

**TITLE:** Influenza Vaccination Policy  
**SECTION:** Infection Prevention (IP)

### **PURPOSE**

To limit the risk to healthcare personnel of occupationally acquired influenza, and to also limit the transmission of influenza from healthcare personnel to patients, other healthcare personnel, healthcare personnel's family members, and the community. Annual influenza vaccination is recommended for all healthcare personnel and persons in training for healthcare professions by the Advisory Committee on Immunization Practices (ACIP). The Centers for Disease Control (CDC) recommends an annual flu vaccine as the first and best way to protect against influenza.

### **POLICY**

Saint Luke's Health System strives to provide a safe environment for all patients, visitors and employees.

As a condition of employment and/or affiliation, Saint Luke's Health System requires annual influenza vaccination for individuals that have job duties and/or physical presence inside any Saint Luke's Health System owned and/or leased facilities or properties. Saint Luke's Health System will offer influenza vaccination free of charge to these individuals.

### **PROCEDURE**

1. The influenza vaccination program will be administered by Employee Health Services each year when the vaccine becomes available.
2. All SLHS employees, licensed independent providers (LIPs), contracted personnel, student affiliates and volunteers must be immunized against influenza each year. This includes, but is not limited to, those with and without direct patient care/contact.
3. The Due Date for individuals to have received the vaccine each year will be **November 30th**. If the requirement is not met by the Vaccination Deadline of December 31st, the employee will be terminated.
4. An authorization/consent form is signed prior to the administration of the vaccine. Managers will be notified intermittently of the percentage rate of flu vaccine recipients within their departments.
5. Individuals who are vaccinated through services other than through the vaccination program administered by SLHS Employee Health Services will be required to submit proof of vaccination to Employee Health Services by the Due Date. Proof of vaccination may include a physician's note, a receipt, or a copy of consent for vaccination. .
6. Exemption to influenza vaccination may be granted due to medical contraindications or religious beliefs.
7. Employees who do not comply with this policy by the Vaccination Deadline will be terminated (See [SLHS Requirements and Accountability Policy](#)). Non-employees who do not comply with this policy will be separated from affiliation with SLHS or the non-compliance will be referred to the appropriate medical staff office for action. Volunteers who do not wish to be vaccinated, and who do not have an approved exemption, may choose to transition to an inactive status during influenza season.
8. Facility vaccination rates will be calculated and reported, as required, using the National Quality Forum (NQF) #0431: Influenza Vaccination Coverage Among Healthcare Personnel.

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9. In the event of an influenza vaccine shortage, the situation will be evaluated by SLHS System Administration. Employee Health Services, Infection Prevention, Human Resources, Safety/Emergency Preparedness, Pharmacy and Administration will conduct an evaluation, with other departments included as needed, to prioritize vaccine supplies when shortages occur.
10. During influenza season (as determined by the System Medical Director of Employee Health, the Medical Director of Infection Prevention and the local health departments), employees with Influenza Like Illness (ILI) should not work until they are symptom free, unless they have had a Polymerase Chain Reaction (PCR) test to prove they do not have influenza.
11. Employees and affiliates who are exempted, pursuing exemption or who intend to be vaccinated but have not yet completed their vaccination at the commencement of influenza season (as determined by the System Medical Director of Employee Health, the Medical Director of Infection Prevention and the local health departments), will need to mask at all times while inside any of the clinical SLHS owned and/or leased facilities or properties. For the non clinical SLHS entities, individuals who are unvaccinated may be asked to wear a mask. Employees and affiliates who are vaccinated after the commencement of flu season will need to continue to mask for two weeks following vaccination to allow the vaccine to become effective.

#### **New Employees**

Individuals new to Saint Luke's Health System will be notified of the policy. New hires during influenza season will be expected to comply with the vaccination requirement immediately as part of their post-offer, pre-hire requirements. New hires coming into the System after March 31<sup>st</sup> of each year will be notified of the policy, and will be expected to comply with the vaccination requirement the next influenza season.

