

Division of Licensing and Protection

HC 2 South, 280 State Drive

Waterbury VT 05671-2060

<http://www.dail.vermont.gov>

Survey and Certification Voice/TTY (802) 241-0480

Survey and Certification Fax (802) 241-0383

Survey and Certification Reporting Line: (888) 770-5330

To Report Adult Abuse: (800) 564-1612

May 20, 2022

Linda Rossi, President and Interim CEO
Brattleboro Retreat
Anna Marsh Lane
Po Box 803
Brattleboro, VT 05301-0803

Provider ID #:474001

Dear Ms. Rossi:

On **May 9, 2022**, a complaint investigation was completed at your facility which resulted in Standard Level Deficiencies. Subsequently, you submitted a plan of correction for that complaint investigation that was accepted on May 20, 2022.

Thank you for the Plan of Correction and it will be put in your facility file.

Sincerely,



Suzanne Leavitt, RN, MS
Assistant Division Director
Director State Survey Agency

Enclosure

DEPARTMENT OF HEALTH AND HUMAN SERVICES
CENTERS FOR MEDICARE & MEDICAID SERVICES

PRINTED: 05/09/2022
FORM APPROVED
OMB NO. 0938-0391

STATEMENT OF DEFICIENCIES AND PLAN OF CORRECTION		(X1) PROVIDER/SUPPLIER/CLIA IDENTIFICATION NUMBER: 474001	(X2) MULTIPLE CONSTRUCTION A. BUILDING _____ B. WING _____		(X3) DATE SURVEY COMPLETED C 05/09/2022
NAME OF PROVIDER OR SUPPLIER BRATTLEBORO RETREAT			STREET ADDRESS, CITY, STATE, ZIP CODE ANNA MARSH LANE PO BOX 803 BRATTLEBORO, VT 05301		
(X4) ID PREFIX TAG	SUMMARY STATEMENT OF DEFICIENCIES (EACH DEFICIENCY MUST BE PRECEDED BY FULL REGULATORY OR LSC IDENTIFYING INFORMATION)	ID PREFIX TAG	PROVIDER'S PLAN OF CORRECTION (EACH CORRECTIVE ACTION SHOULD BE CROSS-REFERENCED TO THE APPROPRIATE DEFICIENCY)	(X5) COMPLETION DATE	
A 000	INITIAL COMMENTS	A 000			
A 792	<p>COVID-19 Vaccination of Facility Staff CFR(s): 482.42 (g)(1)-(3)(i)-(x)</p> <p>§ 482.42 Condition of participation: Infection prevention and control and antibiotic stewardship programs. (g) Standard: COVID-19 Vaccination of hospital staff. The hospital must develop and implement policies and procedures to ensure that all staff are fully vaccinated for COVID-19. For purposes of this section, staff are considered fully vaccinated if it has been 2 weeks or more since they completed a primary vaccination series for COVID-19. The completion of a primary vaccination series for COVID-19 is defined here as the administration of a single-dose vaccine, or the administration of all required doses of a multi-dose vaccine. (1) Regardless of clinical responsibility or patient contact, the policies and procedures must apply to the following hospital staff, who provide any care, treatment, or other services for the hospital and/or its patients: (i) Hospital employees; (ii) Licensed practitioners; (iii) Students, trainees, and volunteers; and (iv) Individuals who provide care, treatment, or</p>	A 792	<p>Mandatory vaccination of all Brattleboro Retreat employees was achieved by October 18, 2021, with completion of either the initial series or an initial vaccination with the second vaccination in the primary series completed by December 30, 2021. This was a leadership decision and at the time there was no mandate to do so. IP policy and procedure is attached.</p> <p>See attached policy. All employees were required to be fully vaccinated and boosted by dates annotated above.</p> <p><i>POC accepted 5/20/22 D. W. Deane RN</i></p>		

LABORATORY DIRECTOR'S OR PROVIDER/SUPPLIER REPRESENTATIVE'S SIGNATURE
Katherine J. Kusni, MD CNO
TITLE
5/19/22 (X6) DATE

Any deficiency statement ending with an asterisk (*) denotes a deficiency which the institution may be excused from correcting providing it is determined that other safeguards provide sufficient protection to the patients. (See instructions.) Except for nursing homes, the findings stated above are disclosable 90 days following the date of survey whether or not a plan of correction is provided. For nursing homes, the above findings and plans of correction are disclosable 14 days following the date these documents are made available to the facility. If deficiencies are cited, an approved plan of correction is requisite to continued program participation.

