



Vendor COVID-19 Vaccination Guidelines

A Resource for Vendors and Regional Health Ministries

March 29, 2022



To Our Business Partners

Our Core Value of Safety means we do everything we can to protect people. That's why Trinity Health requires all colleagues, clinical staff, contractors, and those conducting business in our facilities be vaccinated against COVID-19.

We have strongly encouraged vaccination for all colleagues, and our communities since the first vaccine for COVID-19 was approved for Emergency Use Authorization (EUA) by the U.S. Food and Drug Administration (FDA). But as a health care system, we have a responsibility to do more. With more than 331 million doses administered in the U.S, the vaccines have proven safe and extremely effective against symptomatic infections, hospitalizations, and death. The vaccines are so effective that today more than 99% of people who die from COVID-19 are unvaccinated. **The science is clear that vaccines save lives.**

Vaccination against COVID-19 protects our colleagues, our patients, and the people in our communities--especially the most vulnerable.

In July 2021, we notified all Business Partners – contractors, vendors, and others who conduct business in our facilities that they must be fully vaccinated against COVID-19 or have an approved, religious, or medical exemption. A final notice was sent on September 15, 2021 to remind our Business Partners that all documentation must be in place in order to enter any Trinity Health office, ambulatory, acute, or senior living facility to conduct business.

In November 2021, the Centers for Medicaid and Medicare (CMS) published the Omnibus COVID-19 Health Care Staff Vaccination rule which mandates vaccination of applicable colleagues (to include contracted vendors) who are not subject to a valid medical or religious exemption ([Federal Register :: Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination](#)).

Today, we would like to remind you that we **ALL** benefit when we work together to reduce COVID-19 transmission. We encourage you to review the list of frequently asked questions to fully understand our expectation of accountability for all of us to meet these federally mandated requirements. Our team is here for you should you need further assistance in working through the process to achieve full compliance.

Thank you for your contributions to safety in our locations and communities.

We thank you!

Frequently Asked Questions:

1. Who does the COVID-19 vaccine requirement apply to?

Any vendor who spends time at a Trinity-Health facility is required to be fully vaccinated, except for those who enter a Trinity Health facility for a very brief or infrequent time.

All vendor representatives should be vaccinated or have valid medical or religious exemption with the exception only of those performing infrequent services and tasks in or for an event conducted by "one-off" vendors, volunteers, and professionals (e.g., one-day furnace inspection). Organizations are not required to ensure the vaccination of individuals who very infrequently provide ad hoc non-healthcare services (such as generator testing, equipment maintenance, etc.), or services that are performed exclusively off-site, not at or adjacent to any site of patient care (such as accounting services), but they may choose to extend COVID-19 vaccination requirements to them if feasible. Organizations should consider the frequency of presence, services provided, and proximity to patients and staff.

2. What is meant by fully vaccinated or “up-to-date” on vaccinations?

The Centers for Disease Control and Prevention (CDC) defines fully vaccinated as receiving all recommended doses in their primary series of COVID-19 vaccine. Up to date means a person has received all recommended doses in their primary series of COVID-19 vaccine, and one booster dose when eligible.

The Trinity Health COVID-19 vaccine requirement policy requires all vendors to be fully vaccinated. They must have completed a multi-dose COVID-19 vaccine series or one-dose of a single-dose vaccine prior to entry into a Trinity Health facility OR must have a valid medical or religious exemption. Details may be found at [QSO-22-07-ALL \(cms.gov\)](https://www.cms.gov/medicare/coverage/policies/2020s/qso/qso-22-07-all). Currently, vendors are not required to receive booster(s). HCMS asks that we track booster documentation for our colleagues on a voluntary basis. We ask that our vendors do the same with contracted vendors who are providing patient care within our facilities.

3. Who is responsible for maintaining the vaccination records of representatives calling on Trinity Health ministries?

Ultimately, it is the responsibility of the vendor representatives' company to administer a vaccination program and maintain all associated records.

