



Partners in Comprehensive Care

POLICY NAME:	COVID-19 VACCINE & DIAGNOSTIC TESTING				
POLICY #:	P.STAFF.63				
IMPLEMENTATION DATE:	3/1/2021	LAST REVIEWED/UPDATE DATE:		8/17/2021	
POLICY OWNER:	QUALITY & COMPLIANCE				
APPROVED BY:	LEADERSHIP TEAM (LT)				
POLICY FOR:	Staff: <input checked="" type="checkbox"/>	Managers: <input checked="" type="checkbox"/>	Providers: <input checked="" type="checkbox"/>	Shareholders: <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/> Other:

**I. PURPOSE:** To outline vaccination requirements for all Epic Care Providers, Employees, Consultants, Independent Contractors, Externs, Locums, volunteers and other representatives not directly employed by Epic Care. To provide in-house testing venues to Epic Care Providers, Staff and Patients.

**II. SCOPE:** All Epic Care Providers, Employees, Consultants, Independent Contractors, Externs, Locums, volunteers and other representatives not directly employed by Epic Care Providers, including employees conducting COVID-19 Testing and disinfecting areas in which testing occurs.

**III. DEFINITIONS**

1. **Diagnostic Test:** A molecular (RT-PCR) test or antigen test.
2. **Viral Testing:** Viral (nucleic acid or antigen) tests check samples from the respiratory system (such as nasal or oral swabs, or saliva) to determine whether an infection with SARS-CoV-2, the virus that causes COVID-19 is present.
3. **Religious beliefs:** a sincerely held religious belief, practices (e.g prayer or meditation) or engagement with religious community members.
4. **Qualified Medical Reason:** a statement from a Provider indicating the probable duration of the inability to receive the vaccine but not describing the underlying medical condition or disability.

**IV. PROCEDURE**

**A. COVID-19 Vaccine – General Considerations**

1. Vaccinations have been available in California since December 2020. Currently, there are three (3) COVID-19 vaccines approved in the United States by the Food and Drug Administration (FDA) under an Emergency Use Authorization (EUA):
  - a) Janssen COVID-19 Vaccine (Johnson & Johnson): Only one (1) dose of the Janssen COVID-19 Vaccine is necessary.
  - b) Moderna: authorized and recommended for people >18 years of age and older. Two (2) doses are necessary, with the second dose to be received no earlier than 28 days from the first
  - c) Pfizer-BioNTech: Two (2) doses have been approved to be administered to persons >12 y/o. The second dose should be provided 3-6 weeks after the first dose.
2. Under State Public Health Officer Order of August 5, 2021, all healthcare workers in California must be fully vaccinated against COVID-19 by September 30, 2021, unless proof of medical or religious or a qualified medical reason exemption is presented to the employer.
3. Third shots (boosters) as applicable, may be required.
4. Exemption requests based on personal preference not to receive a vaccine will not be accepted.
5. The COVID-19 Vaccination sections of this policy apply to all Epic Care clinical and administrative personnel.

## **B. COVID-19 Vaccination Requirements**

1. All Epic Care Epic Care Providers, Employees, Consultants, Independent Contractors, Externs, and volunteers must provide one of the following to Human Resources upon date of hire, and/or by September 30, 2021:
  - a. A completed COVID-19 vaccine card; or
  - b. A request for religious exemption, or
  - c. A request for medical exemption.
2. A COVID-19 Vaccination Card will be considered as completed, if it outlines the following:
  - a. Full name and date of birth,
  - b. Vaccine manufacturer; and
  - c. Date of vaccine administration (for first dose and, if applicable, second dose or booster).

## **C. COVID-19 Vaccination Exemptions**

1. If a Religious exemption is applicable, the following must be completed and submitted to HR:
  - a. A signed COVID-19 Vaccination Declination Form stating the reason for declination is a sincerely-held religious belief,
  - b. A completed Religious Exemption Form.
2. If a Qualifying Medical Reason(s) exemption is applicable, the following must be completed and submitted to HR:
  - a. A written statement duly signed by a Physician, Nurse Practitioner or other licensed medical professional practicing under the license of a Physician.

Note: The statement should not describe the underlying medical condition or disability but must indicate the probable duration of your inability to receive the vaccine (e.g. 3 months, unknown, permanent).

- b. A Declination Form duly completed and signed.
3. If you meet any of the exemptions outlined above, in addition to submission of the documentation, Epic Care requires all unvaccinated exempt Providers, Employees, Consultants, Independent Contractors, Externs, and volunteers to:
  - a. Undergo COVID-19 PCR or antigen testing weekly, and
  - b. Wear a surgical mask or higher-level respirator approved by the National Institute of Occupational Safety and Health (NIOSH), such as an N95 filtering face piece respirator, at all times while at an Epic Care site.
4. Epic Care will make reasonable accommodations based on requests for medical and religious accommodations and engage in an information sharing interactive process with the employee, his or her health care provider or religious leader, to learn more about the nature of the disability or religious belief and the limitations on receiving an employer-required vaccination.
5. Epic Care Providers, Employees, Consultants, Independent Contractors, Externs, and volunteers who fail to provide the COVID-19 proof of vaccine or fail to qualify for a medical or religious exemption by September 30, 2021, will be terminated with cause.