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A 792	Continued From page 1 other services for the hospital and/or its patients, under contract or by other arrangement. (2) The policies and procedures of this section do not apply to the following hospital staff: (i) Staff who exclusively provide telehealth or telemedicine services outside of the hospital setting and who do not have any direct contact with patients and other staff specified in paragraph (g)(1) of this section; and (ii) Staff who provide support services for the hospital that are performed exclusively outside of the hospital setting and who do not have any direct contact with patients and other staff specified in paragraph (g)(1) of this section. (3) The policies and procedures must include, at a minimum, the following components: (i) A process for ensuring all staff specified in paragraph (g)(1) of this section (except for those staff who have pending requests for, or who have been granted, exemptions to the vaccination requirements of this section, or those staff for whom COVID-19 vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and considerations) have received, at a minimum, a single-dose COVID-19 vaccine, or the first dose of the primary vaccination series for a multi-dose COVID-19 vaccine prior to staff providing any care, treatment, or other services for the hospital and/or its patients; (ii) A process for ensuring the implementation of additional precautions, intended to mitigate the transmission and spread of COVID-19, for all staff who are not fully vaccinated for COVID-19; (iv) A process for tracking and securely documenting the COVID-19 vaccination status of all staff specified in paragraph (g)(1) of this section;	A 792	It was the decision of the Brattleboro Retreat to require all employees, regardless of physical location, to be vaccinated and boosted by December 30, 2021. All employees are annotated in the COVID-19 vaccination SmartSheet as to their dates of vaccination, boosters, decision to not vaccinate resulting in termination. <i>POC accepted 5/19/22 by [signature]</i>		

Katharine Bak MSW, RN

CNO 5/19/22

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A 792	Continued From page 2 (v) A process for tracking and securely documenting the COVID-19 vaccination status of any staff who have obtained any booster doses as recommended by the CDC; (vi) A process by which staff may request an exemption from the staff COVID-19 vaccination requirements based on an applicable Federal law; (vii) A process for tracking and securely documenting information provided by those staff who have requested, and for whom the hospital has granted, an exemption from the staff COVID-19 vaccination requirements; (viii) A process for ensuring that all documentation, which confirms recognized clinical contraindications to COVID-19 vaccines and which supports staff requests for medical exemptions from vaccination, has been signed and dated by a licensed practitioner, who is not the individual requesting the exemption, and who is acting within their respective scope of practice as defined by, and in accordance with, all applicable State and local laws, and for further ensuring that such documentation contains: (A) All information specifying which of the authorized COVID-19 vaccines are clinically contraindicated for the staff member to receive and the recognized clinical reasons for the contraindications; and (B) A statement by the authenticating practitioner recommending that the staff member be exempted from the hospital's COVID-19 vaccination requirements for staff based on the recognized clinical contraindications; (ix) A process for ensuring the tracking and secure documentation of the vaccination status of staff for whom COVID-19 vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and	A 792	HR defined the process and the documentation for request of an exemption was available through Employee Health. There was one medical exemption request, which was not supported by medical documentation, and therefore denied. There was/is a process for religious exemptions. <i>POC accepted 5/19/22 D. Wickham RN</i>	

