

CMS Vaccine Mandate FAQ's

What authority is the Federal government using to impose vaccine requirements on health care providers?

CMS (Centers for Medicare & Medicaid Services) is making compliance with the vaccine mandate a “condition” of getting Medicare and Medicaid reimbursement. In other words, once the mandate is in effect, health care providers who do not comply will not be eligible to be paid by Medicare or Medicaid, even if they provide care to these patients. This CMS rule takes priority above other federal vaccination requirements.

A precedence for using Medicare reimbursement to address social challenges was set in 1966, when the newly established Medicare program announced that hospitals must be fully desegregated to receive Medicare reimbursement. At the same time, teams of volunteers visited hospitals across the country to verify compliance with the requirement. Within a few months over 95% of US hospitals were desegregated.

I am an employee of GLBHC but I work from home. Does the vaccination requirement apply to me?

Yes. The Vaccine Mandate Policy applies to all employees of GLBHC, at any site, including remote workers. Because staff that primarily provide services via telework will occasionally encounter fellow staff, such as in an administrative office or at an off-site meeting, who will themselves enter a health care facility or site of care for their responsibilities, the mandate applies. “Any individual that performs their duties at any site of care or has the potential to have contact with anyone at any site of care must be fully vaccinated to reduce the risks of transmission of COVID.”

Will staff who leave employment because they chose not to be vaccinated be eligible for unemployment?

It is important to clarify that an employee who chooses not to be vaccinated and does not qualify for a medical or religious exemption is choosing not to fulfill a condition of employment. Therefore, the employee is not being terminated; rather, the employee is choosing not to fulfill the requirements for employment and are voluntarily relinquishing their ability to remain employed at GLBHC. An employee may file for unemployment anytime they separate from an employer. Determination of eligibility will be made by the Michigan Unemployment Insurance Agency.

If an employee resigns because they are not willing to be vaccinated against COVID-19, can they ever be rehired?

Like any employee in good standing who voluntarily separates from GLBHC, they are eligible for rehire; however eligibility for rehire does not guarantee reemployment or priority consideration in the hiring process. If rehired, like all new employees, vaccination against COVID-19 would be a condition of employment.

What is the GLBHC Exemption Review Committee and how will the process work?

The committee is comprised of multidisciplinary GLBHC employees. Medical exemption requests will be reviewed with priority given to the advisory opinions of established and credible medical professional organization including but not limited to the American Academy of Pediatrics, American Academy of Family Physicians, American College of Obstetrics and Gynecology, Society for Fetal and Maternal Health, American College of Physicians, and the Centers for Disease Control.

Does “fully vaccinated” include additional doses or booster doses?

For the purposes of this regulation, CMS currently considers staff fully vaccinated if it has been 2 weeks or more since they completed a primary series of COVID-19 vaccine. Employees are encouraged to receive third doses or booster doses as recommended by the CDC.

Does this regulation include testing requirements for unvaccinated staff?

No, this regulation requires staff vaccination only. Current GLBHC policy requires weekly testing for unvaccinated staff, which remains in place at this time.

Are staff who have previously had COVID-19 exempt?

No. Evidence is emerging that people get better protection by being fully vaccinated compared with having had COVID-19. One study showed that unvaccinated people who already had COVID-19 are more than 2 times as likely than fully vaccinated people to get COVID-19 again.

If you were treated for COVID-19 with monoclonal antibodies or convalescent plasma, you should wait 90 days before getting a COVID-19 vaccine.

Who is GLBHC’s Corporate Immunization Coordinator?

Heather Yawn is currently responsible for coordination of GLBHC’s immunization practices as well as employee health activities across the organization.

How can I get my questions answered?

Send your question to covid19@glbhealth.org and it will be directed to the correct person or department to get your answers.