## **D. COVID-19 Test – General Considerations**

1. Per the Centers for Disease Control and Prevention (CDC) guidance, Healthcare Workers, must undergo COVID-19 viral testing in the event that he or she is exhibiting symptoms of the virus, or are confirmed to have had direct contact with someone who is COVID-19 positive during their infectious period.

2. Per State Public Health Officer Order of August 5, 2021 of the California Department of Public Health (CDPH), unvaccinated healthcare workers who meet the requirements of a medical or religious exemption must be tested weekly.
3. Exposed and/or symptomatic Epic Care Providers and Staff who have received the COVID-19 vaccine are required to be tested as the risk remains that COVID-19 infection can occur in individuals who are vaccinated.
4. Epic Care Providers and Staff are not obligated to be tested for COVID-19 at an Epic Care facility, and may instead be tested through another testing center, his or her Primary Care Provider, or a County provided service.
5. Second hand exposures that do not meet the criteria above will not be eligible to obtain testing at an Epic Care site, but may do so at their own convenience through a separate testing facility.
6. To prevent further spread, and to protect the health and safety of patients and Staff, Epic Care does **not allow** into our facilities a Patient, Provider or Employee who is known be COVID-19 positive.
7. Samples will be obtained via direct nasal swabs.

#### E. COVID-19 Testing Criteria

1. **Epic Care Providers and Employees:** Epic Care Providers and Employees may undergo diagnostic testing at an Epic Care site, given resources are readily available, **if they meet the standards** described below:
  - a. Have signs or symptoms of COVID-19; and/or
  - b. Are asymptomatic with known or suspected exposure to a COVID-19 case during their infectious period; and/or
  - c. Have been present at a Site that meets the OSHA and County definition of a COVID-19 outbreak; and/or
  - d. Have been diagnosed with SARS-CoV-2 infection to determine if they are no longer infectious; and/or
  - e. Are unvaccinated due to meeting an exemption, in which case, weekly testing is required.
  - f. Epic Care Providers and Employees who have been advised to seek testing by the Safety Specialist.
  - g. Epic Care follows CDC testing requirements related to travel for returning to work.
2. **Epic Care Providers & Employees – Testing Frequency**
  - a. Employees conducting testing/obtaining samples will be tested on a weekly basis, regardless of COVID-19 vaccination status, symptoms or exposure.
  - b. Employees conducting testing/obtaining samples may not need to be tested **IF** they did not collect any samples that week, unless they meet one or more of the conditions listed in section B, 1 above.
  - c. Asymptomatic unvaccinated Employees working fully or partially remote are required to be tested weekly. A negative test result is required prior to accessing the premises.
  - d. Asymptomatic fully vaccinated employees are not required to be tested.
3. **Epic Care Patients**
  - a. Non-vaccinated Epic Care patients receiving radiation treatment are required to undergo COVID-19 testing ideally within 72 hours prior to CT simulations.
  - b. Non-vaccinated Epic Care patients with a cancer treatment plan must undergo COVID-19 testing ideally within 72 hours prior to initiating chemotherapy, immunotherapy or biotherapy treatment.
  - c. Only qualifying Epic Care Providers/Staff may enter a COVID-19 test order in the Electronic Medical Record (EMR).

- d. Patients who are scheduled for a hospital procedure or surgery will be tested within 72 hours of hospital procedure or surgery, subject to Hospital's policies.
- e. Positive and negative testing results will be shared and monitored according to service line protocols.
- f. Symptomatic patients who meet the criteria outlined in this section, who have received the COVID-19 vaccine are required to be tested as the risk remains that COVID-19 infection can occur in individuals who are vaccinated.

#### **F. COVID-19 Testing – Non-Compliance Accountability**

1. Epic Care Providers and Employees who refuse to comply with mandatory COVID-19 testing shall not be permitted to enter any Epic Care Sites (Facilities?), may be suspended without pay until they comply with this policy, and/or may be subject to progressive discipline, including termination.
2. Epic Care Providers and Employees who refuse to comply with mandatory COVID-19 testing, must provide the HR department with proof of a medical or religious exception **or** COVID-19 vaccination records.
3. Misrepresentations about vaccination status will be addressed consistently and thoughtfully via corrective action, unpaid suspension or termination of employment.
4. With the support of the HR Department, Supervisors will notify the employee of the timeframe allowed to comply with this policy.