Katharine Burkman, RN

CNO

5/19/22

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A 792	<p>Continued From page 3</p> <p>considerations, including, but not limited to, individuals with acute illness secondary to COVID-19, and individuals who received monoclonal antibodies or convalescent plasma for COVID-19 treatment; and</p> <p>(x) Contingency plans for staff who are not fully vaccinated for COVID-19.</p> <p>Effective 60 Days After Publication:</p> <p>(ii) A process for ensuring that all staff specified in paragraph (g)(1) of this section are fully vaccinated for COVID-19, except for those staff who have been granted exemptions to the vaccination requirements of this section, or those staff for whom COVID-19 vaccination must be temporarily delayed, as recommended by the CDC, due to clinical precautions and considerations;</p> <p>This STANDARD is not met as evidenced by: Based in interview and record review, the Facility failed to develop and implement policies and procedures to assure that all staff are fully vaccinated for COVID-19.</p> <p>Per record review on 4/14/22 and 4/15/22, the Facility had protocols for COVID-19 testing, the proper wearing of PPE, symptom monitoring, and an algorithm for monitoring staff after an exposure. There was no evidence that the Facility had a process to ensure additional precautions to mitigate the transmission and spread of COVID-19 for all staff who were not fully vaccinated; a process for tracking and securely documenting the COVID-19 vaccination status of all staff; A process for tracking and securely documenting the COVID-19 vaccination status of any staff who had obtained any booster doses; A process by which staff may request an exemption based on applicable Federal Law and</p>	A 792	<p>All staff were vaccinated by the end of December 2021. Process and procedures were in place that insured that our metric was met. Documentation (printout of our SmartSheet records) was supplied that had all of our vaccinations detailed.</p> <p>Additional precautions for those that may not be vaccinated are located in our policy on PPE requirements for outbreaks. Mitigation for prevention of spread of COVID 19 includes full PPE (N95 mask, face shield).</p> <p>Tracking of vaccination and booster doses are entered in the Covid 19 Vaccination Smart Sheet, along with the Initial doses. The SmartSheet is maintained on a secure web server.</p> <p>Employees immunization status will be verified through employee health upon hire and monthly surveillance of immunization status will be monitored through the infection prevention department; ongoing two point verification process.</p>		

Katharine Bk usar

CNO

5/19/22

*POC accepted 5/20/22
Davidawata RN*

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A 792	Continued From page 4 a way to track and securely document the information; a process that ensured documentation of medical exemptions were signed and dated by a licensed practitioner with the recognized clinical contraindications to COVID-19 vaccinations; a process for ensuring the tracking and secure documentation of the vaccination status of staff for whom a vaccination must be temporarily delayed; and contingency plans for staff who were not fully vaccinated for COVID-19. Per interview with the Director of Regulatory Affairs and Manager of Infection Prevention on 4/14/22 and 4/15/22, the Director stated that as they only hire fully vaccinated staff, S/he felt that the Facility did not need to develop a policy to ensure that all staff are fully vaccinated for COVID-19. The Director confirmed that they have no formal process for tracking staff immunizations, and that the process is handled informally between S/he and another administrator.	A 792	All employees and contracted service employees were vaccinated prior to this regulation being released in 2022; all new hires are required to be fully vaccinated prior to hire therefore no contingency plan is required for temporary delays. I respectfully request that the last sentence be redacted. We provided spreadsheets with our vaccinations and booster data. Staff requiring boosters are tracked through Employee Health and Infection Prevention; there is no other administrator. This is a formalized process. This has been a set process which has been in place since December 2020. COVID-19 Vaccination Policy and the COVID Vaccination Procedure Policy are attached. Corrective action completed 5/15/2022. <i>POC accepted 5/20/22 D.L. Chandra Rpt</i>	

Katherine Boyle on MSW

CNO

5/19/22

COVID-19 VACCINATION POLICY & PROCEDURES

Replaces:

Sections:	Infection Control, Employee Health Services, Human Resources	Date Last Reviewed	2022/05
Source:	Infection Control	Date Last Revised	2022/05
Stakeholder:	Infection Control	Replaces	New
Approval:	Administration	Date Last Approved	2022/05
	Patient Care Services	Date Last Approved	2022/05
	Medical Affairs	Date Last Approved	2022/05
			NEXT POLICY REVIEW 2025/05

PURPOSE:

The purpose of this policy is to protect patients, employees, family members and visitors from COVID-19 infection through a hospital-wide mandatory immunization program.

SCOPE:

This policy applies to all Health Care Personnel and Contracted Personnel ("Personnel") working, performing services, or participating in training programs at the Brattleboro Retreat.

DEFINITIONS:

There are two types of Personnel at the Retreat: Health Care Personnel and Contracted Personnel as defined below.

Health Care Personnel:

- Employees of the Brattleboro Retreat including those who work remotely;
- Medical Staff who work on-site in Brattleboro Retreat facilities;
- Residents, interns, clinical instructors, students or other individuals participating in training programs at the Brattleboro Retreat.

Contracted Personnel:

- Travelers and Locums who perform services on-site at the Brattleboro Retreat;
- Other contracted individuals such as interim personnel, consultants and vendors who perform services within a Brattleboro Retreat facility e.g. Sodexo.

POLICY:

COVID-19 Immunizations:

1. All Health Personnel and Contracted Personnel must be immunized against COVID-19 by October 18, 2021. This includes a two-dose immunization(s) and any subsequent immunizations that may be required by the organization to maintain protective immunity over time.

