Influenza Policy - Colleagues and Volunteers -- SAHS

I. Policy Statement: The purpose of this policy is to minimize transmission of the influenza virus in the workplace by providing occupational protection to colleagues and volunteers, and thus, preventing transmission to members of the community which we serve. Annual influenza vaccination has been found to be both safe and effective in reducing the risk of influenza and healthcare related transmission and is the most important measure to prevent seasonal influenza infection. The Centers for Disease Control and Prevention recommend vaccination of all workers in healthcare settings. This policy is intended to maximize the protection offered by vaccines to our colleagues, volunteers, and the community which we serve.

A. All Saint Alphonsus and Trinity Health colleagues and volunteers working at Idaho locations are required, subject to the potential exemptions discussed below, to receive the seasonal influenza vaccine annually.

Because Oregon state law prohibits immunizations as a condition of employment, all Saint Alphonsus and Trinity Health colleagues and volunteers working at Oregon locations are strongly recommended to receive the seasonal influenza vaccine annually.

This policy is in alignment with the Trinity Health Influenza Prevention Program Clinical Operating Policy, which is a multi-disciplinary prevention strategy to protect the patients in our care, as well as preserve the health of colleagues, their families and the greater community.

B. All colleagues, regardless of employment level or FTE*, must meet flu compliance by identified due date below:

1. Influenza exemptions (Idaho only) or declinations (Oregon only) are due by 12:00pm (noon) on the 1st Monday of November
2. Influenza vaccinations (vaccination, proof of vaccination or submission of), are due by 12:00pm (noon) on the 2nd Monday of November.
3. Inability for EHS and HR to verify compliance this time, may result in the following:
   a. The colleague will be placed on formal disciplinary action.
   b. Colleagues that fail to receive their flu vaccination or show proof of vaccination after an additional 7 calendar days may be subject to further corrective action, up to an including termination

*Colleagues on an approved Leave of Absence (scheduled PTO excluded), will be required to meet compliance before their return to work.
C. For colleagues covered by a collective bargaining agreement, this policy will apply to the extent that it is not inconsistent with the terms of the collective bargaining agreement.

II. Definitions: None.

III. Procedure:
A. Colleagues and Volunteers:
1. Idaho and Oregon Vaccination:
   a. Each year the influenza strain changes; for this reason, vaccination with the current formula is required by 12:00pm (noon) on the 2nd Monday of November. Saint Alphonsus will provide vaccination to colleagues and volunteers free of charge facilitated through Employee Health Service (ex: various on-site clinics that will be offered at convenient times and locations; mobile clinics; interdepartmental vaccinations, etc).
   b. If vaccination is not obtained through Saint Alphonsus Employee Health (see above), it is the responsibility of each Saint Alphonsus colleague and volunteer to submit proof of vaccination to Employee Health Services by 12:00pm (noon) on the 2nd Monday of November.
   c. Vaccine proof must include:
      (1) Colleague or volunteer’s name
      (2) Date of vaccination
      (3) Vaccine manufacture name (ex: Afluria, Fluzone, FluMist, etc.)
      (4) Who administered vaccine (provider clinic, pharmacy, military, etc.)
2. Idaho Vaccination Exemptions:
   a. Medical Exemption:
      (1) Exemption from vaccination will be considered but must be formally requested per the guidelines in below.
      (2) Exemption from vaccination may be granted for medical contraindications such as severe allergic reaction (e.g. anaphylaxis) after a previous influenza vaccine dose or to an influenza vaccine component, known severe immunodeficiency or pregnancy for live vaccinations, or a history of Guillain-Barré Syndrome (GBS) within 6 weeks after a previous influenza vaccine.
      (3) Individuals requesting exemption due to medical contraindication must have their provider complete the Influenza Vaccination Medical Exemption form and return it to Employee Health Services by 12:00pm (noon) on the 1st Monday of November to allow 1 week for completion of the exemption review process and decision.
         (a) Physicians/LIP's cannot sign their own medical exemption form as their treating provider.
         (b) Physicians/LIP's may not sign a medical exemption for any colleague within their reporting structure.
      (4) Medical exemption requests will be considered from Medical Doctors (M.D.), Doctors of Osteopathy (D.O.), Nurse Practitioners (N.P.), and Physician Assistants (P.A.) only.
      (5) The medical exemption statement shall indicate whether the exemption should be permanent or temporary. If the exemption is
granted for a temporary health condition, a new request for exemption must be made each year to which the condition applies. If exemption is granted for a permanent condition the exemption does not need to be requested each year unless vaccine technology eliminates the documented contraindication.

