

Vaccine Requirement Exploratory team recommendations Related to anticipated COVID-19 vaccination requirement for PCC employees and / or students

AUTHORS: Greg Pitter - IT Application Services Director, Karen Sanders - Pathway Dean, Theresa Payne - Office of Equity and Inclusion Equity Investigator, and Angela McMahon - COVID-19 Reopening Director.

CURRENT STATE: In recent weeks students and employees in our healthcare programs, as well as PCC employees who work at or visit K-12 settings, Corrections, and Department of Human Services facilities have come under vaccine mandates through Oregon Administrative Rules or Executive orders. *Through responding to these requirements we have gained insight and developed tools and systems that can be applied to a broad vaccination requirement.*

ASSUMPTIONS: A COVID-19 vaccination requirement from PCC's board, Oregon Governor Kate Brown, the Oregon Health Authority, Oregon OSHA, or Federal OSHA is likely to impact PCC broadly in the coming weeks. Such a mandate from an external body will include definitions, a timeline, and requirements.

EXCEPTIONS: "Exceptions" is the language being used by OHA for COVID-19 vaccination, rather than "exemptions" which is the language commonly associated with immunizations, so we have adopted the word "exceptions" for this report. ([background](#))

PCC is using the [Oregon Health Authority forms and process for exceptions](#). It is important to note that medical exceptions must be accompanied by certification by a healthcare provider. Exception requests are reviewed on an individual basis for qualification. Employee requests are processed by Human Resources and student requests are reviewed by directors or deans in their academic programs, for religious exceptions, and by Disability Services for medical exceptions.

PRELIMINARY DATA ON EXCEPTION RATES: Based on a survey of 400 students in our healthcare programs, the intent to request exception is about 5% - nearly all are religious exceptions. For 100 employees surveyed in healthcare and K12, the rate of those expressing intent to request exception is about 4% split between medical and religious. Due date for exception requests is later this month so the rate of completed exceptions may be smaller.

LESSONS LEARNED: In interviews with Portland State University, Pacific University, and Lane Community College - institutions who are early in their implementation of a vaccine mandate - there were no best practices nor clear data about the impact of the requirement on enrollment. In one case implementation has been halted.

One common finding: meeting the legal requirement for proof of vaccination has proven to be incredibly time consuming. OHA definition states "Proof of vaccination" means documentation provided by a tribal, federal, state or local government, or a health care provider, that includes an individual's name, date of birth, type of COVID-19 vaccination given, date or dates given, depending on whether it is a one-dose or two-dose vaccine, and the name/location of the health care provider or site where the vaccine was administered. Documentation may include but is not limited to a COVID-19 vaccination record card or a copy or digital picture of the vaccination record card, or a print-out from the Oregon Health Authority's immunization registry."

Recommendations for today

- A vaccination mandate from an external body will include definitions, a timeline, and requirements. Hold further work until these "knowns" are firmly established

- Create a steering team including the authors of this report and representatives from HR, the Federations, CTE faculty, Healthcare faculty, Enrollment Services including Financial Aid, Student Affairs Administration, Student Conduct and Retention, Disability Services, Academic Affairs administration, and Information Technology
- Brief and prepare stakeholders across Academic Affairs, Student Affairs, Information Technology, and other affected divisions of the College for the potential disruption of a mandate, particularly if one comes with a short deadline. Preparations should be made to deal with the potential impacts to instructor class assignments, financial aid eligibility, and delay of other projects if resources have to be dedicated to implementing and communicating a mandate, among others
- Review vendors and technical solutions to become familiar with available features and costs ●

Continue research into capacity and functionality of our existing systems for immunization tracking

- Identify executive sponsor and dedicate FTE to coordinating and leading this work, plus additional workforce if students are required to be vaccinated
- Lobby the Governor and Oregon Health Authority to improve functionality of Oregon's ALERT Immunization Database. Today it is limited to one-name-at-a-time searches

Recommendations to respond to the vaccine requirement(s), once known

- Develop an implementation plan with timeline and clear outcomes
- Develop work groups from steering team + key subject matter experts
 - Systems / process / procedure
 - Policy implications
 - Technical implementation
 - Student & academic affairs combined team for
 - Faculty - workload & employment implications
 - Students - academic implications if unable to complete
 - Communication & change management

- Invest time to develop a clear and thoughtful communication plan

- Unless required, by external mandate, follow established medical and religious exceptions workflows ●

Unless required by external mandate, accept all fully completed medical and religious exceptions requests

- Avoid a system that includes the upload of vaccination cards. Digital image storage is complex and adversely impacts the performance of the network. Lean toward simplicity
- Collect vaccination type data (Moderna, Pfizer, J&J) so that we have capacity to respond should boosters be required later