



November 20, 2021

## The CMS Vaccine Mandate for health care workers

Pershing General Hospital – Critical Access Hospital, is required to comply with the Centers for Medicare and Medicaid Services regulations including the CMS Omnibus COVID-19 Health Care Staff Vaccination Interim Final Rule as a condition of participation. All healthcare workers who work for facilities who receive Medicare and Medicaid funding must comply with the mandate or risk losing CAH designation and funding. This means that all personnel who work, volunteer, or contract with PGH will be required to receive their first dose of the vaccine by December 5, 2021. The Board of Trustees approved the PGH COVID-19 Vaccination Policy on November 18, 2021 at their regular Board meeting. This is an internal policy for staff which outlines the compliance required for employment as well as guidance for two exemptions that will be considered for those unvaccinated individuals who request them – Medical or Religious. Exemption requests will be reviewed and reasonable accommodations will be considered by the Human Resources Department in accordance with the laws governing such for employers. If an employee does not submit a qualified exemption and simply does not want to get the vaccine, they will be ineligible for employment in compliance with the mandate. The policy will allow for process, appeal and dispute in accordance with current employer policies and that information will be provided to the employee by the Human Resources Department.

For more information on the Interim Final Rule, see the links below:

<https://www.cms.gov/files/document/cms-omnibus-covid-19-health-care-staff-vaccination-requirements-2021.pdf>

<https://www.federalregister.gov/documents/2021/11/05/2021-23831/medicare-and-medicaid-programs-omnibus-covid-19-health-care-staff-vaccination>

## What is a Critical Access Hospital?

Critical Access Hospital is a designation given to eligible rural hospitals by the Centers for Medicare & Medicaid Services (CMS). Congress created the Critical Access Hospital (CAH) designation through the Balanced Budget Act of 1997 ([Public Law 105-33](#)) in response to over 400 rural hospital closures during the 1980s and early 1990s. Since its creation, Congress has amended the CAH designation and related program requirements several times through [additional legislation](#).

The CAH designation is designed to **reduce the financial vulnerability** of rural hospitals and **improve access to healthcare** by keeping essential services in rural communities. To accomplish this goal, CAHs receive certain benefits, such as cost-based reimbursement for Medicare services. (see [What are the benefits of CAH status?](#))

Eligible hospitals must meet the following conditions to obtain CAH designation:

- Have 25 or fewer acute care inpatient beds

- Be located more than 35 miles from another hospital (exceptions may apply – see [What are the location requirements for CAH status?](#))
- Maintain an annual average length of stay of 96 hours or less for acute care patients
- Provide 24/7 emergency care services

### **Why is the Critical Access Hospital designation important for Pershing County?**

PGH provides essential medical care to our community with funding from CMS. Without this funding, this facility would not be able to care for those who are unable to seek medical attention outside our community whether it's because they have no support, financial issues or, what some might take for granted, lack of transportation and simply put, the need for emergent care for cardiac or respiratory arrest, stroke, motor vehicle accidents as well as chronic care management in our clinic. PGH's patient mix is approximately 1/3 Medicaid, 1/3 Medicare and the remainder are commercial or other private/self-pay. Our basic services are important to many residents in our community. If the community were to grow, our services would most likely grow, but not without the assistance of cost reimbursement from CMS. As much as we would like to be in the black with regard to our financials, we are happy to maintain a budget neutral position as long as we can continue to provide for our community.

### **We want to be healthy to care for you**

Mandating the vaccine will lead to a higher staff vaccination rate, but it remains unknown how many health care workers it will prompt to leave the industry as a whole. Our hospital and clinic filled with higher than usual sick patients over the past year and a half. This recent surge of patients comes as the health care industry's workforce is already stretched from the crisis. Every local hospital leader will tell you the same thing: It is the most severe staffing challenges we have seen in our lifetimes and relief is not yet in sight. Many of our team members train for years for their roles and expanding that technical experience cannot happen overnight. Currently, about 19% of our staff in all areas of the hospital remain unvaccinated. Vaccinating our employees allows us to maintain a healthy workforce available for the community's health care needs as this pandemic continues. We don't want to see our employees suffer severe complications or even death from COVID. As we have learned repeatedly during this pandemic, we must be flexible and adapt as circumstances require. We will work to implement this mandate on the timeline the government has issued and continue quality care for our most vulnerable patients and community.

### **Where can I get the vaccine?**

If you would like to get vaccinated, please call our Clinic at 775-273-2621 x1.

In closing, we are sincerely and truly compassionate about the work we do for you and we want that to continue.

Sincerely,

Cynthia Hixenbaugh, Administrator/CEO  
 Charles Safford, Chair Board of Trustees  
 Ted Bendure, Vice Chair Board of Trustees  
 Dana Tueller, Secretary Board of Trustees  
 Jayce Montes, Member Board of Trustees  
 Phillip Dickerman, Member Board of Trustees