#### **Medical Exemption**

1. Individuals may request a medical exemption from the influenza vaccination requirement if they have a medical contraindication to receiving the vaccine that is a) listed in the vaccine manufacturer's prescribing information; or b) listed by the Centers for Disease Control and Prevention (CDC).
2. Individuals requesting a medical exemption must complete a [Request for Influenza Vaccine Medical Exemption form](#), signed by the individual's personal, treating physician or Advanced Practice Provider (APP). Request for Influenza Vaccine Medical Exemption forms signed by an emergency medicine physician or a hospitalist will not be accepted unless documentation proves treatment by that physician.
3. The Request for Influenza Vaccine Medical Exemption form must be fully completed, with a specific medical contraindication identified, or will be automatically rejected prior to review.
4. Request for Influenza Vaccine Medical Exemption forms signed by a chiropractor or a Registered Nurse who is not an APP will not be accepted for review.
5. Request for Influenza Vaccine Medical Exemption forms must be completed and turned in to Employee Health Services a minimum of 14 calendar days prior to the Due Date of **November 30<sup>th</sup>** (i.e. **must have reached Employee Health Services by end of day on November 16<sup>th</sup>**).
6. If additional information regarding a medical exemption request is needed, the individual will be notified by Employee Health Services, and will have 14 calendar days from the time of the notification

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to submit the additional information. An individual may be required to sign a release of information authorization form to allow Employee Health Services to request medical records to validate the medical exemption request or to request the individual's physician to contact Employee Health Services to discuss the request.

7. All Request for Influenza Vaccine Medical Exemption forms will be reviewed, and approved or denied by the System Medical Director for Employee Health Services, or his designated alternate.
8. Exemption requests that are denied by the System Medical Director for Employee Health Services, or his designated alternate, will be expected to complete influenza vaccination prior to the Vaccination Deadline, or face termination (see SLHS Requirements and Accountability Policy).
9. Request for Influenza Vaccine Medical Exemption forms not received by Employee Health Services at least 14 calendar days prior to the Due Date will not be accepted, and the individual will be expected to complete the vaccination prior to the Vaccination Deadline or face termination (see SLHS Requirements and Accountability Policy).
10. Individuals approved for vaccination exemption will be required to wear a mask for the duration of influenza season (as determined by the System Medical Director for Employee Health, the Medical Director of Infection Prevention and the local health departments) at all times while inside any of the clinical SLHS owned and/or leased facilities or properties. For the non clinical SLHS entities, individuals approved for vaccination exemption may be asked to wear a mask. Masking requirement modification for those who would have difficulty masking due to health issues or would have difficulty masking during performance of the essential functions of their job will be evaluated on a case by case basis.
11. Individuals approved for vaccination exemption will be given a badge hang tag by Employee Health Services that will signify the mask requirement applies to that individual. The mask requirement is also mandatory, and will be enforced by the department manager. The badge hang tag will not distinguish between a medical or religious exemption.
12. Requests for exemption will need to be resubmitted each year for an updated review by Employee Health Services, unless a permanent exemption is granted by the System Medical Director for Employee Health. Employees may turn in a Request for Influenza Vaccine Medical Exemption form indicating their request is for the same reason as the previous year. Updated documentation will be requested, as needed, after review.

### **Religious Exemption**

1. Individuals may request a religious exemption from the influenza vaccination requirement if they have a genuine and sincerely held bona fide religious belief that does not permit the individual to receive influenza vaccine. Requests for religious exemption will not be granted based upon secular philosophical, political, scientific or sociological objections to the influenza vaccine.
2. Individuals requesting a religious exemption from influenza vaccination must complete a [Request for Influenza Vaccine Religious Exemption form](#), and must submit documentation that addresses the

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individual's religious objection to the influenza vaccine. Submitting documentation from the individual's religious leader or from others aware of the individual's religious practice or belief may be helpful but is not required.

