

Your Organization Masking Policy: Information for Your Consideration

In-office and care staff, as well as patients/clients are likely expecting to know how you are handling the CDC masking guidance for fully vaccinated individuals. The following are considerations abstracted primarily from the CDC for use in reviewing your policy and informing your staff and patients/clients.

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-after-vaccination.html> April 27, 2021 and <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/fully-vaccinated.html> May 16, 2021

CDC Masking Guidelines for Fully Vaccinated Individuals Do Not Apply to Healthcare Settings:

- Healthcare staff should continue to follow all current infection prevention and control recommendations, including those addressing work restrictions, quarantine, testing, and use of personal protective equipment to protect themselves and others from SARS-CoV-2 infection.
- In general, fully vaccinated healthcare staff should continue to wear PPE while providing care/services. *The use of PPE for healthcare staff remains unchanged.*

What We Know Now:

- CDC defines “fully vaccinated” as an individual who is ≥ 2 weeks after the second dose of Moderna or Pfizer vaccines, or a single dose of J&J vaccine.
- COVID-19 vaccines are effective at preventing COVID-19 disease, especially severe illness, and death. The vaccines reduce the risk of people spreading COVID-19.

What We Are Still Learning:

- How effective the vaccines are against variants of the virus causing COVID-19. Early data show the vaccines may work against some variants but could be less effective against others.
- How well the vaccines protect people with weakened immune systems, including people who take immunosuppressive medications.
- How long COVID-19 vaccines protect people.

Recommendations for “Post-Acute” Providers and Their Staff:

- As an employer, you are required to follow federal, state, and local guidance in creating your workplace policy.
- CDC recommends that you maintain a vaccination record and status of all staff.
- Per the Epstein Becker and Green law firm, an employer can ask to affirm employee vaccination of or require proof, what you believe is needed to safely operate your Organization. ecomms@ebg.com
- If your healthcare staff provide care in nursing homes or intermediate care facilities for the intellectually disabled, the facility will likely want to know the vaccination status of your staff who provide care there at least weekly. New regulations are effective for these facilities May 21, 2021 and include weekly reporting of resident and staff vaccination status to the CDC. The regulations can be found at <https://www.federalregister.gov/documents/2021/05/13/2021-10122/medicare-and-medicaid-programs-covid-19-vaccine-requirements-for-long-term-care-ltc-facilities-and>
- CDC advises fully vaccinated staff can socialize together in break rooms and conduct in- person meetings without *source control* or physical distancing. However, if unvaccinated staff are present, everyone should wear source control and unvaccinated staff should physically distance from others.
 - *Source control:* Well-fitting cloth masks, facemasks, or respirators covering your mouth and nose to prevent spread of respiratory secretions when breathing, talking, sneezing, or coughing.

Fully Vaccinated Staff and Testing:

- Anyone with symptoms of COVID-19, regardless of vaccination status, should receive a viral test immediately.
- CDC recommends that asymptomatic healthcare staff with a *higher-risk exposure*, regardless of vaccination status, should have a series of two viral tests for SARS-CoV-2 infection. Testing is recommended immediately and 5–7 days after exposure.
 - *Higher risk exposure* is not wearing appropriate PPE and being within 6 ft of a person for a total of 15 minutes or more in a 24-hr. period, and that person has confirmed COVID-19, or the COVID-19 was confirmed within 14 days of being with that person.
- Fully vaccinated staff providing care in a nursing home may be subject to testing during an outbreak. The federal regulations addressing the scope and frequency of testing are in addition to any state required testing and any facility-specific testing. The federal publication with detail has been updated 4/27/21. <https://www.cms.gov/files/document/qso-20-38-nh.pdf>

Fully Vaccinated Staff Work Restrictions:

- Fully vaccinated staff with higher-risk exposure and who are asymptomatic do not need to be restricted from work for 14 days following their exposure.
- Fully vaccinated staff who travel should continue to follow CDC travel recommendations and requirements, including restriction from work, when recommended for any traveler. <https://www.cdc.gov/coronavirus/2019-ncov/travelers/travel-during-covid19.html> May 19, 2021.

Patient/Client Care

CDC recommends maintaining a vaccination record of all patients.

<https://www.cdc.gov/coronavirus/2019-ncov/hcp/infection-control-after-vaccination.html>: States in part:

“What infection prevention and control practices are recommended when planning for and allowing visitation in post-acute and acute care facilities? (Note: post-acute healthcare facilities includes home healthcare)

- *Facilities should continue to promote and provide vaccination for all HCP.*
- *Post-acute care facilities should continue to encourage vaccination among all new admissions.*
- *Facilities should maintain a record of the vaccination status of patients/residents and HCP...”*
- You might also consider adding the vaccination status of the primary caregiver(s). Information can be obtained upon admission and updated throughout care.
- Present to staff and inform patient/clients and their families/caregivers of the continued risk associated with in-home visits of families and friends. Reinforce the ongoing attention to visiting family or friends if they have:
 - An existing COVID 19 infection; symptoms of COVID-19; or close contact (within 6 feet) of an infected person for a total of 15 minutes or more over a 24-hour period in the prior 14 days.
- Also, CDC recommends following the infection prevention and control recommendations for unvaccinated individuals when caring for fully vaccinated patients with an immunocompromising condition.

CHAP thanks you as a valued partner in keeping your staff and your patients/clients and their families safe.