

POLICIES & PROCEDURES

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Authorized by: Infection Prevention and Control	Date Established: 5/1/17	Date Revised: 5/1/17

I. POLICY

Evidence-based clinical research regarding influenza has shown that the best method for prevention and control of seasonal influenza is vaccination. The purpose of this policy is to support achievement of high rates ($\geq 90\%$) of influenza vaccination in order to protect the health of NorthShore patients, employees, partner employees, and clinical providers from influenza infection.

Therefore, as a condition of employment with NorthShore and a condition of operating as an Active Non-Employed staff member (defined below), providing services within NorthShore's location(s), NorthShore requires annual influenza vaccination for all **Active Employed** and **Active Non-Employed/Third-party staff**. Consistent with other vaccines that are mandated and are a condition of employment at NorthShore, the influenza vaccination is provided free of charge to eligible staff.

II. SCOPE

This policy applies to all Active Employed and Active Non-Employed staff – see definitions that follow.

III. DEFINITIONS

For the purpose of this Mandatory Influenza Vaccination policy, the following definitions apply:

- 1) **Active Employed Staff** – Active Employed staff includes employees, whether part-time, full-time, or resource, employed by NorthShore University HealthSystem. This definition includes both clinical and non-clinical staff.
- 2) **Active Non-Employed/Third-party Staff** – Active Non-Employed staff are generally defined as individuals who have been issued a NorthShore identification number. Individuals included are those authorized to work and/or observe work within and on behalf of NorthShore University HealthSystem whether paid or unpaid, but not employed by NorthShore. This definition includes both clinical and non-clinical workers, physicians, licensed independent practitioners, members of the professional staff (as defined by the MEC), temporary workers, contracted and subcontracted workers, students, researchers, volunteers, clergy, representatives from pharmaceutical or other organizations (that would be identified through the Reprax system) and agency personnel.
- 3) **Annual Influenza Vaccination Program** – NorthShore's Annual Influenza Vaccination Program occurs each year during the months when maximum benefit can be provided by an influenza vaccination. NorthShore conducts a program that includes establishing processes within the Employee Health Services and Human Resources Offices, designated remote sites, and vaccination sites designated (and staffed by nursing) on select nursing floors or practice offices (staffed by practice personnel). The administration of the program is under the direction of NorthShore's Infection Prevention and Control (IPC) Department with clinical guidance provided by Employee Health Services (EHS), and the Corporate Quality Transformation office and supported by Human Resources and the Professional Staff Office. Human Resources support includes addressing and

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managing the employment requirement associated with this policy. The organization-wide program typically starts in **September** and ends in **December**.

- 4) **Employee Health Services (EHS)** – Is the physician practice group within the Medical Group that provides employee and occupational health services across NorthShore.
- 5) **Exempt Individuals**– Persons confirmed by the Influenza Vaccination Exemption Committee (the “Committee”) as exempt from receipt of the influenza vaccination for medical or religious/personal conscience reasons. Exemptions must be applied for and renewed each year; authorization does not automatically carry over from one year to the next.
- 6) **Flu Season** – Peak flu season is between December and March, with outbreaks possible as early as October and as late as May.
- 7) **Influenza Vaccine** – A preparation of influenza antigens that stimulates the production of specific antibodies in the recipient of the vaccine, when introduced into the body. These antibodies provide protection against influenza virus infection. Currently, NorthShore offers inactivated (killed virus) influenza vaccine, which is administered in the muscle of the recipient. For most staff members (employed and non-employed), NorthShore uses the "quadrivalent" vaccine that is made to protect against four flu viruses. **A high dose vaccine is also offered for healthcare personnel aged 65 years and older.** There is no live virus vaccine currently administered at NorthShore.