#### **G. COVID-19 Testing Appointments**

1. For testing to be conducted at Epic Care, Epic Care Providers and Employees must work with their direct report and/or Practice Manager to schedule a COVID-19 testing appointment, based on symptoms and/or required testing frequency.
2. Supervisors must contact the Safety & Compliance Specialist who will partner with the Practice Manager of the Epic Care testing center to schedule an appointment of symptomatic or exposed individuals.
3. Supervisors will provide appointment time and location to the employee and ask them to go home after the specimen has been collected and until test results are obtained.
4. Epic Care COVID-19 Testing location(s) and times are subject to change based on testing kits and staffing availability.
5. Testing appointments for patients will be arranged by the scheduler upon receipt of a Physician's order.

#### **H. COVID-19 Employee Test Results**

To ensure that test results are communicated effectively, test results (positive or negative) will be conveyed to appropriate parties, as follows:

1. Once a specimen has been collected, test results will be sent to the individual within 24 hours.
2. Test results will be emailed to Epic Care's Human Resources department, as well as the Safety Specialist, and County Health Department – as required by federal law.
3. Next steps will be provided to the individual by the Safety & Compliance Specialist.

#### **I. Data Reporting**

1. Epic Care is required by State and Federal Law to report COVID-19 results, regardless of whether the individual tests positive or negative. In order to meet the regulatory reporting requirements, Epic Care will automatically report COVID-19 test results to public health authorities within 24 hours via the AIMS platform. Data includes:
  - a. Ordering Physician
  - b. Order information
  - c. Individual demographics

- d. Test results
2. Epic Care must maintain records of Employees vaccination or exemption status, which must be provided to the local or state Public Health Officer or their designee upon request, no later than the next business day after receiving the request.

## **J. Specimen Collection & Handling**

### **1. Specimen Integrity**

- a. Use freshly collected specimens for optimal test performance; an inadequate specimen collection or improper sample handling may yield erroneous results.
- b. Follow Standard Precautions when handling clinical specimens, all of which may contain potentially infectious materials. Standard Precautions include hand hygiene and the use of personal protective equipment (PPE), such as laboratory coats or gowns, gloves, and eye protection.
- c. To minimize the risk of contamination of PPE and swab packaging during sample collection, it is recommended to widely open the package by pulling from the top down. Carefully remove the swab and perform sample collection.

### **2. Specimen Collection – Nasal Swab**

- a. For optimal test performance, use the swabs provided in the test kit.
- b. To collect a nasal swab sample, carefully insert the swab into the nostril exhibiting the most visible drainage, or the nostril that is most congested if drainage is not visible.
- c. Using gentle rotation, push the swab until resistance is met at the level of the turbinates (less than one inch into the nostril).
- d. Rotate the swab several times against the nasal wall then slowly remove from the nostril. Using the same swab, repeat sample collection in the other nostril.

### **3. Specimen Processing**

- a. For best performance, direct nasal swab should be tested as soon as possible after collection.
- b. If immediate testing is not possible, and to maintain best performance, the swab should be placed in a clean, unused tube labeled with the individual's information, and capped tightly at room temperature (15-30°C) for up to one (1) hour prior to testing.
- c. Ensure the swab fits securely within the tube and the cap is tightly closed. If greater than one (1) hour delay occurs, dispose of sample; a new sample must be collected for testing.

## **K. Waste Management**

Handle laboratory waste generated during testing for COVID-19 as all other biohazardous waste.

## **L. TRAINING**

Epic Care Providers and/or Employees conducting testing must complete the following trainings before undertaking the task:

1. HIPAA Privacy and Security Training - Refresher
2. Safety Training - Refresher
3. ID NOW COVID-19 Quality Control SOP – Review
4. ID NOW COVID-19 Testing SOP – Review
5. Any training that Epic Care and/or regulatory agencies may deem necessary

## **M. RECORDKEEPING**

1. The Human Resources Department will keep records of the following:

- a. Test results
2. Vaccine records, including full name and date of birth; vaccine manufacturer and date of vaccine administration (for first dose and, if applicable, second dose).
3. COVID-19 Vaccination Declination form
4. Health care provider's statement for medical exemption - as applicable
5. Religious Exemption form -as applicable

**N. RELATED DOCUMENTS AND RESOURCES**

1. Infectious Disease Management Policy
2. Protective Personal Equipment (PPE) Policy
3. Hand Hygiene Policy
4. Social Distancing Protocol
5. Exposure Control Plan for Bloodborne Pathogens Policy
6. Epic Care Injury Illness Prevention Program (IIPP)
7. Sharps Safety Policy
8. Epic Care HIPAA Privacy & Security Guidelines
9. Incident Reporting Policy
10. Incident Reporting Form
11. COVID-19 Patient Screening SOP
12. Quality Control SOP
13. COVID-19 Testing SOP
14. COVID-19 Return to Epic Care Criteria Tip Sheet
15. Epic Care Religious Exemption Form
16. Epic Care COVID-19 Vaccination Declination Form