

OHSU Exceptions Requests and Accommodations Process and FAQs

Process

The OHSU Vaccine Exception Review Panel includes representatives from Occupational Health/Student Health and Wellness, Human Resources, Affirmative Action and Equal Opportunity (AAEO)/Student Access, the Center from Diversity and Inclusion (CDI) and Legal. This panel will review all employee, student and volunteer requests for exceptions to the vaccine mandate of OHSU Policy 03-30-150 and OHA 333-019-1010 and determine approvals or denials.

The medical and scientific community continue to learn how to best prevent the spread of COVID-19. Please know that OHSU reserves the right to alter or revoke approved exceptions or accommodations if we believe that additional health and safety measures are needed to protect our community.

Exception Criteria

Medical

Medical exceptions and accommodations will be allowed only for specific reasons consistent with guidance from the Centers for Disease Control and Prevention (CDC), including:

- Documented history of severe allergic reaction to one or more components of all three currently approved COVID-19 vaccines.
- Documented history of severe or immediate-type hypersensitivity allergic reaction to a COVID-19 vaccine, and separate contraindication to other available formulations.
- Individuals who have received monoclonal antibodies for the treatment or prophylaxis following exposure of COVID-19 for 90 days after administration.

Examples of conditions that would not qualify for a medical accommodation include:

- History of severe allergic reactions to foods, oral medications, latex, pets, insects and environmental triggers.
- Trypanophobia (fear of injections or needles).
- Previous history of normal vaccine side effects or general avoidance of vaccines.
- History of COVID-19 infection.
- Concerns that vaccination could exacerbate an autoimmune disorder.
- Routine requests because of pregnancy.

Religious

In accordance with relevant federal and Oregon law, members who can demonstrate a sincerely held religious belief and past behavior consistent with that belief will be

accommodated. Please be advised that social, political or economic philosophies, or personal preferences, are not considered to be religious beliefs.

Examples of beliefs or past behavior that may disqualify an individual from receiving a religious exception include:

- An objection to the vaccine on the basis of fetal cell concerns.
 - No fetal tissue or cells are contained in any of the vaccines currently available under FDA approval or emergency use authorization in the U.S.
 - While they played no role in their development or production, HEK-293 cell lines created over 50 years ago were used in confirmatory testing of the current mRNA vaccines. Cells from the same line have commonly been used in biologic research since the late 70s. This cell line is used in the testing of many common medicines, including Tylenol, Advil, Aspirin, Claritin, Benadryl, Pepto-Bismol, Mucinex, Tums and Prilosec, among many others.
 - Given the gravity of the pandemic and lack of alternative vaccines, both the Vatican and the U.S. Conference of Catholic Bishops have endorsed the use of the Pfizer/BioNTech and Moderna vaccines, despite their remote connection to fetal tissues. The president of the National Association of Evangelicals, and leadership of the Orthodox (Jewish) Union issued a joint statement encouraging their members to be vaccinated.
- Receiving another vaccine in the last five years.

What is the timeline?

- The Enterprise Health exception form closed to new submissions after Sept. 20.
- Members who have applied for an exception will receive a response by Oct. 2, but a determination may not be made by Oct. 18, and it is likely that additional interaction regarding the request will be needed to assess the request. Requesting employees will be placed on unpaid administrative leave starting Oct. 19 until the final determination is made.
- Managers of employees who have indicated they do not intend to comply or have taken no action should plan for staff vacancies and may post positions beginning Sept. 21.
- An approved exception does not guarantee an accommodation will be available.

What should I do if I have staff who are not vaccinated and have not filed an exception form?

Managers of employees who have indicated they do not intend to comply or have taken no action should plan for staff vacancies and may post positions beginning Sept. 21.

If I'm approved for a medical or religious accommodation and come to campus, what protocols will I be required to follow?

If your exception is approved using this guidance, OHSU still must keep you, your colleagues and our patients safe. This will likely evolve as we learn more about how to best prevent the spread of COVID-19. OHSU will endeavor to find accommodation for exempt, but unvaccinated employees that do not involve direct, in-person patient contact. In the event that an accommodation that maintains the safety of our patients and employees cannot be found, an employee may be placed on unpaid leave. As the situation evolves, OHSU will periodically assess whether and under what circumstances these employees might once again participate in patient care.

Similarly, because of the current national public health emergency resulting from the COVID-19 pandemic, OHSU will not place unvaccinated students in direct, in-person, patient contact for the foreseeable future. OHSU programs will endeavor to find reasonable accommodations for unvaccinated students who have received approved exceptions to try and support their degree progression while they are unable to engage in direct, in-person, patient contact. As the situation evolves, OHSU will periodically assess when and under what circumstances these students might once again participate in patient care activities.

If you have an approved exception, and work in an OHSU building, you currently will need to:

- Wear an approved and fit-tested respirator or the N95 or equivalent at all times, except when actively eating/drinking, in accordance with OHA requirements.
- Maintain physical distancing from others when indoors in a clinical area
- Maintain at least 6-foot distance when actively eating/drinking and mask is removed.
- Wear a mask outdoors when 6-foot distance from others cannot be maintained.
- Get tested at least twice weekly.

What if I am a fully remote worker or on personal time off (PTO) or leave of absence (LOA)?

Employees who are fully remote (100%) and do not come to a OHSU facility must comply with the vaccine requirement or have an approved exception and accommodation, but are not required to test unless they have symptoms. If a fully remote employee with an approved exception must come to an OHSU location for any reason, they must have a negative COVID-19 test less than 48 hours prior to that event.

- Employees on LOA or PTO with an approved exception must have a negative COVID-19 test less than 48 hours before returning to the workplace.

What are the current testing protocols for unvaccinated employees and students?

All employees and students who access OHSU facilities and are unvaccinated must test for COVID-19 at least twice-weekly and upload those results to Enterprise.

Testing protocols for unvaccinated employees and students:

- Tests must occur twice in each Monday-to-Sunday period, with 72 hours between tests.
- Health care workers who develop symptoms between tests should isolate, call Occupational Health, and repeat their test immediately.
- Only lab-based tests are approved. Home-based and antigen tests are not approved to meet compliance.