

# + Policies and Procedures Manual

## *Policy: COVID-19 Vaccination Program*

---

### **Policy**

LifeStream's Communities ("Community" or "Communities") will implement policies and procedures to minimize the risk of acquiring, transmitting or experiencing complications from COVID-19 (SARS-CoV-2) by offering our Residents and Associates the COVID-19 vaccine.

### **Definitions**

- *Associates – unless otherwise designated by levels of care or based on licensure by the Arizona Department of Health Services, the term “Associates” will be used to describe all staff members who are directly employed by LifeStream Complete Senior Living or who are employed by a third-party contract but act in the capacity of a LifeStream staff member.*
- *Community or Communities - In all cases, the use of the terms “Community” or “Communities” refers to LifeStream operations and does not include communities-at-large (such as cities, counties or states) unless expressly stated.*
- *Emergency Use Authorization (EUA) – a mechanism to facilitate the availability and use of medical countermeasure, including vaccines, during public health emergencies, such as the current COVID-19 pandemic. The EUA process is a way to ensure safety while still expediting approval in emergent situations.*
- *Medical Contraindication - a condition or risk that precludes the administration of a treatment or intervention because of the substantial probability to harm to the individual may occur.*
- *Residents – unless otherwise designated, the term “Residents” will generally refer to LifeStream Residents living in a licensed community (Assisted Living or Skilled Nursing). The term generally does NOT apply to those Residents living in Independent Living.*

### **Policy Explanation and Compliance Guidelines**

1. LifeStream Communities, in collaboration with the Medical Director, will provide an immunization program against COVID-19 disease in accordance with national standards of practice.
2. COVID-19 vaccinations will be offered as per CDC and/or FDA guidelines unless such immunization is medically contraindicated, the individual has already been immunized during this time period, or refuses to receive the vaccine.
3. Residents will be screened for current suspected or confirmed cases of COVID-19, previous allergic reactions and administration of therapeutic treatments and services to determine if they are an appropriate candidate for vaccination. Associates should seek guidance from their healthcare provider to determine if they are an appropriate candidate for vaccination.

4. Following assessment for potential medical contraindications, COVID-19 vaccinations may be administered in accordance with physician-approved “standing orders”.
5. LifeStream Communities will not administer the vaccine directly, but will coordinate with local providers to make the vaccine available to Associates and Residents. Transportation will be provided when necessary to facilitate receipt of the vaccine.
6. Upon request, a copy of the Emergency Use Authorization (EUA) For Recipients and Caregivers for the available vaccines will be given to Associates, Residents or Resident representatives. The vaccine provider will also provide copies of appropriate vaccine information.
7. Residents or their representatives will sign a consent form prior to the administration of the COVID-19 vaccine, in addition to any documentation required by the vaccine provider. The consent will be retained in the Resident’s medical record.
8. LifeStream will, as appropriate, provide visual presentations or oral explanations to assist vaccine recipients in understanding the benefits and potential side effects of the COVID-19 vaccine.
9. Residents, Resident representatives and Associates retain the right to accept, refuse or change their decision about COVID-19 immunization. If refused, the Residents and Associates will adhere to the protocols set forth by specific Community policies.
10. The Resident’s medical record will include documentation of the following: that the Resident and/or the Resident’s representative was provided education regarding the risks, benefits and potential side effects of immunization; each dose of the vaccine administered to the Resident; if the Resident did not receive the COVID-19 vaccine due to medical contraindication or refusal; and, follow-up monitoring of the Resident post-vaccination.
11. Associate documentation related to the COVID-19 vaccination will include the following: documentation of education to the Associates regarding the risks, benefits and potential side effects of the COVID-19 vaccine; information on obtaining the vaccine; and, the vaccine status of Associates (and other related information as required to meet mandatory reporting requirements).
12. The Community will continue to practice transmission-based precautions and other infection control practices post immunization according to CDC and CMS guidelines.
13. In case of lack of availability of the COVID-19 vaccine, or other issue with the availability leading to an inability to implement the COVID-19 vaccine program, the Community will demonstrate:
  - a. Documented efforts to identify providers who can administer the COVID-19 vaccine and contact with Public Health for assistance as needed.
  - b. Plans are developed on how and when the vaccines are to be administered.
  - c. Residents have been screened to determine how many and which Residents are eligible and wish to receive the vaccine; and
  - d. Education regarding immunizations has been implemented.
14. Inquiries concerning our immunization program should be directed to the Communities’ Executive Directors and/or Administrators.
15. While inactive vaccines do not interfere with tuberculosis (TB) skin test results, there is no data as to the impact of COVID-19 mRNA vaccines on either TB test for infection, therefore, the Community will consider the following recommendations based on CDC guidance:

- a. For Associates or Residents who require baseline TB testing (at onboarding or entry into the Community) at the same they are to receive an mRNA COVID-19 vaccine:
  - (a) Perform TB symptom screening on all Associates and Residents.
  - (b) If utilizing the interferon gamma release assay (IGRA), draw blood for the IGRA prior to COVID-19 vaccination.
  - (c) If utilizing the Tuberculin Skin Test (TST), place prior to COVID-19 vaccination.
  - (d) If vaccination has been given and testing needs to be performed, defer TST or IGRA until 4 weeks after COVID-19 vaccine 2-dose completion (all potential recipients of COVID-19 vaccination should weigh the risks and benefits of delaying TST/IGRA with their healthcare providers).
- b. For Associates who require testing for other reasons:
  - (a) Perform TB symptom screening.
  - (b) Test for infection should be done before or at the same time as the administration of COVID-19 vaccination. If this is not possible, prioritization of test for TB infection needs to be weighed with the importance of receiving COVID-19 vaccination based on potential COVID-19 exposures and TB risk factors.
    - (i) Associates with high-risk conditions for TB progression should be fully evaluated as soon as possible.
    - (ii) Associates without high-risk conditions for TB progression should proceed with contact tracing (i.e., symptom screening, chest radiograph or other imaging, specimen for microbiologic evaluation) but delay the test for TB infection (TST or IGRA) if prioritized for receiving COVID-19 vaccination (all potential recipients of COVID-19 vaccination should weigh the risks and benefits of delaying TST/IGRA with their healthcare providers).

**Medical Director Signature**

I hereby authorize this policy: *COVID-19 Vaccination Program*

Michael Newcomb, MD

Name (Print)

Michael Newcomb, MD

Signature

6/25/21  
Date