

# COOPER UNIVERSITY HEALTH CARE

## Corporate Policies and Procedures

Supersedes:	09/23/2021	Section:	COVID-19 Temporary
Reviewed:	02/03/2022	Subject:	Policy for COVID Testing of Unvaccinated Employees

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**Notice: The official version of this Policy is contained in Cooper Policy Network and may have been revised since the document was printed.**

I. PURPOSE:

- A. To ensure compliance with the NJ Executive Order and CMS Interim Final Rule on SARS-COV2 Vaccination, Exemption and Testing of workers at Cooper locations.

II. DEFINITIONS:

- A. **Fully Vaccinated**- An individual is considered Fully Vaccinated greater than or equal to 2 weeks following receipt of the second dose in a 2-dose series, or greater than or equal to 2 weeks following receipt of one dose of a single-dose vaccine. There is currently no post-vaccination time limit on fully vaccinated status. Acceptable vaccinations are those approved by the FDA under EUA and those approved by WHO (e.g. AstraZeneca).
- B. **Unvaccinated** refers to an individual who does not fit the definition of “fully vaccinated,” including those who are partially vaccinated and whose vaccination status is not known.
- C. **Full Time Remote**: team member who works off-site 100% of the time with no contact with patients or Covered Workers.
- D. **Cooper Team Member**: Individuals employed directly by Cooper, including Residents and Volunteers.
- E. **Covered Workers**: All Cooper Team Members, Medical Staff & Residents, Students, Contractors, Vendors, Temporary Labor, Volunteers and other individuals who routinely provide services, volunteer or learn in-person within any Cooper University Health Care facility. Covered Worker excludes those who work remotely and do not perform work on Cooper premises.

III. POLICY:

- A. In accordance with the New Jersey Executive Order 252 and the CMS Interim Final Rule, all Covered Workers who learn or provide services in-person within any Cooper University Health Care facility must be Fully Vaccinated unless they have requested and received an exemption.

IV. POLICY IMPLEMENTATION:

- A. Cooper Team Members:

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1. Covered Workers employed prior to December 5, 2021 shall receive at Cooper or provide proof of having received one dose of a single dose vaccine or 2 doses of a multidose vaccine or request an Exemption prior to January 31, 2022.
  2. Covered Workers beginning employment after December 5, 2021 shall receive at Cooper or provide proof of having received one dose of a single dose vaccine or 2 doses of a multidose vaccine or request an Exemption prior to beginning work at a Cooper facility.
  3. All Covered Workers shall receive at Cooper or provide proof of having received a second dose within 30 days after the first dose of a multidose vaccine or have an approved Exemption.
- B. Qualifying Exemptions:
1. Temporary Exemption: Unvaccinated Cooper team members whose vaccination should be delayed based on CDC Guidance shall be exempt until CDC Guidance allows for vaccination. Contact Employee Health for approval of this Temporary Exemption from vaccination. Thereafter, Covered Workers shall receive vaccinations before beginning work at a Cooper facility or request an exemption.
  2. Medical Exemption: Allergy to Polyethylene glycol (PEG ) and recognized clinical conditions as described by the CDC informational document Summary Document for Interim Clinical Considerations for Use of COVID-19 Vaccines constitute contraindications to receiving a COVID-19 vaccine, and may provide grounds for exemption. The Medical Exemption Form must be completed in its entirety by both the employee and the employee's practitioner and be signed and dated by a licensed practitioner acting within their respective scope of practice. The Form must be returned to Employee Health. For Cooper Team Members, Cooper will evaluate the request and advise of approval or disapproval of the request.
  3. Religious Exemption: The Religious Exemption Request Form must be completed in its entirety by the employee and returned to Employee Health. For Cooper Team Members, Cooper will evaluate the request and advise of approval or disapproval of the request.
  4. Accommodations of Unvaccinated Team Members with a Qualifying Exemption: All Covered Workers that have approved exemptions (temporary, medical or religious), will be accommodated by required masking while indoors, required weekly testing, required social distancing, and may include additional PPE precautions that will be provided on an individual basis.

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- C. Testing for Team Members: Any unvaccinated Covered Worker must be tested at least once per week until they are fully vaccinated. Unvaccinated Cooper team members are responsible for ensuring that SARS-COV2 testing is completed at a Cooper test site location within seven days prior to the scheduled shift, on the last worked day of the preceding work week. There is no out-of-pocket charge to the team member when tested through Cooper. Unvaccinated Covered Workers shall be tested twice per week as required by Cooper in accordance with Executive Order 252.
1. Testing must be performed at a Cooper location except as provided below:
    - a. Those who do not work onsite at Cooper location but who work with Cooper patients (i.e. Cooper pilots or see patients at non-Cooper locations) may have offsite testing and are responsible for emailing results obtained at least once per week to employee health at [EmployeeHealthNurse@CooperHealth.edu](mailto:EmployeeHealthNurse@CooperHealth.edu). Cost of offsite testing is the responsibility of team member.
    - b. Cooper team members who are per diem and get tested through another employer may have offsite testing and are responsible for emailing results obtained at least once per week to employee health at [EmployeeHealthNurse@CooperHealth.edu](mailto:EmployeeHealthNurse@CooperHealth.edu). Cost of offsite testing is the responsibility of team member.
    - c. Team members who are permitted to test elsewhere may test at Cooper free of charge.
  2. If an unvaccinated team member typically works remote and is not a Covered Worker, but is scheduled onsite (such as a remote worker scheduled for an adhoc meeting) at any time during the next seven days (i.e. onsite meeting for remote team members) the team member must undergo SARS-COV2 testing and submit their results prior to on-site meeting to Employee Health at [EmployeeHealthNurse@CooperHealth.edu](mailto:EmployeeHealthNurse@CooperHealth.edu).
  3. If an unvaccinated Team Member will not be on-site at a Cooper facility during the course of the next seven days (i.e., vacation and 100% remote team member), no testing is needed until team member is scheduled to return to work on site.
  4. Team members who tested positive within the past 90 days do not need to be tested weekly if not fully vaccinated. The team member needs to provide a hard copy of the test ( if testing done outside of Cooper)
- D. **Covered Workers who are not Cooper team members:**

