

CITY OF PHILADELPHIA

DEPARTMENT OF PUBLIC HEALTH
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Philadelphia, PA 19107

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October 12, 2021

RE: Updates to Mandatory Healthcare Vaccination

This letter provides time-sensitive updates to specific vaccination mandate timelines and record-keeping requirements for Philadelphia Healthcare Institutions, Healthcare Workers, and Healthcare Institution Workers under the “Emergency Regulation Governing the Control and Prevention of COVID-19 Mandating Vaccines for Healthcare Workers and In Higher Education, Healthcare, and Related Settings (“Vaccine Mandate Regulation”), effective August 16, 2021. The information contained has been excerpted in part from the Department’s “Healthcare and Related Settings Guidance” (“Guidance”) attached to this letter. Guidance has been updated effective October 7, 2021. Please note the following limited changes for specific types of healthcare and healthcare institution workers which are only applicable if employees comply with the updated timing requirements and all Interim Precautions described below and employers comply with all Employer Record Keeping Requirements outlined below.

Timeline Updates

Group One: Group one includes those designated as healthcare workers or healthcare institution workers in the attached guidance that are working in a long-term care facility (LTCF) or hospital. Those individuals who are or will be working in-person shifts in group one before October 15th must have received at least one dose of vaccine of a two-dose vaccination series or the single dose in a one-dose series by October 15, 2021 and comply with all Interim Precautions described below. Final doses must be received by November 15, 2021.

Group Two: Group two includes those designated as healthcare worker or healthcare institution worker in the attached guidance that are NOT working in a hospital or LTCF. Those individuals who are or will be working in-person shifts in group one before October 22nd must have received at least one dose of vaccine of a two-dose vaccination series or the single dose in a one-dose series by October 22, 2021 and comply with all Interim Precautions described below. Final doses must be received by November 22, 2021.

Group Three: All workers hired after the vaccination deadline for their group as designated above must receive at least one shot in a two-dose series or a single dose in a one-dose series before beginning in-person shifts. Second doses must be received one month from the date of hire.

Interim Precautions Required

All workers in Groups One, Two, or Three receiving first doses of a two dose vaccine series according to their respective deadlines indicated above OR receiving the single dose in a one-dose series may continue to work while awaiting full vaccination if: the individual provides documentation to their employer of a scheduled second dose with a pharmacy, community partner, or other medical provider, and;

- the individual is double-masked or uses an KN-95 or similar respirator while working until the second dose is received, and;
- the individual submits to at-least twice weekly antigen or PCR testing for COVID-19, depending upon frequency of their shifts as detailed in guidance

Employer Record Keeping Requirements

Employers of workers in Groups One, Two or Three must complete a written policy detailing how the employer will verify compliance with extended deadlines. Policies must be kept on file and made available for inspection and/or response to requests for information from PDPH. Electronic verification of compliance MUST be self-provided via REDCap survey by the date indicated on the survey, to be separately provided.

Medical or religious exemption requests must follow the requirements laid out in the Regulation and Guidance, including documentation and retention of records. A healthcare institution may delegate responsibility for determining vaccination status, including review and approval/denial of exemption requests of covered contracted individuals or entities to that contracting agency.

Vaccination records must include the following information: numbers of fully, partially, unvaccinated and vaccination status unknown staff/contractors; numbers of staff/contractors with medical or religious exemptions; refused exemption requests and reasons for refusal; and numbers and percentages of turnover due to vaccination mandates, if known. Contracting agencies are responsible for reporting vaccination status of their covered workers to the Healthcare Institution and must maintain all records relating to vaccination status. Please note, this information must not include any confidential information such as names, dates of birth, social security numbers, or employee identification numbers. If employers/contracting agencies are providing testing for employees/contract staff, testing results must be provided to the Department via protocol indicated in Guidance.

Enforcement

Beginning October 16th, 2021, the Department will exercise its inspection authority to review records per Chapter 6-500, Section 501 of the Philadelphia Code. These records must be made available to the Department upon request as dictated by Chapter 6-200, Section 202(4) of the Philadelphia Code and per the June 2020 Sixth Supplemental Emergency Regulation Governing the Control and Prevention of COVID-19 (“Mandatory Data Reporting Order”).” Records will be examined via a future scheduled submission calendar and/or unannounced in-person or electronic compliance audits of records by Department personnel. Method and timeline for unannounced audits will be determined in part by information reported to the (CDC) National Healthcare Safety Network (NHSN) system and may be required in response to complaints received against an institution. Failure to comply may result in remediation planning or immediate penalties. These may include fines up to \$2000 per violation, per day, under Chapter 6, Section 103(2) of the Philadelphia Code, depending on the severity of the failure and the level of risk to patients, clients, staff, and the general public.

Thank you for your attention to this very important matter. The Department looks forward to working with you to secure the health and safety of all Philadelphians. For questions or concerns regarding this information, please call (215) 685 - 5488 or email covid@phila.gov.

Sincerely,

Division of COVID Containment
Philadelphia Department of Public Health