COVID-19 VACCINATION POLICY & PROCEDURES

2. COVID-19 vaccines are available free of charge to all Health Care Personnel and Contracted Personnel.
3. Healthcare Personnel and Contracted Personnel may receive a COVID-19 vaccination through Employee Health Services or an outside provider of their choice. Proof of vaccination may include a COVID-19 CDC Vaccination Card or confirmation through a local vaccine registry. For Health Care Personnel, proof of vaccination must be submitted to Employee Health Services via email at swillis@Brattlebororetreat.org or with Infection Control via bmacgregor@Brattlebororetreat.org.
4. The Brattleboro Retreat will rely on the employers of Contracted Personnel and the educational institutions of students to ensure their compliance with this policy and will request documentation from employers and educational institutions that all Health Care and Contracted Personnel have been fully vaccinated as of October 18, 2021.
5. All Health Care Personnel and Contracted Personnel, regardless of vaccination status, are required to strictly adhere to respiratory hygiene and hand hygiene practices as well as all recommended isolation precautions.
6. All Health Care Personnel and Contracted Personnel are required to report any COVID-19 exposures, perform symptom self-monitoring, present for testing if symptomatic, and follow quarantine recommendations in accordance with Brattleboro Retreat's COVID-19 exposure procedures. Personnel who do not feel well should communicate with Employee Health Services or Infection Control prior to reporting to work.
7. Health Care Personnel and Contracted Personnel granted a vaccine exemption as described below, are required to adhere to appropriate infection control measures to protect others.

PROCEDURES:

- A. The Brattleboro Retreat will maintain records to track compliance with COVID-19 immunization requirements. This may be done through Infection Prevention, Employee Health Services, or other means as appropriate based on the category of Health Care Personnel and Contracted Personnel. Health Care Personnel and Contracted Personnel must adhere to this policy as a condition of employment or contractual engagement.
- B. Employed Health Care Personnel who are not either fully vaccinated or approved for a vaccine exemption in accordance with this policy by October 18, 2021, will be officially notified of their non-vaccinated status, will be placed on administrative leave, and will have 14 days to receive either a single-dose vaccine or the first dose of a two-dose vaccine. Staff will remain on administrative leave until fully vaccinated. If this deadline is not met, the individual will be subject to termination.

COVID-19 VACCINATION POLICY & PROCEDURES

- C. For Medical Staff Members any corrective action processes will be administered in accordance with the applicable provisions of the applicable Medical Staff Bylaws.
- D. Non-employed Health Care Personnel and Contracted Personnel who are not either fully vaccinated or approved for a vaccine exemption in accordance with this policy by October 18, 2021, will have their contract or student agreement terminated.
- E. Any Personnel who fail to comply with the October 18, 2021, deadline will not be permitted to access Brattleboro Retreat facilities until they demonstrate compliance with this Policy.

VACCINE EXEMPTIONS:

1. Medical Exemptions

- a. Personnel requesting an exemption for medical reasons must have their health care provider complete the "Request for Medical Exemption from COVID-19 Vaccination" form and submit the form to Employee Health Services via email swillis@Brattlebororetreat.org by October 8, 2021.
- b. The Brattleboro Retreat will use standard medical criteria for evaluating medical-related exemptions based upon recommendations from the Centers for Disease Control and Prevention (CDC).
- c. Each request for a medical exemption will be evaluated by the Chief Medical Officer (CMO). Personnel may be referred for additional medical evaluation or specialty consultation by the CMO. Failure to comply with the CMO's requests will result in denial of the exemption request. Decisions made by the CMO are final.
- d. Personnel will be notified in writing by the Vice President of Human Resources regarding the outcome of their request for a medical exemption.
- e. Any exemptions granted for medical reasons may require re-evaluation as determined by the CMO when new COVID-19 vaccines become available. Accordingly, vaccine exemptions that are granted may be time-limited or vaccine-specific.
- f. If a vaccine exemption is granted, additional infection prevention and control measures will be required for the individual, including, but not limited to, wearing a face mask at all times while on Brattleboro Retreat property except when working in a private individual office or while eating/drinking in a non-public area where individuals are reliably separated by more than 6 feet from others; eye protection when caring for or treating patients; and PCR testing on a regular basis.