We have deployed three methods to easily track vendor representatives' status in our Trinity Health locations:

1. All vendor representatives who are providing daily patient care or are within our facilities on a frequent basis are required to upload their vaccination record/exemption into the Reptrax/IntelliCentrics system (excluding those who utilize another method of submission – see #3). Alternatively, if you are providing daily or frequent services and are not in the system, you are required to provide a clear copy of your COVID-19 Vaccination Record Card (to the manager of the department where you are working) prior to the first shift onsite.

2. Vendors who are sporadically in our buildings or visit for shorter timeframes are required to have their organization provide an attestation to the onsite business owner that the representative is meeting or working directly with prior to the vendor representative coming on site. The copy of their vaccination record/exemption is retained on file by the vendor representative's company.
3. Agency nursing and other contract clinical providers who are utilizing another process for submitting vaccination documentation should continue to provide their vaccination status using that system as part of their onboarding process.

NOTE: Vendors are responsible to ensure on an ongoing basis that their representatives are vaccinated and to maintain copies of all records should they be needed by Trinity Health. Same day submission of documents to Trinity Health could be required without notice in the event of a regulatory survey or any other event where vaccination status is required. Current record maintenance is critical. Failure to make documentation available as required could negatively impact the relationship of the vendor with Trinity Health.

4. Will Trinity Health Regional Health Ministries retain copies of records?

Yes, Trinity Health Regional Health Ministries will retain copies of vaccination records and attestations that have been submitted by the vendor, but final accountability remains with the vendor to keep clear records of their personnel. Vendors can expect that Trinity Health **will periodically** request a list of vaccinated representatives who enter our facilities, those who have received approved exemptions, and will calculate vaccination rates as required by CMS.

5. What is required if the vendor representative requests a religious or medical exemption from the COVID-19 vaccine requirement?

Trinity Health will not evaluate the circumstances that created a request for a religious or medical exemption. Vendors are responsible for evaluating exemption requests in accordance with CMS regulation and for ensuring that all medical exemptions are signed and dated by a licensed practitioner with valid medical reason for the exemption. Vendor businesses are further responsible for evaluating and approving any exemption requests based on sincerely held religious beliefs.

Vendor representatives are required to provide exemption documentation or attestations via one of the three methods stated above in FAQ #3.

6. What about vendor representatives who just had COVID-19 and are presumed to have antibodies?

Vendor organizations are responsible to track representatives who are within the 90-day window post illness with COVID-19 and to ensure that these individuals are vaccinated at 90 days post-illness. Documentation should be retained by the employer to validate the representative's COVID-19 episode until vaccination can occur.

7. What is required of the vendor representative who has requested exemption and is scheduled to enter a Trinity Health facility?

Business partners have a responsibility to educate **all** their representatives on standard infection prevention practices including wearing face covering/mask as required, physically distancing, being

screened for symptoms prior to each time they enter a Trinity Health facility, PPE as required, and careful hand hygiene. Business Partners who knowingly plan to send a vendor representative with a medical or religious exemption to a Trinity Health facility are expected to first evaluate whether a fully vaccinated representative could be substituted or, alternatively, whether the visit can be postponed or altered to ensure the individual is not in contact with patient care areas.

8. What actions should be taken if you learn that one of your representatives is not compliant with the regulations?

You should take steps to immediately remove the representative from the facility and substitute with a vaccinated representative. Further, you should immediately notify the facility's Supply Chain Management department and/or the Trinity Health business owner the vendor representative works with.

9. What if one of our representatives is feeling ill or became ill after being in the facility?

Please notify us immediately and have the colleague remain at home and immediately be tested for COVID-19. Contact tracing may need to be initiated.

10. I have additional questions; where can I obtain more information?

Contact SupplyChainRequestsandQuestions@trinity-health.org for any additional questions or concerns.