

Mandatory Influenza Vaccination Policy

UMMC Policy and Procedure Manual	A-SEH-GEN-GEN-PO-00001
Subject: Mandatory Influenza Vaccination Policy	
Revised Date: 5/24/2021	Effective Date: 11/10/2020
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I. Purpose:

The Centers for Disease Control and Prevention (CDC) recommend annual influenza (flu) vaccinations as the first and best way to protect against influenza. Preventing disease and disability is part of the Healthy People 2020 goals from the Department of Health and Human Services (HHS), and HHS recommends a goal of 90% participation in influenza vaccinations for healthcare systems. Due to a history of low compliance with influenza vaccinations, the University of Mississippi Medical Center (UMMC) adopted a mandatory influenza vaccination policy.

II. Scope:

Offer free of charge influenza vaccinations to all employees during the influenza season to protect faculty, employees, visitors and patients from influenza exposure. Influenza vaccination is mandatory at UMMC.

III. Policy:

All employees, students, and other persons as defined by the UMMC Mandatory Influenza Vaccination Policy will be required to receive the influenza vaccination by the second Monday in December of the designated vaccination period for influenza season. All employees, students, and other persons as defined by the UMMC Mandatory Influenza Vaccination Policy who are initially hired by, enrolled in, or engaged with UMMC within influenza season but after the second Monday in December of the designated vaccination period will be required to receive the influenza vaccination prior to and as a condition of employment, enrollment, training, admittance, engagement, volunteering, observing, and/or the provision of goods or services.

Vaccinations will be offered free of charge to UMMC employees, UMMC students, and volunteers (excluding research volunteers) through Student Employee Health during their usual business hours. Vaccinations will also be available to UMMC employees, UMMC students, and volunteers (excluding research volunteers) at vaccination stations during Flu Blitzes and at other locales and patient care units. One may also receive the vaccination from an outside provider, but written documentation on letterhead of one's personal physician or pharmacy and provided to UMMC by emailing the document to flu@umc.edu. The employee's full name, date of birth and employee ID number are required to be on the documentation provided.

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A. Medical Accommodations:

UMMC employees and UMMC students may request accommodations due to medical exemptions by submitting Medical Accommodation Forms (Appendix A) to Student Employee Health by the fourth Monday in September of the designated vaccination period. UMMC employees and UMMC students hired by or enrolled in UMMC within influenza season but after the fourth Monday in September of the designated vaccination period must submit the forms upon initial employment or enrollment. The physician section of the Medical Accommodation Forms must be completed by one's personal physician or a medical specialist knowledgeable in flu vaccination contraindications. Residents and staff physicians may not complete the physician section of this form unless recognized as designated vaccine providers by Student Employee Health. Student Employee Health will review the forms and may ask requestors to sign release of information forms so that more information may be obtained from the primary care providers. Completed Medical Exemption Forms will be reviewed by content experts in consultation with Infectious Diseases. Reasonable accommodations may be granted on a case-by-case basis.

Valid medical Accommodations may include:

- severe allergy to the vaccination or its components as defined by the most current recommendations of the Centers for Disease Control and Prevention's (CDC) Advisory Committee on Immunization Practices (ACIP) <https://www.cdc.gov/vaccines/hcp/acip-recs/vacc-specific/flu.html> or <https://www.cdc.gov/vaccines/hcp/acip-recs/index.html>
- or history of Guillain-Barre Syndrome within 6 weeks after receipt of prior influenza vaccination.

The CDC does not consider pregnancy or lactation a contraindication to vaccination unless high-risk status can be certified.

B. Religious Accommodations:

UMMC employees and UMMC students may request accommodations based on religious beliefs by submitting Religious Accommodation Forms (Appendix B) to Student Employee Health by the fourth Monday in September of the designated vaccination period. UMMC employees and UMMC students hired by or enrolled in UMMC within influenza season but after the fourth Monday in September of the designated vaccination period must submit the forms upon initial employment or enrollment. The Religious Accommodation Forms will be reviewed and reasonable accommodations may be granted on a case-by-case basis.

C. De Minimis Presence Exclusion:

Persons not defined in the UMMC Mandatory Influenza Vaccination Policy who come onto UMMC campuses in non-clinical areas for infrequent and short durations (<4 hours during influenza season) may by the judgment of Student Employee Health be excluded from the vaccination requirement of the UMMC Mandatory Influenza Policy.

D. Compliance By Other Persons Defined in the Mandatory Influenza Vaccination Policy:

UMMC departments of unpaid faculty and UMMC sponsors of contract workers, volunteers, research volunteers, educational observers, and educational enrichment program participants are responsible for assuring compliance with the UMMC Mandatory Influenza Vaccination Policy. Vendors/suppliers must assure compliance using the designated UMMC system. UMMC expects external academic institutions to assure compliance of affiliated students with the UMMC Mandatory Influenza Vaccination Policy and provide validation to UMMC when audited. Accommodations due to medical or religious beliefs are granted on a case-by-case basis if compatible with patient safety and if the

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processes for medical and religious accommodations were equivalent to the standards set forth in the UMMC Mandatory Influenza Vaccination Policy. UMMC reserves the right to require vaccination if necessary for patient safety.

