

# Vaccinated-Employee Exceptions Guidance:

## Masking and In-person Meetings

Existing COVID-19 practices and protocols, including masking, distancing, capacity limits, and other restrictions were put into place over the last year to keep patients, staff, and our community safe. With the latest guidance issued from federal, state, and local officials, St. Lawrence Health is ready to update these standards and practices. These changes signal recognition of high system-wide vaccination rates and low COVID-19 infection rates within our community.

**ATTENTION: MASKING POLICIES ARE STILL IN EFFECT. PLEASE VISIT THE SLH [EMPLOYEE COVID-19 TOOLKIT](#) FOR THE LATEST COVID-19 POLICIES AND PROCEDURES.**

The Occupational Safety and Health Administration (OSHA) recently published an emergency temporary standard (ETS) for occupational exposure to COVID-19 as an interim final rule in the Federal Register. The ETS requires health care employers to implement policies and procedures to protect their workers in settings where suspected or confirmed COVID-19 patients are treated.

Further, the ETS states that, in well-defined areas, such as meeting spaces, where there is no reasonable expectation that any person with suspected or confirmed COVID-19 will be present (“**Designated Spaces**”), the ETS exempts fully vaccinated workers from the rule’s masking, distancing, and barrier requirements (“**Vaccinated-Employee Exceptions**”). The examples of well-defined areas of a workplace described in the ETS are certain finance office settings, administrative office settings, or staff meeting areas that are separated and apart from any clinical areas. In order to appropriately comply with this Vaccinated-Employee Exception, employers are required to determine where such well-defined areas exist and must have a process for determining which employees are vaccinated. Additionally, the employer must provide reasonable accommodations to employees who have not yet been or are unable to be vaccinated, in a way that does not expose the employee to COVID-19 hazards (e.g., meeting attendance via telephone, Webex, Zoom, etc.).

The following sites/areas have been deemed Designated Spaces:

### **Canton-Potsdam Hospital**

Hospital campus, Conference Rooms A & B  
Hospital campus, Classroom  
Hospital campus, Administration Conference Room  
Hospital campus, Executive Suite  
Hospital campus, Physician’s Mail/Conference Room

### **Gouverneur Hospital**

Hospital campus, Board Room  
Hospital campus, East Wing Community Room  
Hospital campus, Executive Suite

### **Massena Hospital**

Hospital campus, Board Room  
Hospital campus, Community Education Room  
Hospital campus, Executive Suite

## **PPM**

EJ Noble building, Betty Evans Room  
Lawrence Avenue building, Community Room  
Medical Campus building, Board Room

## **Administrative Sites**

EJ Noble Finance Department Conference Rooms and Offices  
SeaComm Finance Department Conference Rooms and Offices  
200 Cottage Building, Top floor Conference Rooms and IS Offices  
13 Grove Street, Conference Rooms and Offices  
Lamar Building, Conference Rooms and Offices other than Occupational Health

In order to comply with the Vaccinated-Employee Exceptions, whomever is calling and/or managing the in-person meeting or Designated Space must conform to the following requirements:

1. Ensure that you are operating in a Designated Space
2. Ensure that all in-person attendees have been fully vaccinated by verifying attendees' "Crush COVID-19" badge stickers. No sticker, no exception.
3. Enable a virtual or telephone options for unvaccinated attendees.

Hosting a mask-free meeting without complying with the three (3) requirements referenced above is cause for disciplinary action.

We anticipate expanding upon the list of Designated Spaces in the near future.

## **Frequently Asked Questions:**

### **Q. Is masking and physical distancing still required after I've been vaccinated?**

Generally, yes. Masking and physical distancing is still required in all clinical areas, and in any location where patients or visitors will see you or may come into contact with you. This means greeter stations, nursing stations, and other workspaces embedded in outpatient and inpatient care areas where patients and visitors pass by must be masked at all times.

### **Q: What is the point of issuing vaccine badge stickers?**

Similar to masking practices during the flu season, identifying staff who have been vaccinated helps ensure that masks are used when required. The goal is to keep patients, staff, and our community safe; as well as comply with all federal, state, and local guidance/regulations.

### **Q: Do I have to wear a sticker on my badge?**

No. Staff have the choice of wearing a "CRUSH COVID-19" sticker on their badge. However, Staff without a sticker will be expected to adhere to "unvaccinated" infection prevention policies, procedures, and maintain appropriate socially distancing and remain masked at all times while at SLH.

**Q: I am vaccinated but feel more comfortable wearing a mask – is that ok under this new policy?**

Yes. There are many reasons people may prefer to continue to wear a mask. All individuals, regardless of vaccination status, will be supported if they choose to wear a mask. Please remember, if you're choosing to don an N-95 respirator, please make sure you are fit tested to that particular brand and model. Please ask your supervisor how to sign up for fit testing.

**Q. How can unvaccinated staff safely attend a meeting if others are unmasked?**

Unvaccinated staff should wear a mask fully covering their mouth and nose, and maintain appropriate social distancing with others. Furthermore, unvaccinated staff may not attend in-person meetings in Designated Spaces where Vaccinated-Employee Exceptions are being exercised. Un-vaccinated employees should reasonably be accommodated with either telephone or virtual meeting options.

**Q. Does this new protocol mean groups of staff can eat together without masks and physical distancing?**

Unvaccinated individuals are at the highest risk while eating, especially when eating around other unmasked individuals. Unvaccinated staff should eat where they can maintain the appropriate social distancing from others. Vaccinated staff can eat next to each other but should still be mindful of good hand hygiene and other infection prevention protocols. ALL staff, regardless of vaccination status should NOT eat in patient care areas. Unvaccinated staff may not eat in Designated Spaces where Vaccinated-Employee Exceptions are being exercised

**Q. I'm a manager and want to begin in-person meetings. What protocols should I follow?**

Masking policies are still in place. All staff are required to wear masks in any location in or near patient care areas, or areas where patients are likely to be encountered. For meetings held in locations remote from patients, all staff will be expected to maintain appropriate social distancing and remain masked at all times. Vaccinated staff need not mask in Designated Spaces if all the requirements for the Vaccinated-Employee Exceptions are met.

**Q. Am I required to offer a remote option for all meetings?**

Yes, you should continue to offer remote meetings at this time. As demonstrated during the pandemic, offering hybrid options may contribute to productivity, efficiency and employee satisfaction.

**Q. My provider team wants to meet in a conference room on a patient care unit. No patients will enter the conference room. May vaccinated staff remove masks for the meeting?**

No. All staff must remain masked in any room on a patient care unit, even if patients themselves may not be present in the room.

**Q. Is there a # limit to how large of a meeting I can hold in person?**

The capacity of meetings should be determined based on the ability to maintain appropriate social distancing among attendees in a particular space.

**Q. May I hold a retreat outdoors if the group has a mix of vaccinated and unvaccinated individuals?**

Yes. You may hold a retreat outdoors. Unvaccinated staff should be masked while participating in a group activity; vaccinated staff need not mask.

**Q. If my fully vaccinated coworkers and I work in a non-clinical setting and we are routinely unmasked while working, should we mask when someone walks into the office (e.g., EVS, Facilities, Vendor, etc.) and physically distance?**

If distancing cannot be maintained with the person of unknown vaccination status, masking is required for all.

**Q. Do I have to wear a mask when I am outside walking to my car?**

No. Open-air or parking garages with open sides are considered outside spaces. However, masks should be worn within completely walled-in garages if social distancing cannot be maintained.

**Q. If I am fully vaccinated, can we unmask in lobbies, lounges, or other public spaces?**

No. You must remain masked in any public location where patients are likely to be encountered.