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1. Contractors must provide documentation of vaccination or an approved exemption to Cooper for all workers working at Cooper locations. Contractors may utilize the [Vendor COVID Vaccination Attestation Form](#) for documentation purposes. Any Exempted Covered Workers who are not Team Members will also be accommodated by required weekly testing and social distancing and may have additional accommodations on an individual basis.
  2. Contractors may use the publicly-available Cooper University Health Care CCIA Garage Testing Site to meet the weekly testing requirements. Results will go to the Cooper Workers' MYChart account, and it remains the responsibility of the Cooper Worker to report these results to their employer for reporting back to Cooper University Health Care.
  3. Contractors must maintain documentation of vaccination, exemption and testing and provide to Cooper upon requests.
  4. Schools whose students are Cooper Workers are responsible for ensuring that their Cooper Workers are fully vaccinated and must submit documentation of vaccination to Cooper.
  5. Community Medical Staff are responsible for providing proof of vaccination or an exemption request to the Medical Staff Office. Exemption requests will be evaluated by Cooper in accordance with the CMS Interim Rule to determine whether the request can be accommodated. Unvaccinated Community Medical Staff shall ensure that they are tested at least weekly and retain documentation of weekly testing which must be provided to Cooper upon request
  6. Schools and Contractors may not send Cooper Workers to a Cooper location if they are not compliance with the requirements in this policy.
- E. **Contingency Plan For Covered Workers that are not fully vaccinated:** Covered Workers who have not completed the primary vaccination series and have not requested or been approved for a qualifying exemption by January 27, 2022 will be subject to the following:
1. Education on vaccination and risks and benefits
  2. Offering vaccination and providing information on exemption requests
  3. Covered Workers who are not fully vaccinated due to an exemption or temporary exemption in vaccination, shall abide by testing, social distancing and any other accommodations or additional precautions indicated on an individual basis..
  4. If Covered Workers have not received at least one dose of vaccine or requested an exemption by January 27, 2022, that Covered Worker may not continue to

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work at Cooper facilities. Team Members will be subject to Compliance below.  
Contractors must send replacement Covered Workers.

V. PROCESS FOR COVID TESTING OF UNVACCINATED TEAM MEMBERS:

- A. Team member testing is available in the CCIA Garage testing site. Contact Employee Health for current testing processes.

VI. REPORTING and DOCUMENTATION:

- A. Cooper Employee Health tracks vaccination, boosters and testing for Cooper team members and reports positive test results to the local health department.
- B. Contractors and schools shall track vaccinations and weekly testing for their Cooper Workers. Contractors shall provide documentation of vaccination or exemption to Cooper prior to the Covered Worker working at a Cooper facility and shall provide reports of testing to Cooper upon request. Contractors and Schools are responsible to report positive test results to the local health department and to Cooper.
- C. Cooper maintains documentation of Team Member exemption requests and whether the request was granted or denied.
- D. Team Members who are full time remote are tracked but are not required to be vaccinated or tested.
- E. Employee Health tracks those Covered Workers whose vaccination must be temporarily delayed and when they can resume vaccination.

VII. COMPLIANCE:

- A. This section is written in recognition of the NJ Executive Order and CMS Interim Final Rule, which requires healthcare workers to receive a COVID vaccine or receive a qualifying exemption and, if unvaccinated, participate in weekly COVID testing. Any Cooper Covered Worker, covered by this policy, who fails to comply within the assigned time period for vaccination, requesting an exemption or testing may be suspended without pay and given up to seven (7) consecutive days to be vaccinated or request an exemption in compliance with the above procedures. If the team member refuses to be vaccinated or request an exemption within those seven (7) days, the direct supervisor should consult with their Human Resources Business Partner and proceed with termination of employment for failure to comply with the requirements of this program.

VIII. RELATED FORMS:



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A. [Vendor COVID Vaccination Attestation Form](#)

### IX. REFERENCES:

- A. CMS Interim Final Rule
- B. New Jersey Executive Order 252, (August, 2021). [Microsoft Word - EO-252 \(nj.gov\)](#)

### APPROVED BY:

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