



## OHSU POLICY MANUAL

**Policy Number:** 03-30-150

**Policy Title:** COVID-19 IMMUNIZATIONS AND EDUCATION

**Effective Date:** October 18, 2021

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### 1. Purpose

To protect OHSU Members, patients, visitors, research subjects, and animal assets of OHSU from COVID-19, to promote COVID-19 vaccination of all OHSU Members, and to comply with Oregon law.

### 2. Generally

OHSU Members must (A) provide documentation that they are fully vaccinated with an FDA or WHO-authorized COVID-19 vaccine **OR** (B) obtain an exception, complete education, and adhere to set requirements for unvaccinated individuals.

“Fully vaccinated” means having received both doses of a two-dose COVID-19 vaccine or one dose of a single-dose COVID-19 vaccine and at least 14 days have passed since the individual’s final dose of COVID-19 vaccine. This definition may be modified to include subsequent boosters and/or additional doses as recommended by the CDC.

### 3. Responsibilities

#### A. Employees and Volunteers

- 1) OHSU employees and volunteers must complete and submit proof of COVID-19 vaccination or obtain an approved exception. In order to meet compliance, they must do one of the following:
  - a) Receive the COVID-19 vaccination through OHSU’s Occupational Health (OH) sponsored vaccination program; OR
  - b) Log into Enterprise Health and upload proof of COVID-19 vaccination received elsewhere; OR
  - c) Employees (not volunteers) may submit, and receive approval for, a medical or religious exception request and supporting documentation and complete education through [Enterprise Health](#).

- 2) OHSU provides COVID-19 vaccinations to all employees and volunteers free of charge. Once fully vaccinated, they receive a COVID-19 vaccination sticker to place on the front upper middle section of the ID badge.
- 3) An employee or volunteer who gets fully vaccinated for COVID-19 elsewhere must formally attest to this and submits proof of vaccination through Enterprise Health. The individual may then contact OH for a COVID-19 vaccination sticker to place on their badge.
- 4) If an employee requests an exception from receiving a COVID-19 vaccination, they must submit an exception request form via Enterprise Health, receive approval for that exception, and complete required vaccine-related education. The employee will not receive or be permitted to wear a COVID-19 vaccination sticker and while on OHSU-owned or controlled property must abide by any requirements for unvaccinated individuals issued by OHSU.

**B. Non-OHSU-Employed, Contracted Personnel and Others**

Employers of non-OHSU-employed contracted personnel; visiting faculty, researchers, and health care practitioners; vendors; and others who receive a badge at OHSU or work on OHSU-owned or controlled property are responsible for verifying that individuals are fully vaccinated who are assigned or placed at OHSU and providing an attestation of that vaccination to their OHSU sponsor. The attestation must be on letterhead stating that its employees are compliant with Oregon Health Authority and OHSU's COVID-19 immunization policies. The individuals are responsible for receiving a COVID-19 vaccination and providing documentation at one of the OHSU Transportation and Parking Customer Service Centers as a prerequisite for receiving an OHSU badge and COVID-19 vaccination sticker. If a non-OHSU-employed contracted personnel; visiting faculty, researchers and health care practitioners; vendors; or others who receive a badge at OHSU has obtained an approved medical or religious exception from receiving the vaccine through their own employer, they will need to provide an attestation that an exception has been approved by their employer to their OHSU sponsor or program. OHSU may request additional supporting documentation to evaluate this exception request.

**C. Students**

- 1) OHSU students must complete and submit proof of COVID-19 vaccination or request an exception. In order to meet compliance, they must do one of the following:

