

## MEMORANDUM

**To:** UMRC & PH Residents, Participants and Team Members

**From:** Missi Latter, VP of Quality and Compliance & Steve Fetyko, CEO

**Date:** 9/20/21

**Re:** Vaccination Mandating and Covid Boosters

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Recently it was announced the Center of Medicare and Medicaid Services (CMS) will be mandating vaccines for all team members in skilled nursing and long-term care. Since then, the President announced further vaccination requirements for healthcare employers as well as private sector employers, to reduce the number of unvaccinated Americans. Additionally, recommendations for booster doses were also announced.

Below are the highlights of what we think we understand based on the information we have received thus far in regard to vaccine mandates and covid booster doses. However, this is all subject to the final written guidance coming out.

### **What we Know:**

- Vaccination will be required for all team members working in areas that receive federal funding (Medicare/Medicaid). For our organization this would include:
  - Skilled Nursing, Home Health, PACE locations
- Employers with over 100 team members will be required to have their team members vaccinated or tested weekly.
  - UMRCPH employs over 100 team members shore to shore. While we have multiple locations with less than 100 team members each, our organization is considered a combined organization as it relates to number of team members for many regulatory matters.

- Employers need to provide paid time off for the time it takes a team member to get vaccinated.
  - UMRC and Porter Hills allows this now if you are not able to get vaccinated at one of the on-site clinics while you are working.
- Those who have a qualifying reason to decline the vaccine under the EEOC or ADA will have the opportunity to request such a waiver.
  - Waivers are not automatically approved and do require a review through the Human Resources department.
- Booster doses are not yet approved by the FDA.
  - On 9/17/21 an Advisory Panel made recommendations to the FDA but final approval must be received before booster doses can be administered.
  - Once approved, UMRCPH will work to set up booster dose clinics onsite.

### What we Don't Know:

- When vaccination mandate takes effect
  - We have heard the final rule should be out by the first part of October
- For the 'over 100 employees' to get vaccinated or get tested requirement:
  - We don't know frequency of weekly testing (once, twice, etc.)
  - We don't know who is responsible for the cost (employee or employer)
- If additional changes will be included that were not originally announced as part of the President's vaccine plan

Outside of the initial announcements, there has been no additional information related to the specifics of these new requirements. We will continue to prepare while awaiting the actual guidance and will continue to update you as we learn more. **While we await further information, we encourage anyone who is currently unvaccinated to become vaccinated.**

If you have any questions, need assistance scheduling a vaccination, would like more information, or wish to talk to someone directly, please feel free to reach out at [covidvax@umrc.com](mailto:covidvax@umrc.com) and we will follow up with you individually.