption is issued based on medical or religious accommodation, TRU reserves the right to request periodic review of the exemption which may lead to cancellation of the exemption based on business need, changes in the pandemic vaccine requirements or other reasons.

PROCEDURES

1. All employees will be paid for time taken to receive vaccinations. For offsite vaccinations, employees are required to work with their managers to schedule appropriate time to comply with this policy.
2. Before the stated deadlines to be vaccinated have expired, employees will be required to provide either proof of vaccination or an approved reasonable accommodation to be exempted from the requirements.
3. TRU requires all employees to obtain and maintain up to date COVID-19 vaccinations, including boosters if mandated.
4. TRU believes this is an important measure to protect the health and safety of employees, customers, clients, family members, and those who visit the workplace from COVID-19 infection.
5. All employees must maintain and provide written proof to the Human Resources department that they have been fully vaccinated against COVID-19 as per State and Federal guidelines.

6. New hires must present proof of COVID-19 vaccination or request a religious or medical exemption upon acceptance of the job offer as part of the pre-hire process.

Medical Exemptions:

A medical exemption may be obtained by completing the TRU Medical Exemption for COVID-19 Vaccine form.

1. The information derived from the medical accommodation form will be used by TRU to engage in an interactive process to determine eligibility for such exemption/accommodation and if the accommodation is reasonable and does not pose an undue hardship to the company.
2. If a medical exemption is obtained, the employee
 - a. Must wear appropriate personal protective equipment to include at a minimum a surgical mask when in direct contact with patients and while in common areas of facilities worked. TRU will provide the necessary masks.
 - b. the employee will submit to required weekly COVID-19 testing to ensure the employee has not contracted the virus.
 - c. the employee may be subject to location specific requirements for COVID testing.

Failure to comply with wearing a surgical/procedure mask and other PPE as required during direct patient care and while in a common area, will lead to disciplinary action.

See TRU COVID tier protocol for additional guidance on compliance.

Religious Exemptions:

A religious exemption may be requested by completing the TRU Request for Religious Accommodation Form

1. The information derived from the religious accommodation form will be used by TRU to engage in an interactive process to determine eligibility for such exemption/accommodation and if the accommodation is reasonable and does not pose an undue hardship to the company.
2. If an individual refuses to provide such information, such refusal may impact the Company's ability to adequately understand the covered individual's request or effectively engage in the interactive process to identify possible accommodations.

Any questions regarding this policy may be directed by contacting your Director, Human Resources, or any member of the Executive Team.

###End of Policy ###