# LeadingAge® Iowa

# CMS Vaccine Mandate – Staff Tracking Requirements

❖ **Determine the "staff" to include on your tracking/matrix form. Reminder that staff includes employees, licensed practitioners, students, trainees, volunteers, and individuals who provide care, treatment or other services under contract or arrangement. Staff <u>does not</u> include those that work 100% remotely or only provide telehealth services and do not have any interaction with resident or other staff.**

❖ **All "staff" included on your tracking/matrix form <u>must </u>be included in the weekly NHSN HCP & Resident COVID-19 vaccination reporting. This will assist with "reasonable consistency" during comparison of NHSN reporting and tracking data by surveyors, to determine compliance.**

❖ **See also Contractor Analysis for Vaccine Requirement.**

## ALL Staff:

✓ **Document their role, assigned work area(s), and how they interact with residents.**
✓ **Contractors, volunteers, students, volunteers and trainees should be indicated on the tracking/matrix form.**
✓ **Document if a "staff" member works 100% remotely or via telehealth and has no interaction with residents or other staff.**

## Fully Vaccinated:

✓ **Type of vaccine that was received.**
✓ **Dates of administration of the vaccine.**
✓ **Include boosters or additional doses, if applicable (type and date).**

## Partially Vaccinated:

✓ **Type of vaccine that was received.**
✓ **Date of administration of the dose.**
✓ **When the next dose is scheduled to be administered.**

## Medical or Religious Exemption:

✓ **Type of exemption requested.**
✓ **Date of exemption request.**
✓ **Determination (pending/approved/denied).**
✓ **Additional precautions the staff must take.**

## Temporary Delay in Vaccination:

✓ **Criteria met for temporary delay (acute infection secondary to active COVID-19; receipt of convalescent plasma or monoclonal antibodies within the last 90 days).**
✓ **What date vaccination may resume or is scheduled.**
✓ **Additional precautions the staff must take.**

## References:

CMS. *QSO-22-09-ALL, Attachment A, LTC: Guidance for Interim Final Rule-Medicare and Medicaid Programs; Omnibus COVID-19 Health Care Staff Vaccination* (2022, Jan. 14). Attachment A. LTC (cms.gov)