

VACCINATE with CONFIDENCE

TIPS TO IMPLEMENT EMPLOYEE VACCINE MANDATES AT COMMUNITY HEALTH CENTERS

Protect your CHC Community & Stop Myths

Vaccines protect patients and your community from preventable hospitalization and serious illness from COVID-19 and new variants.

- **Ensure vaccines** are available, affordable, and easy to get.
- **Acknowledge concerns and aim to diffuse myths.**
Leverage localized data to talk with employees about the ways FDA approved vaccines reduce the spread of disease, hospitalization, and death in your community, save costs, and reduce employee burnout.
 - [Key things to Know About COVID-19 Vaccines](#) | CDC
 - [COVID-19 vaccine myths, debunked](#) | Mayo Clinic

Establish Policy & Procedures

Board approved policies and associated procedures for employee vaccine mandates can be clear, concise, and easy to follow.

EXAMPLES:

POLICY: Mandatory immunization at *[health center name]* is effective, reasonable, and legally required to create an environment that protects patients, employees, and the community from severe illness, hospitalization, and death due to COVID-19.

PROCEDURE: COVID-19 vaccines will be available free of charge to all employees. Proof of vaccination by a third party must be provided to *[employee title]* of *[health center name]* by *[date range]*. It must include record of vaccine, dates administered, the lot number, and location. *[health center name]* employees are also expected to comply with safety requirements as indicated by *[health center name]* management and CDC guidelines including the use of personal protective equipment (PPE).

Find more detailed health center samples linked here:*

- Delta Health Center, Inc. (MS) | [Policy on Employee Mandatory COVID-19 Vaccine](#)
- Family Health Care Clinic, Inc. (MS) | [COVID-19 Mandatory Vaccine Policy](#)
- Eagle View Community Health Systems, Inc. (IL) | [COVID and Influenza Policy](#)
- HealthLinc (IN) | [Employee Immunization Policy](#) and [FAQs on COVID-19 Vaccination as a Condition of Employment](#)
- Yakima Neighborhood Health Services (WA) | [COVID-19 Vaccine for Employees](#)—this sample includes targeted data and recommended actions for exemptions.
- G.A. Carmichael Family Health Center, Inc. (MS) | [Policy](#)

**Thank you to the health centers with Policy and Procedures listed here. These organizations offered their information to assist other health centers.*

Recognize Exemptions

With vaccine mandates, reasonable exemptions are approved under the Americans with Disabilities Act (ADA) and the Occupational Safety and Health Administration (OSHA). The Centers for Medicare & Medicaid Services (CMS) also offers specific guidance on exemptions. The U.S. Equal Employment Opportunity Commission (EEOC) posted FAQs to assist employers navigating COVID-19 vaccine related religious accommodation requests, with information on ADA and Title VII COVID-19 vaccine compliance.

- Exemptions are recognized for a limited and defined time period, for:
 - **Medical contraindications**—with “Request for Medical Exemption” form with medical provider’s signature and independent committee review
 - Sincerely held religious beliefs—with a “Request for Religious Exemption” form with verification and independent committee review
 - **How to Handle an Employee’s Request for Medical or Religious Accommodation to a Vaccine Requirement**
- Failure to comply with health center policy:
 - Results in employee termination. If you offer a time-period to comply, clearly define this in the signed policy and procedure document.
 - Some employers offer testing as an alternative to vaccinations, with procedures defined



Additional information to implement your Community Health Center’s Mandatory Employee COVID-19 Vaccination:

- Join NACHC’s Online Community “Coronavirus Info for Health Centers” for real-time peer discussion. Email trainings@nachc.org for access.
- Consult with your local General Counsel to ensure proper implementation of your policy.
- Consult with your State/Regional [Primary Care Association](#) (PCA).