

Arizona Department of Veterans' Services

Procedures for Vaccination Status Verification/ Mitigation/ Reasonable Accommodations/ Exemptions (medical, delayed vaccination and religious)

These procedures are subject to change at any time

- I. Vaccination Status Verification
 - a. Facility Staff: must present COVID-19 Immunization Record Card to the Infection Preventionist
 - i. Vaccination logs must be retained/ maintained by the facility in a secure location
 - ii. Physical copies of the staff COVID-19 Immunization Card or HR's approval letter for exemptions with the approved COVID-19 mitigation strategy are retained/ maintained by the Infection Preventionist
 - iii. Staff will utilize the vaccination logs to update and maintain National Health Safety Network (NHSN) database
 - b. Volunteers/ Contracted Services/ Students/ Interns/ Trainees: must present COVID-19 Immunization Record Card to the Infection Preventionist
 - i. Vaccination logs must be retained/ maintained by the facility in a secure location
 - ii. Physical copies of the COVID-19 Immunization Card or approved exemptions with the approved COVID-19 mitigation strategy are retained/maintained by the Infection Preventionist
 - iii. Staff will utilize the vaccination logs to update and maintain the NHSN database
 - c. Non-Facility ADVS staff
 - i. Physical copies of COVID-19 Immunization Cards or approved exemptions will be retained by Human Resources at the headquarters office in a secure location
 - ii. HR will provide the State Veteran Home Administrators with the data so that they are able to update their vaccination spreadsheet
 - iii. Staff will utilize the vaccination logs to update and maintain the NHSN database
- II. Vaccination Status
 - a. The Infection Preventionist is responsible for logging all entries pertaining to vaccination status (to include boosters), exemption, or delayed vaccination into a spreadsheet for tracking purposes
 - b. The Infection Preventionist will audit the spreadsheet weekly to ensure that staff/ trainees/ interns/ volunteers and contractors receive immunizations timely.
 - c. The Infection Preventionist will notify the Administrator of the Home when individuals are not compliant with immunization dates
 - d. ADVS staff that are not assigned to an Arizona State Veteran Home, but may visit the Veteran Home will provide their vaccination card to Human Resources located at headquarters. HR will transmit this data to the respective Infection Preventionist(s) to update their Vaccination Spreadsheet.
- III. Mitigation (delayed vaccination, pending exemption and exempted)

- a. Upon arrival at a facility, all persons will be instructed to wash their hands or use approved CDC hand sanitizer, get their temperature taken and answer the questions on the “Preventing COVID-19 Screening Checklist”
 - b. The facility will require utilization of a NIOSH approved N95 for source control as well as a face shield when in the facility when the county community transmission rate is 10% or higher. This requirement applies regardless of whether the staff is providing direct patient care or otherwise interacting with patients
 - i. The facility will require the utilization of a KN95 for vaccinated staff when the county community transmission rate falls below 10% (no face shield required)
 - ii. The facility will require the utilization of a NIOSH approved N95 for unvaccinated staff (regardless of exemption status) when the county community transmission rate falls below 10% (no face shields required)
 - c. Perform testing twice weekly utilizing either the polymerase chain reaction (PCR) or antigen testing methods
 - d. Staff will perform hand hygiene frequently, including before and after all resident contact, contact with potentially infectious material and before putting on and upon removal of personal protective equipment to include gloves
 - e. Hand hygiene in healthcare setting will be performed by washing with soap and water or using alcohol-based hand rubs. If hands are visibly soiled, soap and water, not alcohol-based hand rubs, will be used
 - f. Supplies for performing hand hygiene are available throughout each facility
- IV. Reasonable Accommodations for ADVS employees
- a. Employees may request a reasonable accommodation for medical or religious reasons by completing the “Request for Accommodation/ Exemption from Staff COVID-19 Vaccination Requirements” form.
 - b. Completed forms and any supporting documentation are to be submitted to humanresources@azdvs.gov
 - c. ADVS Human Resources notifies relevant ASVH Administrator of receipt of request.
 - d. ADVS/ ADOA Human Resources reviews the forms and documents for completion, and assesses the request based on CMS Rule requirements for medical exemptions and EEOC guidance for religious accommodations (<https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination>).
 - e. ADVS Human Resources informs the employee of the approval or denial of the request
 - f. ADVS Human Resources informs the relevant ASVH Administrator of the approval or denial of the request
- V. Reasonable Accommodations for Contractors, Volunteers, Interns, Students and Trainees
- a. Contractors, Volunteers, Interns, Students and Trainees may request a reasonable accommodation for medical or religious reasons by completing the “Request for Accommodation/ Exemption from COVID-19 Vaccination Requirements”
 - b. Completed forms and supporting documentation are submitted to the Administrator of the respective Veteran Home
 - c. ADVS Administrators will notify the Deputy Director that a request has been received

