

Title:	Mandatory Influenza Vaccination Policy	Section:	Administration
Purpose:	<p>Influenza has by far the highest rates of mortality among vaccine-preventable diseases in the US, outpacing all other vaccine preventable diseases combined. Hospitalized patients are more vulnerable to influenza than members of the general population. Many studies show that vaccination of healthcare workers reduces the risk to patients since healthcare workers are frequently implicated as the source of influenza in healthcare settings;</p> <ul style="list-style-type: none"> • Patient mortality goes down when healthcare workers receive flu vaccination. (Carman, Haywood, Potter) • Health care workers and health care systems have an ethical and moral responsibility to protect vulnerable patients from transmissible diseases; • The most effective strategy for preventing influenza is annual vaccination. <p>Given the importance of these issues, and in anticipation of the next influenza season, MedStar Health’s clinical leadership charged a system-wide group of specialists, including physicians and nurses specializing in infectious disease and epidemiology, to study these issues and concerns and to make recommendations as to how MedStar Health can best safeguard its patients from contracting influenza. This group, the MedStar Healthcare Epidemiology and Infection Control (HEIC) Task Force, after reviewing the scientific evidence and based on the collective experience and knowledge of the members of the HEIC, have recommended that a policy of mandatory influenza vaccination be implemented system-wide within MedStar. The Vice Presidents of Medical Affairs Council (VPMA Council) has endorsed this recommendation as vitally important to patient safety and public health.</p>	Number:	
Forms:	Influenza Vaccination Exemption Request Form	Effective Date :	

Policy

Effective immediately all MedStar Health associates and all other individuals identified by description below in the Section entitled “Scope of Policy” must be vaccinated annually against influenza unless they are eligible for and have an approved medical contraindication or an approved religious restriction. All persons covered under this policy must show proof of influenza vaccination in a manner acceptable to MedStar Health in accordance with a schedule to be issued by MedStar Health in advance of each annual flu season.

Medical contraindications include:

1. Severe life or health threatening allergies;
2. Severe documented egg allergy;
3. Severe allergy to any vaccine component;
4. Individuals with a history of Guillain-Barre Syndrome.

Any individual seeking to be exempted from this policy by virtue of a medical contraindication or a religious restriction must submit their request in writing together with documentation supporting the need for the exemption. Each request for exemption will be reviewed by Employee/Occupational Health or the VPMA and, as appropriate, Human Resources and the MedStar Health Legal Department in accordance with applicable law to determine whether the individual qualifies for exemption and/or alternative accommodations under this policy.

Scope

This policy applies to all MedStar Health associates, medical staff members, other credentialed professionals, residents (employed and affiliated), volunteers, students, contractors, and all vendors who work for, provide services to or otherwise do business with MedStar Health or any of its subsidiaries while on MedStar Premises (collectively, these individuals are referred to as “covered individuals”). Professionals visiting MedStar premises for short term events (e.g. consultants to administration, Grand Rounds presenters) will be excluded from this policy.

Definitions

- 1. MedStar Health Associate**
Any individual employed by MedStar Health, Inc. or any of its affiliated organizations.
- 2. MedStar Health**
MedStar Health, Inc. and each of its affiliate or subsidiary companies or businesses.
- 3. Influenza Season**
The period of time determined by the Center for Disease Prevention and Control (CDC) or local health department. This also includes any period of time relating to novel strains of influenza.
- 4. MedStar Premises**
Any building, property, parking lot or site owned, leased, rented or operated by MedStar Health or any of its affiliates or subsidiaries.
- 5. Designated Vaccination Period**
That period of time established each year by the office of the MedStar Executive Vice President for Medical Affairs during which all persons covered under this policy are required to be vaccinated against the influenza, provide proof of their vaccination, or in the alternative qualify for exemption under this policy.

Requirements and Guidelines for Implementing the Policy

- 1. Associates, Board Members, Volunteers**
Employee/Occupational Health at each MedStar site will be available at the start of and during each Designated Vaccination Period to provide vaccinations to associates and board members and volunteers, as designated in this policy. Associates, board members and volunteers may choose to be vaccinated outside of Employee/Occupational Health, provided that they submit written proof of vaccination to Employee/Occupational Health. Proof must include the person’s name, proof of vaccination, date, location and name of the provider.
- 2. Applicants**
At the time of application, potential new hires and volunteers will be notified of MedStar Health’s mandatory influenza vaccination policy. If an applicant is hired, he/she must obtain a vaccination through Employee/Occupational Health during the Influenza Season, show proof of having received the vaccination elsewhere, or receive an exemption under this policy.
- 3. Students, Contract Staff, Independent Contractors, and Vendors**
These individuals and/or their schools or employers will be notified directly of the mandatory influenza vaccination program requirements, and they will be informed of the acceptable forms of compliance certification. These individuals are responsible for obtaining their vaccinations at their cost, unless otherwise specifically stated in writing by MedStar Health.
- 4. Medical Staff Members, Other Credentialed Professionals, Residents and Medical Students**
This policy applies to all members of the medical staffs of MedStar Health institutions, including physicians and other credentialed professionals, as well as residents, fellows, and medical students who provide patient care for or through MedStar Health at any location. Medical staff members, other

credentialed professionals, residents and medical students can be vaccinated by Employee Health/Occupational Health during the Designated Vaccination Period, or may choose to be vaccinated outside of Employee/Occupational Health, provided that they submit written proof of vaccination to the Medical Staff Office or GME office. Proof must include the individual's name, proof of vaccination, date, location, and the name of the healthcare provider.

