

ADMINISTRATIVE POLICY
Lexington Medical Center

SUBJECT: COVID-19 Vaccination Requirements: NON-LMC STAFF

EFFECTIVE: 02/2022

REVIEWED: 01/2022

1. **Guidelines for NON-LMC STAFF that enter LMC facilities:**

1.1 **PURPOSE:**

Lexington Medical Center (LMC) wants to assure its patients, employees, staff, volunteers and vendors of its continued commitment to maintaining a safe and healthy workplace.

For purposes of this document, **NON-LMC STAFF** will be defined as: Vendor representatives, sales representatives, delivery personnel, contractors, repair personnel, independent medical staff, agency staff, and any other non-LMC representatives who have business or provide patient care, either under contract or not, at any Lexington Medical Center facility or has the potential to have contact with anyone at the site of care.

In compliance with the requirements issued by the federal government and the Centers for Medicare & Medicaid Services (CMS), LMC requires that all **NON-LMC STAFF** be

- (1) fully vaccinated against COVID-19¹ OR
- (2) be exempted from vaccination by their respective employer as a condition of physical access/entry to any LMC facility.

This policy is also based on guidance from the Centers for Disease Control and Prevention (CDC), the Equal Employment Opportunity Commission (EEOC), the South Carolina Department of Health and Environmental Control (SCDHEC), the Occupational Safety and Health Administration (OSHA), and the South Carolina Occupational Safety and Health Administration (SC OSHA). This policy is intended to comply with all applicable laws and will be adjusted from time to time to maintain compliance.

1.2 **STATEMENT OF COVID-19 VACCINATION REQUIREMENTS:**

To prevent the infection and spread of COVID-19, and as an integral part of LMC's health and safety measures, it is the policy of LMC to require that all **NON-LMC STAFF** become fully vaccinated against COVID-19 as a condition of access/entry to any LMC facility. **NON-LMC STAFF** who are not fully vaccinated, but have an exemption from their respective employer will also be allowed into LMC's facilities with the following stipulations:

¹ An individual is considered "fully vaccinated" two weeks after the second dose of a two-dose vaccine (Moderna or Pfizer) or two weeks after a single-dose vaccine (Johnson & Johnson). LMC reserves the right, in its sole and absolute discretion, to at any time update the definition of "fully vaccinated" within the meaning of this Policy. LMC strives to adhere to applicable public health guidance, which is evolving and continually updated and may result in modifications to this and other definitions herein. More information about COVID-19 vaccines and the vaccine approval process is available and frequently updated on the CDC's website at: <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/>.

- (1) The person with corporate authority at the company (or his/her designee) of the **NON-LMC STAFF**'s company has affirmed in writing, on company letterhead, that they have been provided an allowable exemption as detailed by "Interim final rule for Covid Vaccination Mandate" issued by CMS on November 5, 2021. (Attachment B - Sample Affidavit)
- (2) The exempted, but non-vaccinated **NON-LMC STAFF** member, will follow all the requirements of LMC including but not limited to the monitoring requirements of non-vaccinated LMC STAFF member as detailed in LMC HR Policy "LMC Mandatory COVID-19 Vaccination Policy"

1.3 **MANDATORY VACCINE REQUIREMENT – DATES & DEADLINES:**

All **NON-LMC STAFF** must receive their first dose of an approved vaccination for COVID-19 or submit an allowable exemption letter as detailed above no later than February 11, 2022. All **NON-LMC STAFF** must receive their second dose of an approved vaccination no later than March 15, 2022. Vaccine Boosters are strongly encouraged but are not currently required under this policy.

To gain entry to any LMC facility, all **NON-LMC STAFF** (other than independent medical staff) must obtain a new LMC ID badge no later than March 15, 2022. Between February 11, 2022 and March 14, 2022 all **NON-LMC STAFF** will be expected to show an alternate proof of being vaccinated for COVID-19 or allowable exemption letter. Failure to provide valid proof of vaccination or exemption will result in entry being denied. On and after March 15, 2022, **NON-LMC STAFF** will NOT be allowed entry to any LMC facility without the required, new ID badge.

Acceptable forms of proof of compliance include: 1) CDC COVID-19 vaccination record card (or legible photo of the card), 2) documentation of vaccination from a health care provider or electronic health record, 3) state immunization information system record, 4) allowable exemption letter on company letterhead.