3. Saint Luke's Health System recognizes that religious exemptions are not limited to traditional organized religions, but may also apply to other genuine and sincerely held religious, ethical, or moral beliefs.
4. Request for Influenza Vaccine Religious Exemption forms must be completed and turned in to Employee Health Services a minimum of 14 calendar days prior to the Due Date of November 30<sup>th</sup> (i.e. must have reached Employee Health Services by end of day on November 16<sup>th</sup>).
5. If additional information regarding a religious exemption from influenza vaccination request is needed, the individual will be notified by Employee Health Services, and will have 14 calendar days from the time of the notification to submit the additional information. Individuals may be required to discuss the request for exemption with the System Director of Spiritual Wellness or an alternate designee from the SLHS Spiritual Wellness Department. If a request is made to discuss the exemption and the individual does not discuss the matter with the System Director of Spiritual Wellness or alternate Spiritual Wellness designee prior to the Vaccination Deadline, the request for exemption will be denied.
6. All Request for Influenza Vaccine Religious Exemption forms will be reviewed by the System Director of Spiritual Wellness or his designated alternate from the SLHS Spiritual Wellness department. If the System Director of Spiritual Wellness or his designated alternate determine that reasonable evidence suggests that the exemption is not based on a genuine and sincerely held religious belief, the System Director will consult with SLHS Human Resources Department.
7. If it is jointly determined by SLHS Human Resources Department and SLHS Spiritual Wellness that the exemption is not based on a genuine and sincerely held religious belief, the individual will be expected to complete influenza vaccination prior to the Vaccination Deadline, or face termination (see [SLHS Requirements and Accountability Policy](#)).
8. Request for Influenza Vaccine Religious Exemption forms not received by Employee Health Services at least 14 calendar days prior to the Due Date will not be accepted, and the individual will be expected to complete the vaccination prior to the Vaccination Deadline or face termination (see [SLHS Requirements and Accountability Policy](#)).
9. Individuals approved for vaccination exemption will be required to wear a mask for the duration of influenza season (as determined by the System Medical Director of Employee Health Services, the Medical Director of Infection Prevention and the local health departments) at all times while inside any of the clinical SLHS owned and/or leased facilities or properties. For the non clinical SLHS entities, individuals approved for vaccination exemption may be asked to wear a mask. Masking requirement modification for those who would have difficulty masking due to health issues or would have difficulty masking during performance of the essential functions of their job will be evaluated on a case by case basis.
10. Individuals approved for vaccination exemption will be given a badge hang tag by Employee Health Services Department that will signify the mask requirement applies to that individual. The mask

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requirement is also mandatory, and will be enforced by the department manager. The badge hang tag will not distinguish between a medical or religious exemption.

11. Requests for exemption will need to be resubmitted each year for an updated review by Employee Health Services, unless a permanent exemption is granted by the System Director of Spiritual Wellness. Employees may turn in a Request for Influenza Vaccine Religious Exemption form indicating their request is for the same reason as the previous year. Updated documentation will be requested, if needed.

### IN COLLABORATION WITH

SLHS Chief Nursing Executive, System Director Employee Health and Wellness, System Director Safety, Security and Emergency Preparedness, System Director Quality and Patient Safety, System Director Spiritual Wellness, SLHS Employee Health Committee, SLHS Infection Prevention Committee, SLHS Safety and Emergency Preparedness Coordinators, SLHS Legal Department, SLHS Employee Health Medical Director, System Infection Prevention & Control and SLH Infection Prevention Medical Director.

### REFERENCES

MMWR, Immunization of Health-Care Personnel – Recommendations of the Advisory Committee on Immunization Practices (ACIP), November 25, 2011, Vol. 60, No.7.

Association of Professionals in Infection Control and Epidemiology (APIC) Position Paper: Influenza Immunization of Healthcare Personnel, 2008.

CDC, Prevention and Control of Seasonal Influenza with Vaccines: Recommendations of the Advisory Committee on Immunization Practices – United States, 2013-2014

Association of Professionals in Infection Control and Epidemiology (APIC) Position Paper: Influenza Vaccination Should Be a Condition of Employment for Healthcare Personnel Unless Medically Contraindicated, 2011.

U.S. Equal Employment Opportunity Commission: Compliance Manual on Religious Discrimination (2008)

### SEE ALSO

[Request for Influenza Vaccine Medical Exemption \(SYS-575\)](#)  
[Request for Influenza Vaccine Religious Exemption \(SYS-576\)](#)  
[SLHS Requirements and Accountability \(HR-029\)](#)


**SLHS Entities Covered by this Policy:** This policy applies to all SLHS entities including all hospitals:  
Anderson County Hospital (d/b/a for Saint Luke's Hospital of Garnett, Inc.)  
Crittenton

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Hedrick Medical Center (d/b/a for Saint Luke's Hospital of Chillicothe)  
Saint Luke's Cushing Hospital  
Saint Luke's East Hospital  
Saint Luke's Hospital of Kansas City  
Saint Luke's North Hospital (d/b/a for Saint Luke's Northland Hospital Corporation)  
Saint Luke's South Hospital, Inc.  
Wright Memorial Hospital (d/b/a for Saint Luke's Hospital of Trenton, Inc.)


**APPROVALS**

  
Katherine Howell, Sr. VP, Chief Nurse Executive

09/15/2015  
Date

  
Leonardo Lozada, MD, Senior VP/Chief Physician Executive

09/15/2015  
Date

  
Dawn Murphy, Senior VP, Human Resources

09/14/2015  
Date

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