(6) Requests for medical exemption will be evaluated through the Saint Alphonsus' exemption review process which includes a MD. If a colleague is granted an exemption to vaccination, the appropriateness of requiring additional personal protective equipment, work restrictions/requirements or reassignment to another area will be determined.

(7) Responses to requests for medical exemption will be provided to the colleague. Additional information from the colleague may be requested if necessary, to adequately evaluate the request for medical exemption. If additional information is requested the response time may be delayed. If an exemption decision has not been determined by the 2nd Monday of November, colleagues may be suspended from work until review has been completed and a decision determined.

(8) If an exemption from vaccination is reviewed and granted, colleagues and volunteers who are not vaccinated must wear a surgical mask according to the Saint Alphonsus Mask Wearing Guidelines.

(a) The mask requirement will begin when the risk of influenza illness has been identified by Saint Alphonsus' Infection Prevention. Communication of mask requirement start date will be sent through Outlook announcements and to managers of exempted colleagues.

(b) The mask requirement end date will be determined by Saint Alphonsus' Infection Prevention based upon facility and community influenza cases.

b. Religious Exemption

(1) Exemption from vaccination may be granted based on an individual's sincerely held religious beliefs, religion or faith. Social, political, or economic philosophies as well as personal preferences do not constitute religious beliefs.

(2) Individuals requesting a religious exemption from vaccination must provide a written request to Human by 12:00pm (noon) on the 1st Monday of November. Colleagues are encouraged to allow up to 1 week for completion of the exemption review process and decision. To request a religious vaccination exemption, you must fill out a Vaccination - Religious Exemption form explaining why the vaccination is contrary to your religious beliefs and, if able, include a statement from your religious clergy, or other appropriate documentation, in support of your request.

(3) Requests for religious exemption will be evaluated through the Saint Alphonsus' review process. If a colleague is granted an exemption to vaccination, the appropriateness of requiring additional personal protective equipment, work restrictions/requirements or reassignment to another area will be determined.
(4) Responses to requests for religious exemption will be provided to the colleague. Additional information from the colleague may be requested if necessary, to adequately evaluate a request for religious exemption. If additional information is requested the response time may be delayed. If an exemption decision has not been determined by the 2nd Monday of November, colleagues may be suspended from work until review has been completed and a decision determined.

3. Oregon Declination:
   a. Oregon colleagues and volunteers can decline the influenza vaccination for any reason, including the medical and religious exemptions described in Idaho Section II (A) and (B) above. The State of Oregon requires employers to track reasons for declination. If an Oregon colleague or volunteer wishes to decline the influenza vaccination, the individual must complete the influenza vaccination declination form and submit it to Employee Health Services by 12:00 pm (noon) on the 1st Monday of November.
   b. Colleagues and volunteers who are not vaccinated must wear a surgical mask according to the Saint Alphonsus Mask Wearing Guidelines.
      (1) The mask requirement for unvaccinated colleagues and volunteers will begin when the risk of influenza illness has been identified by Saint Alphonsus' Infection Prevention. Communication of mask requirement start date will be sent through Outlook announcements and to managers of colleagues who have declined vaccination.
      (2) The mask requirement end date will be determined by Saint Alphonsus' Infection Prevention based upon facility and community influenza cases.

IV. Related Policies/Forms:
   A. **Immunizations -- SAHS**
   B. **Mask Wearing Guidelines -- SAHS**
   C. **Idaho**
      1. **Influenza Vaccination Medical Exemption Form**
      2. **Immunization - Religious Exemption Form**
   D. **Oregon**
      1. **Influenza - Declination of Vaccination, Oregon**

V. References:
   A. **Healthcare Personnel Immunization Recommendations**
   B. **Centers For Disease Control and Prevention – MMWR (Morbidity and Mortality Weekly Report) December 26, 1997-Vol.46-/No.RR-18 "Immunization of Health-Care Workers"**
   C. **OSHA (Occupational Safety and Health Administration) Regulations, Standards 1910.1030, Bloodborne Pathogens (f)(2)(i)**
VI. Approval Committee(s):
A. Saint Alphonsus Health System Human Resources' VP of HR, Chief HR Officer, Regional Manager and Chief Medical Officer – 9/22/2020