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Owner Elizabeth Kang:
Human
Resources
Compliance
Manager

Area Employee Health
Applicability Memorial
Healthcare
System

### **EH-18 Influenza Vaccination**

## **POLICY**

The purpose of these guidelines is to reduce the risk of transmission of seasonal influenza viruses. The Memorial Healthcare System provides vaccination to all MHS employees, trainees, medical and allied health staff, and volunteers, consistent with the Centers for Disease Control and Prevention Advisory Committee on Immunization Practices recommendations. The Employee Health Department coordinates and monitors the administration of vaccinations throughout the System.

These guidelines are intended to supplement and support the Memorial Standard Practice, "Influenza Infection Control." If any of the statements contained in this policy conflict with Standard Practice, then the Standard Practice shall supersede this policy and shall control the outcome of any such conflict.

### **SCOPE**

All onsite and hybrid workers (including employed, voluntary, and contracted) in clinical and non-clinical settings at a Memorial Healthcare System location.

## **POLICY**

All Memorial Healthcare System staff, paid and unpaid, are required to receive the influenza vaccination each influenza season unless they are approved for an exemption. This requirement applies to all onsite and hybrid workers (including employed, voluntary, and contracted) in clinical and non-clinical settings. It does not apply to workers who are 100% remote.

### **PROCEDURES**

#### Influenza Vaccination

Individuals may choose to receive the vaccination from their designated Employee Health department or may obtain vaccination from a healthcare provider/clinic of their choosing. Those electing to obtain vaccination from their own healthcare provider/clinic must provide Employee Health with documented proof of vaccination, including the name of the individual vaccinated, the name of the healthcare provider/clinic that administered the vaccination(s), with the date(s) of vaccination, and brand name of the vaccine. Individuals may send vaccination records to <a href="VaxMedEx@mhs.net">VaxMedEx@mhs.net</a>, with "Vaccination Record" in the subject line, ensuring that their employee number (if applicable) is included in the e-mail.

After the vaccination series is administered (or proof of vaccination is provided), Employee Health/designee shall provide a sticker for placement on the individual's identification badge.

#### **Exemptions as Medical and Religious Accommodations**

Individuals may request an exemption to this requirement for reasons of medical or religious accommodation. Exemptions for other reasons will not be granted. Those approved for an exemption will be required to wear a mask in clinical settings and follow any other established safety precautions for the duration of the influenza season, or as otherwise directed by Memorial's Chief Medical Officer (CMO).

Individuals seeking an exemption for medical reasons (including pregnancy-related medical conditions) must submit a completed Influenza Vaccination Medical Exemption Request Form to Employee Health (VaxMedEx@mhs.net) and must provide supporting documentation from their healthcare provider. Workers seeking an exemption for religious reasons must submit a completed Influenza Vaccination Religious Exemption Request Form to Employee Relations (VaxRegEx@mhs.net) and must provide supporting documentation. In certain areas, where patients are especially vulnerable (specifically, oncology and transplant units), Memorial may not be able to reasonably accommodate unvaccinated employees.

#### **Auditing and Monitoring of Vaccinations**

- The Employee Health Department tracks and reports employee vaccinations.
- The Medical Staff Office tracks and reports medical staff vaccinations.
- · Volunteer Services tracks and reports volunteer vaccinations.
- Organizational Development/Education tracks and reports student vaccinations.
- Employee Health reports aggregated vaccination compliance data internally to MHS managers and administrators.
- Vendors are responsible for confirming that all workers assigned to Memorial Healthcare
  System facilities are in compliance with this policy. Prior to the established deadline for each
  influenza season, Vendors must provide an attestation that their assigned workers are
  compliant, and upon request must produce proof of vaccination or exemption for each
  assigned worker. Contracted workers should contact their employer to provide proof of
  vaccination or request an exemption.

#### **Masking Requirements**

All individuals are required to comply with Memorial's masking and infection control requirements, regardless of vaccination status.

#### **Policy Compliance**

Compliance with this policy and the Standard Practice is a condition of employment for employees. Employees who do not obtain vaccination or have an approved/pending request for exemption by the deadline each year will be subject to disciplinary action, up to and including discharge from employment.

### **DEFINITIONS**

**Clinical Setting:** for the purposes of this policy, clinical settings are defined as the entire building or office in which patient care or treatment is provided. All rooms and areas within the building are defined as a clinical setting, with the exception of the lobby, cafeteria, and break rooms.

**Non-Clinical Setting:** for the purposes of this policy, non-clinical settings are buildings in which no patient care or treatments occur.

**Remote Worker:** for the purpose of this policy, workers are considered 100% remote if they are <u>NEVER</u> required to work onsite at any MHS location or attend Memorial events held onsite or offsite (i.e. training, meetings, new employee orientation, LDI/LDM) at any time. Employees who primarily work remotely but attend any in-person events (even infrequently) are considered hybrid and are required to be vaccinated or have an approved exemption as outlined by this policy.

### REFERENCES

Memorial Standard Practice, "Influenza Infection Control"

CDC. (2021). Prevention and Control of Seasonal Influenza with Vaccines: Recommendations of the Advisory Committee on Immunization Practices – United States, 2021-2022 influenza season. Recommendations and Reports / August 27, 2021 / 70(5);1–28

CDC. (2021). The National Healthcare Safety Network (NHSN) Manual.

CDC, ACIP. (2013). Immunization of Health-care personnel: Recommendation of the Advisory Committee on Immunization Practices (ACIP). MMWR Recomm Rep. 2011;60(RR-7):1-45.

Fla. Stat. § 408.824

# **POLICY OWNER**

Employee Health / Human Resources

If any of the statements contained in this policy conflict with any verbal statements or agreements made by any representatives of MHS, then the statements contained in this policy shall control the outcome of any such conflict.

Memorial reserves the right to modify this policy in whole or in part, at any time, at the discretion of the

Healthcare System, or as required by any legislative, regulatory, or accrediting agency.

Employees who have questions regarding information contained in this policy should contact the Employee Health Department.

This Policy / Guideline / SOP is intended to provide Memorial health care professionals with guidelines for addressing the subject matter herein. This Policy / Guideline / SOP is not meant to be a substitute for the standard of care or to restrain professional judgment or opinion.

### **Attachments**

Flu Vaccine - Medical Exemption Request - 2022.pdf

Flu Vaccine - Religious Exemption Request - 2023.pdf

### **Approval Signatures**

Step Description	Approver	Date
Policy Owner	Elizabeth Kang: Human Resources Compliance Manager	12/2023

## **Applicability**

Memorial Healthcare System