5. Residents may not provide vaccinations or proof of vaccination for anyone covered under this policy.

Responsibilities

1. Management

- 1.1. Help ensure compliance with this policy
- 1.2. In accordance with business operations and relationships, help to ensure that covered individuals are provided with information relating to the mandatory influenza vaccination policy and its requirements.
- 1.3. Be sensitive to covered individuals when communicating and enforcing this policy.
- 1.4. Encourage and assist covered individuals to obtain information about the influenza campaign from Human Resources and/or the Employee/Occupational Health departments.
- 1.5. Contact Human Resources, the Medical Staff Office or GME for advice on handling situations where covered individuals are not compliant with this policy.

2. Associates and Volunteers

- 2.1. Associates and volunteers are expected to be familiar with and adhere to this policy.
- 2.2. Respectful compliance with this policy is the responsibility of all associates and volunteers.
- 2.3. Associates and volunteers requesting a medical exemption from this policy must submit written proof of medical contraindications to the Employee/Occupational Health Department. Similarly, associates and volunteers seeking a religious exemption must submit appropriate certification of religious restrictions to Human Resources.

3. Medical staff members, Other Credentialed Professionals, Residents and Medical Students

- 3.1. Medical staff members, credentialed professionals, residents and medical students are expected to be familiar with and adhere to this policy.
- 3.2. Respectful compliance with this policy is the responsibility of all medical staff members, credentialed professionals, residents and medical students.
- 3.3. Medical staff members, credentialed professionals, residents and medical students requesting a medical exemption from this policy must submit written proof of medical contraindications to the Vice President of Medical Affairs. Similarly, individuals seeking a religious exemption must submit appropriate certification of religious restrictions to the Medical Staff Office or the GME office.

4. Vendors, Non-Medical Students and Contractors

- 4.1. Must provide proof of vaccination that includes name, proof of vaccination, date, location and health care provider name during the Designated Vaccination Period.

5. Medical Staff Office and Graduate Medical Education (GME) Office Staff

- 5.1. Accepts and processes proof of vaccination and refers exemption requests to the VPMA.
- 5.2. The Medical Staff Office maintains records of compliance for physicians and other credentialed professionals.
- 5.3. The GME Office maintains records of compliance for residents and medical students.
- 5.4. Assists with and encourages compliance by physicians, credentialed professionals, residents and medical students.

6. Human Resources & Employee/Occupational Health

- 6.1. Help to ensure that covered individuals receive information relating to the mandatory influenza vaccination policy and its requirements, during and after the Designated Vaccination Period in order to maximize compliance with the Policy.
- 6.2. Provide assistance to management and associates in ensuring compliance with this policy and otherwise serve as a resource for information.
- 6.3. Intervene, as appropriate and necessary, in situations where this policy is being violated in an effort to promote compliance.

- 6.4. Assist with evaluation and processing of requests for religious exemption.
- 6.5. Employee/Occupational Health maintains records of compliance for associates.

7. Infection Prevention and Control

- 7.1. Help to ensure that covered individuals receive information relating to the mandatory influenza vaccine policy and its requirements.
- 7.2. Provide assistance to management and associates in ensuring compliance with this policy and otherwise serve as a resource for information.
- 7.3. Provide consultation, information and assistance to patients, their visitors and families.
- 7.4. Provide consultation and information to physicians and other healthcare providers providing clinical services to our patients

What Constitutes Non-Compliance: Examples include, but are not limited to the following:

1. Refusal to obtain the influenza vaccine when required, provided that an exemption does not apply.
2. Refusal to complete and return the Exemption Form.

Consequences of Non-Compliance

1. Associates who fail to comply with this policy by the end of the Designated Vaccination Period will be suspended without pay for one week, during which they may comply and return to work. If an associate remains non-compliant at the end of the suspension period, the associate will be terminated from employment.
2. Medical staff members and other credentialed professionals who fail to comply with this policy may have their privileges administratively suspended until they provide proof of compliance or until the end of the influenza season.
3. Residents who fail to comply with this policy may be subject to disciplinary action up to and including dismissal per GME academic policies.
4. Non-compliance with this policy can result in the termination of a relationship with contracted staff, vendors and volunteers-
5. Students, volunteers, contractors and vendors will not be allowed on MedStar Premises during the influenza season if they have not received an influenza vaccination during the Designated Vaccination Period.

Related Policies

1. Accommodating Individuals with Disabilities
2. Job Performance Management
3. Employee/Occupational Health Policies & Procedures (need specific policy)
4. IPAC Policies & Procedures (need specific policy)
5. Resident Misconduct Policy

Right to change or terminate policy

This policy should be modified with the advice of Infection Prevention and Control, Human Resources and Employee/Occupational Health, and pursuant to the review and approval of the Legal Department. The entity's policies are the purview of the Chief Executive Officer (CEO) and the CEO's management team. The CEO has the final sign-off authority on all corporate policies.

References related to Policy

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