IV. PROCEDURES FOR OBTAINING VACCINATION

Action	Responsibility
1) WHEN - Annually between September and November, NorthShore’s Annual Influenza Vaccination Program is set up to administer vaccinations which will be made available to Active-Employed and Active Non-Employed staff at various locations across the system. A schedule of dates and times will be published prior to the first date that vaccines are available.	<ul style="list-style-type: none"> • Employee Health Services (EHS) • Human Resources (HR) • Infection Prevention and Control (IPC)
2) WHERE - The administration of influenza vaccinations at NorthShore will be provided at no cost to NorthShore staff who are required to receive the vaccine. <ol style="list-style-type: none"> a) Internal Source – EHS is a central site for delivering the flu vaccinations, but multiple additional sites will be named as the Annual Influenza Vaccination Program begins. b) External Source - Anyone choosing to obtain a vaccination outside of NorthShore must provide verifiable documentation of 	<ul style="list-style-type: none"> • Corporate Quality Transformation Office

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<p>vaccinations to EHS no later than 4:00 pm on the last business day of November. These external arrangements and costs are the responsibility of the individual and can count as credit towards the mandatory flu policy as long as the appropriate documentation is submitted within the approved timeframe.</p>	
<p>3) NEW STAFF - New Active Employed and Active Non-Employed staff members are required to comply with NorthShore’s vaccination requirements. The requirement for annual vaccination is a condition of employment and required in order to establish access to NorthShore’s systems and facilities. Staff hired/brought on after the close of the Flu Program but before March 31st, must obtain the flu vaccine at EHS or at an external source and are required to submit the documentation that verifies receipt of the vaccination. Individuals brought on after March 31st, may wait until the next Flu Program begins. The flu vaccine for new employees will be administered along with all other pre-employment Employee Health Screening.</p>	<ul style="list-style-type: none"> • HR • EHS
<p>4) EXEMPTIONS - Eligible individuals may decline the administration of the vaccine under certain circumstances. The eligible individual must submit an application for exemption declining the annual flu vaccine to obtain approval:</p> <p>a) Request Process - All applications for exemptions require the submission of the exemption application. This application is reviewed by the Influenza Vaccination Exemption Committee. Depending on the reasons for the exemption request, the staff member will be asked to provide documentation from the clinician or clergy to support the requests. These submissions will be required in writing.</p> <p>b) Notification of approval – Within 15 days of receipt of the application request, the applicant will be advised by the Influenza Vaccination Exemption Committee members as to the disposition of the application.</p> <p>c) Valid Exemption Reasons - All exemption applications are assessed by the Committee, which is made up of members from Employee Health Services, Infection Prevention and Control, and</p>	<ul style="list-style-type: none"> • EHS • Influenza Vaccination Declination Committee • HR

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<p>other relevant content experts and organizational leaders. Some of the valid reasons for supporting a refusal of the vaccination are noted in the text that follows:</p> <ul style="list-style-type: none"> i) Guillain-Barre Syndrome: A history of Guillain-Barre Syndrome within six weeks following a previous dose of influenza vaccine is considered to be a precaution for use of influenza vaccines by the Centers for Disease Control and Prevention (CDC). Verifiable documentation is required from a licensed healthcare provider. ii) Allergy: Some staff members with severe allergies to eggs or to other components of the influenza vaccine may refuse the standard vaccination and will be offered egg-free or cell-based vaccine. iii) Religion or Personal Conscience: Eligible staff members may be granted an exemption if receiving the vaccination would violate the employee's sincerely held religious beliefs and/or personal conscience. Supportive documentation regarding these beliefs may be requested. iv) Drug Contraindication - If a staff member has a contraindication that prevents the individual from receiving the flu vaccine. Appropriate clinical evidence will be required to support the application. <p>d) Decision Resolution and Appeal Process – Once a decision is rendered from the Committee, the Committee will notify the individual, EHS, and HR.</p> <ul style="list-style-type: none"> i) Exemption Denied – if an exemption is denied, the individual will be notified and must comply with this policy. The staff member will have 7 days from the date of notification to submit a written appeal to the Appeals Committee. The Appeals Committee is comprised of representation from Hospital Administration, Clinical Leadership, and Human Resources. The Appeals Committee will be required to reply in writing to the staff member within 7 days. Any appeal submitted must include new information not previously disclosed in order to be considered. The decision of the Appeals Committee is final and binding. 	

