

COVID-19 Vaccination Mandate

Healthcare Professional Quick Reference Guide



Healthcare Professional FAQ's

What is the Current Federal CMS Mandate?

The CMS (Centers for Medicare and Medicaid) issued a Federal mandate for all healthcare facilities that receive Medicare or Medicaid to require Healthcare Professionals who are unvaccinated to have their first dose of a two-dose COVID-19 vaccine (defined by the CDC as receiving the second dose in a 2-dose series; e.g., Pfizer and Moderna vaccines) OR receiving a single-dose vaccine (e.g., Johnson & Johnson's Janssen vaccine) **by January 27, 2022** for the following states FL; HI; MA; MI; MN; NC; NV; PA; TN; VT; WI (*CA; CO; CT; DC; DE; IL; ME; MD; NJ; NM; NY; OR; RI; WA already have state mandates in place*) or have an approved exemption based on religious/medical accommodations. The CMS mandate has a **final compliance deadline of February 28, 2022** for all covered Healthcare Professionals to meet the vaccination requirements that are outlined above. For the additional 23 states AL; AK; AZ; AR; GA; ID; IN; IA; KS; KY; LA; MI; MO; NE; NH; ND; OH; OK; SC; SD; UT; WV; and WY the deadline for first dose is **February 13, 2022** and for second dose by **March 15, 2022**.

In addition to vaccination if healthcare professionals are eligible for booster based on the CDC guidelines the CMS mandate requires that we have booster status on file.

IMPORTANT: The situation is fluid and being monitored for further legal developments. Texas has their own Injunction in place and CMS is currently not enforcing the mandate. Please note that some clients may choose to continue implementation despite the preliminary injunction.

Frequently Asked Questions

How does the CMS federal mandate currently impact client and/or state mandates?

All current state and client mandates will remain in effect. There will likely be additional clients that will mandate vaccinations in accordance with the original CMS mandates. Please work with your credentialing analyst to determine if the client/state you are working at has a COVID-19 mandate requirement.

What happens if my current or upcoming assignment has a client or state mandate?

AMN is required to follow all state, federal, and local laws, as well as any client specific regulations. If you are currently on assignment or have a future assignment where there is a mandate in place, you will be required to send in documentation that satisfies the requirements of the mandate.

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Is there a Separate OSHA Mandate?

Additional federal COVID-19 mandates have been issued including the federal OSHA 100+ Employee Emergency Temporary Standard (ETS). The OSHA ETS applies to organizations with more than 100 employees and independent contractors. The OSHA ETS mandate applies where the federal contractor/subcontractor mandates and/or the CMS mandate does not already apply. For most health care organizations, the OSHA ETS Healthcare Professional impact is much less than that of the CMS mandate. The federal government has currently suspended OSHA ETS implementation due to a court order preventing enforcement for the immediate future.

What is AMN Doing to Comply with the Mandate?

To comply with Federal, State, Client and Internal AMN requirements, AMN is working hard to collect vaccination documentation for all Healthcare Professionals who have not yet informed us.

AMN is prioritizing all mandate requests according to the regulatory body (federal, state, local, client) to comply with all processes and protocols.

The need to have accurate data is more important than ever, as we continue to navigate this ever-changing landscape. We appreciate the support in getting updated documentation to us as soon as possible.

What does it mean to be “fully vaccinated”?

Fully vaccinated is defined by the CDC as receiving the second dose in a 2-dose series (e.g., Pfizer and Moderna vaccines) OR receiving a single-dose vaccine (e.g., Johnson & Johnson’s Janssen vaccine) AND a 2-week period having passed since the administration of the last vaccine dose. However, some states and clients are reviewing what “fully vaccinated” means and may interpret being fully vaccinated once eligible as having documentation of booster on file.

What qualifies for a religious or medical exemption?

***Requests for exemption for medical or religious reasons do require additional documentation so that the accommodation request can be reviewed.**

Medical: Letter on Provider letterhead with signature (MD/DO/NP/PA) and/or stamp indicating the medical reason you are not able to receive the vaccine.

Religious: Complete the “Request for Religious Accommodation/Exemption to COVID-19 Vaccination Requirement.” form. All fields need to be completed.

Personal: Many states and clients do not accept personal exemptions. Please work with your Recruiter and Credentialing Analyst to ensure that your assignment location accepts personal exemptions.

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Can Healthcare Providers continue to work post deadlines if documentation is not received?

At AMN, we are looking to have documentation around vaccination status for all healthcare professionals. This includes vaccination card, approved medical or religious exemption + supporting documentation, and booster status where eligible.

Please note this may be subject to change. Our AMN Legal team is working to assess all the mandates, regulations, and information to ensure we are compliant with minimal disruption to our healthcare professionals, our clients and to patient care.

How often will unvaccinated Healthcare Professionals with a valid exemption be subjected to testing?

Unvaccinated Healthcare Professionals may be subject to testing cadences based on Federal, State, Local or Client mandates. Currently, depending on the state and client, we are seeing testing required every other week and up to 2 (two) times per week.

What happens if a Healthcare Professional tests positive for COVID during their assignment?

AMN will follow the CDC and facility guidelines for quarantine, testing and return-to-work protocols. Please call the COVID-19 Hotline at 800-887-1456 where you will be connected to one of our qualified clinical professionals to determine next steps.