Individuals who do not receive influenza vaccination pursuant to Subsections (A), (B), and (C), above, must wear a mask at all times while at any UMMC facility or clinic for the duration of influenza season.

IV. Definitions:

- UMMC Employees: According to the CDC, healthcare workers are any employees who provide direct patient care and non-direct care.
- UMMC Students: Defined as all enrolled students at UMMC and students enrolled with the University of Mississippi's School of Pharmacy. Excluded from this definition are students in the following distance education programs with no clinical or research components requiring the physical presence of students on any UMMC campus: School of Dentistry – Advanced Standing Dental Hygiene; School of Graduate Studies in the Health Sciences – Biochemistry Certificate; School of Health Related Professions – Advanced Standing Bachelor of Science in Medical Laboratory Science MLT-MLS, Advanced Standing Bachelor of Science in Radiologic Sciences, Bachelor of Science in Health Sciences, Bachelor of Science in Health Systems Administration, Post-Baccalaureate Certificate in Health Informatics, Post-Baccalaureate Certificate in Leadership and Management; John D. Bower School of Population Health – Executive Master of Science in Population Health Management, Master of Science in Population Health Science, Post-Baccalaureate Certificate in Analytics, Post-Baccalaureate Certificate in Population Health Science.
- Contract Workers: Defined as contractual staff not employed by UMMC who access UMMC buildings and facilities to perform their work. Excluded from this definition are contract workers who are not expected to enter UMMC buildings or facilities.
- Unpaid Faculty: Defined as faculty not employed by UMMC who access UMMC buildings and facilities for academic purposes.
- Vendors/Suppliers: Defined as individuals or representatives for companies that sell goods or services to UMMC and who have access to UMMC buildings or facilities.
- Volunteers, Research Volunteers, Educational Observers, and Educational Enrichment Program Participants: Defined as individuals accessing UMMC buildings or facilities on their own accord to volunteer, observe, or engage in UMMC-sponsored activities.
- Designated Vaccination Period: Defined as the period of time established each year by Student Employee Health and the Department of Infection Prevention during which all groups defined in this policy are required to be vaccinated against influenza, provide proof of vaccination, or qualify for accommodations, if applicable, as outlined by the UMMC Mandatory Influenza Vaccination Procedure.
- Influenza Season: Defined as the time period established each year by the CDC, the Centers for Medicare and Medicaid Services (CMS), or the Mississippi State Department of Health (MSDH) that typically is designated as October 1st through March 31st and will include any additional period of time related to appearance of novel strains of influenza. If flu vaccines are received prior to October 1st, the CDC recommends that vaccination

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period begins when the flu vaccines have arrived.

V. Mandatory Compliance

Failure to comply with influenza vaccinations; to be granted accommodations by the second Monday in December (or prior to and as a condition of employment, enrollment, training, admittance, engagement, volunteering, observing, and/or the provision of goods or services for those initially hired by, enrolled in, or engaged with UMMC within influenza season but after the second Monday in December of the designated vaccination period); or to comply with the mask-wearing mandate will result in the following:

- UMMC Employees: Progressive discipline up to and including termination.
- UMMC Students: Sanctions up to and including dismissal. Disciplinary actions will be managed by the students' schools.
- Other Persons Defined in the Mandatory Influenza Vaccination Policy: Sanctions including denial of admittance, training, engagement, volunteering, observing, and/or the provision of goods or services on the UMMC campuses.

Employees granted accommodations are required to complete and submit a weekly attestation to Student Employee Health confirming compliance with the utilization of masks. Submit Attestation forms each Monday during the Flu season to your immediate supervisor and the following email address: flu@umc.edu. Attestation forms are available on Flu Vaccine website.

ATTACHMENTS:

[Appendix A UMMC Medical Accommodation Form](#)

[Appendix B UMMC Religious Accommodation Form](#)

REFERENCES:

UMMC Mandatory Influenza Vaccination Procedure

Centers for Disease Control and Prevention (CDC) <https://www.cdc.gov/>

Department of Health and Human Services (HHS) <https://www.hhs.gov/>

Centers for Medicare and Medicaid Services (CMS) <https://www.cms.gov/>

Mississippi State Department of Health (MSDH) <https://msdh.ms.gov/>

Attachments:

- [Appendix B UMMC Religious Accommodation Form.docx](#)
- [Appendix A UMMC Medical Accommodation Form.docx](#)

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