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<p>ii) Exemption Granted - if an exemption is granted, the staff member will be notified and informed regarding additional preventive infection control measures that he/she must comply with to ensure the risk of exposure to patients and co-workers is mitigated. Should an employee fail to comply with the specified infection control measures, the employee may be terminated. It is incumbent on the manager to report non-compliance to the appropriate oversight group which may include human resources, the subcontracted vendor, or the professional staff office to discuss next steps.</p> <p>e) Business Continuity – In the event that a significant number of people in a specific unit or department apply for an exemption, the Committee has the right to deny application(s) to ensure the remaining staffing level allows the business to continue and to ensure that safe care is delivered.</p>	
<p>5) PREVENTATIVE INFECTION CONTROL MEASURES - Non-vaccinated staff are required to comply with preventive infection control measures established by NorthShore to reduce the risk of transmitting influenza to patients, visitors, family members and other personnel. These conditions may include, but shall not be limited to:</p> <p>i) Face Mask – An approved non-vaccinated staff member may be required to wear a face mask in patient care areas and/or throughout hospitals. This determination will be made by the Hospital Epidemiologist/Medical Director of Infection Prevention and Control in consultation with the Director of Infection Prevention and Control and the Medical Director of Employee Health Services.</p> <p>ii) Site-Specific Interventions - The implementation and enforcement of preventive infection control measures may vary in different settings based upon the risk of transmission by and/or exposure to individual personnel or patients, family members, visitors or other personnel. These interventions are clinically driven and are recommended by the Medical Director of Infection Prevention and Control.</p>	<ul style="list-style-type: none"> • Medical Director of Infection Prevention and Control • EHS • HR

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<p>iii) Transfer – In some cases an eligible non-vaccinated staff member may be asked to move into a staff assignment that creates less risk for patients.</p>	
<p>6) DOCUMENTATION</p> <p>a) External Vaccinations - Documentation of vaccine acquired outside of NorthShore will be reviewed by EHS, must be verifiable, and must include date, place, and signature of the provider who gave the vaccine.</p> <p>b) Medical Contraindications - The medical contraindications to mandatory flu vaccination are outlined in Section-IV. Written verification of contraindication to influenza vaccination is an acceptable reason to decline the vaccine.</p> <p>c) Religious/personal conscience exemption -- Sufficient documentation expressing a sincerely held religious belief/personal conscience objection regarding the disallowing of vaccination must be submitted to the Influenza Vaccination Exemption Committee. This is a personal statement that must reflect a sincerely held religious and/or conscience conviction in opposition to the vaccination and may need to include supportive documentation when appropriate.</p>	<ul style="list-style-type: none"> • EHS • Influenza Vaccination Declination Committee
<p>7) CONSEQUENCE OF NON-COMPLIANCE – Consequence of non-compliance of this policy is termination either of employment and/or access to NorthShore’s facilities and systems. Once the deadline of the Flu Program has ended (4pm on the last business day of November), non-compliant Active Staff Members will be contacted by Human Resources. Non-compliant Non-employed Active Staff Members will be notified by the appropriate managing individual. After initial notification, these staff members will receive one more opportunity to comply within 14 days from the last date of the campaign. Non-compliance after the 14 day extension will result in the termination of the staff member’s employment and/or access to NorthShore facilities and systems. Each non-compliant situation will be assessed based on the individual circumstances. Human Resources will manage the employment termination process. For non-employed professional staff specific consequences are outlined in the professional staff by-laws.</p>	<ul style="list-style-type: none"> • EHS • HR

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8) STAFF MEMBERS ON LEAVE - All Active Employed Staff and Active non-Employed Staff on approved leave will be subject to the provisions of this policy upon returning to work.	<ul style="list-style-type: none"> • HR
9) CONTINGENT PLAN – If a vaccine shortage exists, EHS will work with Infection Prevention and Control to develop a contingency plan for influenza vaccination of NorthShore personnel with prioritization to high risk areas and /or high risk employee populations per CDC guidelines.	<ul style="list-style-type: none"> • EHS • IPC • HR

NorthShore reserves the right to amend this policy at any time without notice.

APPROVAL:

Signature on File - Lakshmi Halasyamani, MD	Chief Quality & Transformation Officer	7/17/2017
Signature	Title	Date
Signature on File - Kamaljit S. Singh , MD	NorthShore Epidemiologist	7/12/2017
Signature	Title	Date
Signature on File - Lance Peterson , MD	NorthShore Epidemiologist	7/12/2017
Signature	Title	Date
Signature on File - Michael O. Vernon, DrPH	Director, Infection Control	7/12/2017
Signature	Title	Date

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