- a) Receive the COVID-19 vaccination through OHSU's Occupational Health-sponsored vaccination program; OR
  - b) Log into Enterprise Health and upload proof of COVID-19 vaccination received elsewhere; OR
  - c) Submit, and receive approval for, a medical or religious exception request and supporting documentation and complete education through [Enterprise Health](#).
- 2) OHSU provides COVID-19 vaccinations to all OHSU students free of charge. Once vaccinated, students can receive a COVID-19 vaccination sticker which they may place on the front upper middle section of the ID badge.
  - 3) An OHSU student who gets fully vaccinated for COVID-19 elsewhere, formally attests to this, and submits proof through Enterprise Health, may then contact the Student Health and Wellness Center (SHW) for a COVID-19 vaccination sticker which they may place on their badge.
  - 4) If an OHSU student requests an exception from receiving a COVID-19 vaccination, they must submit an exception request form via Enterprise Health, receive approval for that exception, and complete required vaccine-related education. The student will not receive or be permitted to wear a COVID-19 vaccination sticker, and while on OHSU-owned or controlled property must abide by any requirements for unvaccinated individuals issued by OHSU.
  - 5) Non-OHSU students and trainees are responsible for being vaccinated through their home institution academic programs, health care providers or outside facilities and providing proof that they are fully vaccinated to Occupational Health or the Office of Volunteers and Visitors in exchange for an OHSU COVID-19 vaccination sticker. Unvaccinated students and trainees with approved exceptions will not receive or be allowed to wear a COVID-19 vaccination sticker and while participating in an OHSU academic or training program must comply with requirements for unvaccinated individuals issued by OHSU.

**4. Exceptions and Education**

- A. OHSU Members may request an exception from receiving the vaccine for the following reasons:

- 1) A medical exception which is corroborated by a document signed by a medical provider, who is not the individual seeking the exception, certifying that the individual has a physical or mental impairment that limits the individual's ability to receive a COVID-19 vaccination based on a specified medical diagnosis, and that specifies whether the impairment is temporary in nature or permanent; or
  - 2) A religious exception signed by the individual stating that the individual is requesting an exception from the COVID-19 vaccination requirement on the basis of a sincerely held religious belief and including a statement describing the way in which the vaccination requirement conflicts with the sincerely held religious observance, practice, or belief of the individual.
- B. Any OHSU Member requesting an exception may be requested to provide additional information through Student Health and Wellness, Occupational Health or the Affirmative Action and Equal Opportunity Department to evaluate the OHSU Member's request.
- C. All exception requests will be reviewed and approved or denied by an Exception Review Panel. If an exception is granted, OHSU will evaluate whether a reasonable accommodation is available, but no unvaccinated OHSU Member will be permitted to engage in direct, in-person patient care contact unless approved by the President or the President's designee.
- D. Any OHSU Member requesting an exception from the COVID-19 vaccination must complete an educational video on COVID-19 vaccines through Enterprise Health.

## 5. **Compliance Requirements**

All OHSU Members must be in compliance with this policy.

Persons newly employed, admitted, enrolling in courses, contracted, visiting or volunteering **(1)** must be fully vaccinated or obtain an approved exception prior their start date or matriculation; and **(2)** must provide proof of full vaccination or an approved exception within 10 business days of start date or matriculation.

OHSU Members who fail to comply with requirements of this policy will be suspended from accessing OHSU facilities and subject to consequences, as follows:

**Employees:** Unpaid leave and/or termination of employment (deemed to have voluntarily resigned, or terminated in compliance with applicable collective bargaining agreements);

**Volunteers:** Suspension of access and/or termination of volunteer status;

**Non-OHSU-employed contracted personnel; visiting faculty, researchers and health care practitioners; vendors; and others who receive a badge:**  
Suspension of access to OHSU facilities; and

**Students:** Suspension of physical and virtual access to sites and resources at OHSU (including courses) and its academic and clinical partners. Students shall be placed on immediate Interim Suspension from their program (per OHSU Policy 02-30-050) pending a disciplinary hearing. If there is a failure to comply within ten (10) business days, a school or program level disciplinary hearing shall be initiated. Students shall remain on Interim Suspension until at least the conclusion of the disciplinary proceedings. The outcome of disciplinary proceedings includes but is not limited to dismissal.

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**Related Policies and Procedures:**

**OAR 333-019-1010**

**OHSU Policy 02-90-010, Student Health**

**OHSU Policy 03-30-130, Required Communicable Disease Screening, Testing, Immunizations and Training**

**HC-IPC-100-POL, Infectious Disease Exposure Response Plan**

**[Required Screening, Testing, Immunizations and Training Matrix](#)**

**Implementation Date: October 18, 2021**

**Responsible Offices: Occupational Health (OH) and Student Health and Wellness (SHW)**