



VACCINATE with CONFIDENCE

TIPS TO IMPLEMENT EMPLOYEE VACCINE MANDATES AT COMMUNITY HEALTH CENTERS

All Health Centers Must Have Policies:

- To ensure all staff complete the required vaccination series prior to staff providing any care, treatment, or other services for the clinic or center and/or its patients;
- To include nationally recognized infection prevent and control guidelines
- Creating additional precautions for staff not fully vaccinated
- For staff to request vaccination exemption based on medical, religious, or temporarily delays
- For verifying documentation provided for medication exemption
- Creating a contingency plan for staff who are not fully vaccinated

All Health Centers Must Track and Securely Document:

- Each staff member's vaccination status (this should include the specific vaccine received, and the dates of each dose received, or the date of the next scheduled dose for a multidose vaccine);
- the percentage of unvaccinated staff, excluding those staff that have approved exemptions
- Any staff member who has obtained any booster doses (this should include the specific vaccine booster received and the date of the administration of the booster);
- Staff who have been granted an exemption from vaccination (this should include the type of exemption and supporting documentation); requirements by the RHC/FQHC; and
- Staff for whom COVID-19 vaccination must be temporarily delayed and should track when the identified staff can safely resume their vaccination.

Health centers must have an effective process for staff to request a religious exemption for a sincerely held religious belief. This process must include:

- A process for staff to request an exemption based on federal law (EEOC)
- How to request an exemption and to whom should it be submitted
- Process for collecting and evaluating such requests
- Must track and document:
 - Staff that have requested
 - The facility determination of the requests
 - Any accommodations granted

Please review November's Operational Guide for sample policies and procedures

Contingency Plan

Health centers must develop contingency plans for staff who have not completed the primary vaccination series for COVID-19. This includes staff that have been granted exemptions and/or have indicated they will not get vaccinated.

Contingency plans should:

- Prioritize staff that have obtained no doses of vaccine over staff that have incomplete vaccination series
- Establish deadlines for unvaccinated staff to receive the required doses
- Policies for staff that do not meet the vaccination deadlines
- Educational outreach efforts for unvaccinated staff

Recommended Accommodations for Unvaccinated Staff

This includes staff who are not yet fully vaccinated, or who have been granted an exemption or accommodation, or who have a temporary delay:

- Reassign staff to non-patient care areas, telework, or duties which limit exposure to those most at risk
- Requiring unvaccinated staff to adhere to universal source control and social distancing in areas restricted from patient access (staff meeting rooms, kitchen)
- Requiring at least weekly testing
- Requiring staff to use a N95 or virulent
- Consult with your local health department



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).
- Contact Regulatoryaffairs@nachc.org with questions
- Visit [NACHC's Employee Vaccine Mandate Technical Resource page](#) for more information.

Information source

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