



**To:** Carter BloodCare Customers  
**From:** Hospital Relations  
**Date:** December 16, 2021  
**Re:** Medicare Conditions of Participation (COPs) and the COVID-19 vaccine mandate

## **Background**

On November 4, 2021, the Centers for Medicare & Medicaid Services issued the COVID-19 health care staff vaccination interim final rule requiring the vaccine mandate which applies to facilities regulated under the Medicare conditions of participation. As a result of this requirement, many of you have requested that couriers delivering blood and blood components submit documentation of vaccination. While CMS has provided an answer as to whether vendors are also held to the same requirements, we do not feel that there is a clear definition for couriers, as we are not providing care, treatment or other services.

*New as of 11/18/21 - Q: What are the documentation requirements for staff vaccinations? Are these the same for vendors?*

*A: As noted in the rule, this vaccination requirement generally applies to eligible staff working at a CMS-certified facility that participates in the Medicare and Medicaid programs, regardless of clinical responsibility or patient contact. The requirement includes all current staff as well as any new staff who provide any care, treatment, or other services for the covered facility and/or its patients. This also includes facility employees, licensed practitioners, students, trainees, and volunteers. Additionally, individuals who provide care, treatment, or other services for the facility and/or its patients under contract or other arrangements must be vaccinated. (Full document can be read here:*

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

Additionally, CMS has issued confirmation via memorandum (December 2, 2021) that it has “suspended activities related to the implementation and enforcement of this rule pending future developments in the litigation.” while it remains enjoined. Carter BloodCare is working on how Carter BloodCare can comply with each individual facility request.

## **Impact to Clients**

At this time, if a courier is required to show proof of COVID-10 vaccination, we will not be able to deliver the blood components to the blood bank or transfusion service and must drop-off at an alternative location, i.e. the facility entrance or loading dock.

## **Client Action Required**

You should be prepared to pick up blood and blood components outside of the blood bank or transfusion service.

**Questions and Additional Information:**

Please contact [hospitalrelations@carterbloodcare.org](mailto:hospitalrelations@carterbloodcare.org) with any concerns.