1.4 **OBTAINING NEW ID BADGE:**

Instructions and details for complying with this policy and obtaining a new-design ID badge are included in "Attachment A" below.

1.5 **INDEPENDENT MEDICAL STAFF THAT ARE NOT EMPLOYED BY LMC:**

Medical staff members, other than LMC employees, will have their COVID-19 vaccination or exemption status verified and tracked by the Medical Staff office. All of the requirements in section 1.2 apply.

1.6 **EXCLUSIONS:**

Organ Procurement Service staff, Portable X-ray Suppliers, vendors accessing facilities less than once per quarter, first responders (non-contracted emergency medical services, and law enforcement, fire services) are specifically exempt from this vaccination requirements policy.

*Note- DNV requires their surveyors to be fully vaccinated.

Guests that are visiting patients are also exempt from this policy.

ATTACHMENT “A”

HOW TO OBTAIN A NEW ID BADGE



2720 Sunset Boulevard
West Columbia, S.C. 29169
(803) 791-2000

Because requirements may change over time, we have developed a web page with additional information we hope will be helpful to you. You can find all the details related to our **NON-LMC STAFF** and vaccination requirements at: www.lexmed.com/vaxbadge

WHAT THIS MEANS: The badging process will start with hospital Directors and Managers sending Public Safety their list of **NON-LMC STAFF** names and associated companies. This will authorize Public Safety to be prepared to create new ID badges for all **NON-LMC STAFF** who submit the required information.

Beginning Friday February 11, 2022 any **NON-LMC STAFF** interested in visiting any Lexington Medical Center facility must have proof of at least their first vaccination shot or an acceptable exemption letter. On this date and until Monday March 14th, **NON-LMC STAFF** will be required to show the new LMC ID badge or proof of vaccination/exemption to gain entry to any LMC facility.

Beginning Tuesday March 15th, all **NON-LMC STAFF** will be required to have the new-design LMC ID badge to gain entry to any LMC facility.

To pick up the new ID badge **NON-LMC STAFF** must visit the Public Safety Department located at 115 West Hospital Drive, West Columbia, SC 29169 - Phone 803-791-2917. Public Safety staff will issue the new ID badge as long as all requirements have been met.

VENDORMATE REQUIREMENTS: Any **NON-LMC STAFF** that currently utilize Vendormate will continue to utilize Vendormate. The new LMC ID badge only approves access to LMC buildings, it does not take the place of Vendormate.

We appreciate the role you and your organization play in our efforts to provide the best and safest care to our patients.

Feel free to contact Samantha Stallings via email at slingram@lexhealth.org or via phone at 803-936-7142 or your Lexington Medical Center representative with any questions or concerns about this new requirement.

ATTACHMENT “B”

ATTESTATION AFFIDAVIT

(Name of entity that provider works)

To LMC:

As (Name and Title of individual at entity, ie “President”), I understand that Lexington Medical Center participates in Medicare and Medicaid as well as other government payment systems which are governed by CMS and other entities and is required to comply with the “Interim final rule for Covid Vaccination Mandate” issued by CMS on November 5, 2021. Myself and all individuals of my organization understand this rule, among other things, requires all individuals who are present at, or on LMC’s facilities who provide direct patient care, treatment, or other services for the facility and/or its patients be vaccinated and comply with the CMS mandatory vaccination requirements.

As (Name and Title of individual at entity, ie “President”), I hereby affirm and attest (Company Name) has established the appropriate procedures and processes in accordance with State, Federal and local laws to comply with an appropriate evaluation and determination that the (Name(s) of Person Exempted) has met (Choose one, “the requirements for a medical exemption, under all applicable laws”, or the “requirements to qualify for a “Religious Exemption”” under Title VII of the Federal Civil Rights Act. I also affirm and attest that such individual(s) will comply with all requirements and obligations under LMC policies and procedures for personnel that are exempted from the Covid Vaccine now in place and subject subsequent to future changes at LMC’s direction. I also agree that (Company Name), at LMC’s request, may need to demonstrate evidence of policies and procedures and compliance with such and proof of compliance with such requirements under all applicable laws and regulations to LMC’s accrediting entities, government entities and regulatory entities as well as LMC. I also acknowledge and affirm that I will notify LMC immediately if an employee no longer qualifies for such exemption.

I attest that I have full authority to sign on behalf of the above-named organization.

Name: _____

Signature: _____

Title: _____