COVID-19 VACCINATION POLICY & PROCEDURES

2. Religious Exemptions

- a. Personnel requesting a religious exemption from COVID-19 vaccination must complete the "Request for Religious Exemption from COVID-19 Vaccination" form and submit the form to the VP of Human Resources via email at bwaite@Brattlebororetreat.org by October 8, 2021.
- b. Requests for vaccine exemptions based on religious considerations will be reviewed by Human Resources based on prevailing laws and regulations. The VP of HR may confer with Legal Counsel regarding requests for religious waivers. Decisions regarding religious waivers will be made by the VP of HR and will be final.
- c. Personnel will be notified in writing by Human Resources regarding the outcome of a request for religious exemption.
- d. If a religious exemption is granted, additional infection prevention and control measures will be required for the individual, including, but not limited to, wearing a face mask at all times while on Brattleboro Retreat property, except when working in a private individual office or while eating/drinking in a non-public area where individuals are reliably separated by more than 6 feet from others; eye protection when caring for or treating patients; and PCR testing on a regular basis.

ROLES/RESPONSIBILITIES:

A. Managers and Supervisors

1. Ensure all Personnel are aware of this policy, the mandatory vaccine requirement, the exemption process, and any applicable educational materials regarding the vaccine, as appropriate.
2. Maintain the confidentiality of any medical information or information concerning vaccine status of Personnel. Such information should be treated as need-to-know only.
3. Ensure all Personnel, vaccinated or not, are aware of any department- specific requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self, and others.
4. Ensure all Personnel with an exemption follow any additional required restrictions, safety protocols, or safety requirements related to using protective equipment when performing certain job activities within the department or elsewhere within the facility to minimize health risks to patients, self, and others.

COVID-19 VACCINATION POLICY & PROCEDURES

5. Ensure all policy and procedural steps are followed as outlined in this policy, including communicating and administering failure to comply consequences in a timely and consistent manner.

B. Health Care and Contracted Personnel

1. Ensure vaccination compliance by the stated deadlines in this policy or as directed by the CMO or CNO.
2. For those with approved vaccine exemptions, comply with all restrictions, safety protocols, and safety requirements as directed due to non-vaccinated status. Wear appropriate PPE specified for non-vaccinated individuals, which may include masks and/or face shields and other PPE for the period of time designated by management and/or Infection Control. Failure to comply will result in termination or discontinuation of a contract.
3. Follow all COVID-related reporting and safety protocols, whether vaccinated or not.

C. Employee Health & Infection Prevention

1. Coordinate the Brattleboro Retreat Vaccine Clinics to provide COVID-19 vaccinations to all Health Care Personnel and Contracted Personnel during the designated timeframe with appropriate consent.
2. Maintain all records of COVID-19 immunizations and exemptions, ensuring timely input of compliance in appropriate management information systems.
3. Review requests for vaccine exemptions for medical reasons on a timely manner and coordinate with the Chief Medical Officer as quickly as possible.
4. Work with appropriate departments/resources to provide additional health education consultation regarding benefits of vaccination and appropriate provision of protective equipment for non-vaccinated individuals.

D. Human Resources

Provide consultation to managers and employees regarding the interpretation and application of this policy.

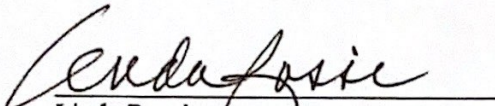
1. Review and respond to requests for vaccine waivers in a timely manner.
2. Monitor employee compliance and process suspensions and termination for noncompliance in accordance with this policy.

COVID-19 VACCINATION POLICY & PROCEDURES

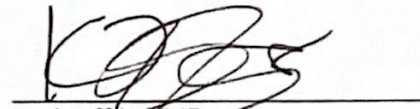
RELATED FORMS:

- Request for Medical Exemption from COVID-19 Vaccination
- Request for Religious Exemption from COVID-19 Vaccination

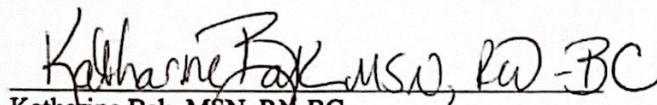
APPROVALS:



Linda Rossi
Acting President and Interim Chief Executive Officer



Karl Jeffries, MD
Chief Medical Officer



Katharine Bak, MSN, RN-BC
Chief Nursing Officer