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).