- d. The Administrator and Director of Nursing (DON) will review the forms and documents for completion, and assess the request based on CMS Rule requirements for medical exemptions and EEOC guidance for religious accommodations (<https://www.eeoc.gov/laws/guidance/section-12-religious-discrimination>).
 - e. ADVS Administrator informs the individual of the approval or denial of the request
 - f. ADVS Administrator informs the Infection Preventionist of the status of the individual to update their tracking spreadsheet.
- VI. Approved Exemptions
- a. As exemptions are approved, they will be communicated to the Infection Preventionist or a designee. The Infection Preventionist will input the exemption information into a spreadsheet that will serve as a tracking tool. Fully processed forms and all supporting documents will be placed in the employee's official medical/ benefits file secured by ADVS Human Resources. Non-employees' documentation will be securely stored by the ASVH Administrator
- VII. Medical Exemptions for ADVS Staff
- a. During the process of reviewing completion of "Request for Accommodation/ Exemption from Staff COVID-19 Vaccination Requirements" forms and prior to approving any employee requests for medical exemption, ADVS Human Resources will ensure that all of the following requirements are met:
 - i. Licensed practitioner is other than the employee requesting exemption
 - ii. Scope of practice of licensed practitioner is relevant
 - iii. Statement by licensed practitioner indicating which of the authorized COVID-19 vaccines are clinically contraindicated for the employee to receive
 - iv. Statement by the licensed practitioner indicating clinical reasons for the contraindications
 - v. Statement by the authenticating licensed practitioner recommending exemption
 - vi. Dated signature of the authenticating licensed practitioner
 - vii. Fully processed forms and all supporting documents will be placed in the employee's official medical/ benefits file secured by ADVS Human Resources. A copy of documents will also be secured in the local ADVS Human Resources office at the relevant facility.
- VIII. Medical Exemptions for Contractors, Volunteers, Students and Trainees
- a. During the process of reviewing completion of "Request for Accommodation/ Exemption from COVID-19 Vaccination Requirements" forms and prior to approving any employee requests for medical exemption, the Veteran Home Administrator and DON will ensure that all of the following requirements are met:
 - i. Licensed practitioner is other than the employee requesting exemption
 - ii. Scope of practice of licensed practitioner is relevant
 - iii. Statement by licensed practitioner indicating which of the authorized COVID-19 vaccines are clinically contraindicated for the employee to receive
 - iv. Statement by the licensed practitioner indicating clinical reasons for the contraindications

- v. Statement by the authenticating licensed practitioner recommending exemption
 - vi. Dated signature of the authenticating licensed practitioner
 - vii. Fully processed forms and all supporting documents will be placed in a secured file by the ADVS Administrator.
- IX. Temporarily Delayed Vaccination
- a. Per CDC guidance people who should wait to get vaccinated are as follows:
 - i. People with known current COVID-19 should defer vaccination at least until recovery from acute illness (if symptoms were present) has been achieved and criteria to discontinue isolation have been met
 - ii. People treated for COVID-19 with monoclonal antibodies or convalescent plasma while sick with COVID-19 should wait 90 days before getting a COVID-19 vaccine
 - iii. People treated with monoclonal antibodies or convalescent plasma after they were exposed to someone with COVID-19 to prevent themselves from becoming sick should wait 30 days before getting a COVID-19 vaccine
 - iv. If the person or their child have a history of multi-system inflammatory syndrome in adults or children (MIS-A or MIS-C), that person should consider delaying vaccination until after recovering from being sick and for 90 days after the date of diagnosis
- X. Contingency Plan for ADVS Facility Employees
- a. Employees that refuse to be vaccinated or complete an exemption request will be referred to Human Resources to discuss possible options, this could include reassignment to a non-direct care role within the facility
- XI. Contingency Plan for ADVS Non-Facility Employees
- a. Division Assistant Deputy Directors will identify employees within their division that meet CMS requirements for entrance into a State Veteran Home to conduct official business.
 - i. They will only utilize those employees to conduct official business in the State Veteran Home (i.e. procurement, information technology, public and intergovernmental affairs, risk/ loss, asset management, etc...)
 - ii. When practical, non-facility staff are encouraged to use internet based solutions (such as Google Meets) to conduct official business to prevent the need for accessing the facility
- XII. Contingency Plan for Contractors, Volunteers, Students and Trainees
- a. Contractors, Volunteers, Students and Trainees that refuse to be vaccinated or complete an exemption request will not be granted access into a State Veteran Home
 - i. This would not apply if a contractor or outside agency needs immediate access for emergent purposes (fire, rescue, emergency repair, health emergency etc...)
 - ii. If possible the Administrator would request vaccination documentation, but not at the detriment to the emergent need being addressed
 - b. Contractors, Volunteers, Students and Trainees will not be allowed to enter the facility until such time that there is evidence that they have received their first vaccination, or have been granted an approved exemption

- c. Contractors, Volunteers, Students and Trainees are subject to the mitigation procedures outlined herein until such time that they have evidenced being fully vaccinated, however:
 - i. There may be instances when individuals working for contracted services are not vaccinated and are unable to adhere to the mitigation strategies outlined herein due to the nature of the work being completed. For instance, a state contracted repair company has to work in the ceiling of a facility during the summer to repair air conditioning and it is not practical to wear a N95 and face shield
 - ii. In such circumstances, the situation will be discussed with the Administrator, DON and contracted services to create a mitigation strategy that minimizes infection risk but allows necessary work to be completed. For example, the Administrator may require the contractor to test for COVID-19 every day they intend to complete work in the facility
 - iii. The Administrator will retain approved exemptions to mitigation procedures for contractors. The Administrator will inform the Infection Preventionist to ensure the tracking spreadsheet is updated