Adventist HealthCare, Inc.
CORPORATE POLICY MANUAL
HEALTH CARE WORKER FLU PREVENTION PLAN

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SCOPE:

All Adventist HealthCare employees and HealthCare Workers (HCWs) including physicians, students, volunteers, vendors and contract employees, working at any of the Adventist HealthCare and affiliated facilities during the flu season (Sept. – March).

DEFINITION:

For the purposes of this policy, the vaccination period will be defined as October 1st through an end date stipulated by the CDC or in accordance with the systematic and regular review of the Maryland Weekly Influenza Surveillance Activity Report.

PURPOSE:

The flu prevention plan is designed with the purpose of enhancing health care worker vaccination rates and preventing the spread of the flu during the flu season or pandemic, to patients, residents, HCWs and their families, as well as the community.

POLICY:

Annual Flu vaccination is a condition of employment (CoE) at AHC. All AHC employees and other HCWs working at any AHC and affiliated facilities during the flu season must receive the flu vaccine yearly, unless there is a documented medical or religious exemption. For those with a valid exemption, an exemption form must be signed and accompanied with an appropriate validation note. In addition, regardless of where HCWs work, for those who must be exempt from the flu vaccine, it will be mandatory to properly wear a facemask (available at the facility) during the entire flu season, as determined by AHC based on CDC guidelines. Failure to comply with this policy will result in progressive discipline up to and including termination.

The entity President or leader is responsible in promoting 100% compliance with the flu policy.

PROCEDURE:

The Flu Prevention Plan will be implemented according to the roles and responsibilities assigned in this policy.

I. RESPONSIBLE PERSONS:

A. AHC Occupational Health Director in collaboration with the VP of Clinical Effectiveness and Patient Safety
B. Entity Occupational Health /Human Resources Representative
C. Facility Directors, Managers and Supervisors
D. Facility Infection Control Practitioner or Representative
E. Employees & other HCWs practicing at any of the AHC facilities
F. PR/Marketing/ Communication Representative
G. Medical Staff Services
H. Volunteers
I. Contractors and Vendors

The following section defines the roles played by each of these groups in carrying out the plan. Throughout this written plan, employees with specific responsibilities are identified.

A. OCCUPATIONAL HEALTH DIRECTOR:

The AHC Occupational Health Director in collaboration with the VP of Clinical Effectiveness and Patient Safety will be responsible for the overall direction and oversight of the annual vaccination program. Activities delegated to the Occupational Health Director are as follows, but are not limited to:

1) Maintains overall responsibility for the system-wide implementation of the HCW Flu Prevention plan working with each facility responsible person.
2) Ensures system-wide compliance with CDC guidelines and important information relative to the flu vaccination information statements (VIS).
3) System Flu Rate Reporting
4) Explores ways to improve the AHC vaccination rates.
5) Reviews and revises the Plan as needed to comply with regulatory mandates.

B. ENTITY OCCUPATIONAL HEALTH/HUMAN RESOURCES REPRESENTATIVE:

1) Provides oversight of the entity flu program.

2) Monitors vaccine compliance via Workday Reports and queries.
3) Reports vaccination rates for all HCWs to AHC and the State, or per entity policy.

C. FACILITY DIRECTORS, MANAGERS AND SUPERVISORS:

Department Directors, Managers and Supervisors are responsible for promoting, facilitating and engaging their employees during the flu vaccination campaign at each entity. Responsibilities of the Department Directors, Managers and Supervisors include but are not limited to:

1) Serve as a role model for vaccinations.
2) Assign a department flu vaccine champion and promoter within the department.
3) Assist as needed with employee vaccinations.
4) Monitor employee vaccine compliance.
5) Promote and monitor other established infection control measures to prevent the spread of the flu.

D. FACILITY INFECTION PREVENTIONIST OR REPRESENTATIVE

1) Provides HCW education and training on flu prevention during orientation and annually during the flu season.
2) Works with occupational health/human resources or facility representative to ensure HCWs receive the flu vaccine annually.
3) Assists with HCW vaccinations.
4) Reports entity vaccination rates via shared drive to AHC and to the state as needed, per entity policy.
5) Reports entity influenza-like illness (ILI) as per the established process/frequency, and to the state as needed, per entity policy.

E. EMPLOYEES AND OTHER HCWs:

Employees play an important role in the prevention of the spread of the flu to the patients and residents they care for, other HCWs and their families, and to other AHC customers. HCWs should take the following steps to protect themselves and others:

1) Be vaccinated annually by the date determined by AHC, or in full compliance with this policy.
2) Practice frequent hand washing.
3) Stay home when experiencing influenza-like-illness (ILI) symptoms such as a fever of 100 degrees F. and coughing.

4) Notify your supervisor when ill.
5) Return to work only after remaining fever free for 24 hours without the use of fever-reducing medications.

F. PR/MARKETING/COMMUNICATION REPRESENTATIVES:

1) Collaborate with entities to plan the flu vaccine marketing and flu information and communications, in coordination with the AHC communications department.
2) Ensure each entity's communication is consistent with AHC brand and message.
3) Ensure communication is consistent with CDC flu guidelines for the year.
4) Support entities' efforts to plan, budget for, and coordinate any needs of print media, such as posters, flyers, etc., for vaccine promotion.

G. MEDICAL STAFF SERVICES:

1) Document annual flu vaccination for the medical staff in each credentialing file.
2) Enters vaccine data into appropriate data base to monitor compliance
3) Accept current vaccine records or attestations for vaccines done by other institutions and enters data into physician's database.
4) Communicate medical staff compliance rates to the entity CMO
5) Report medical staff rates to the entity Occupational Health/HR Representative to be reported to AHC.

H. VOLUNTEERS:

1) Document annual flu vaccination for volunteer on each volunteer's file.
2) Enter vaccine data into appropriate data base to monitor compliance
3) Accept current vaccine records for vaccines done by other institutions and enters data into the volunteer's database.
4) Communicate to the volunteers their compliance rates
5) Report volunteer rates to Occupational Health/HR Representative to be reported to AHC.

I. CONTRACTORS AND VENDORS:

1) Comply with the entity flu vaccine requirement by providing appropriate documentation at the point of contact.

II. ENTITY VACCINE ADMINISTRATION:

1) Each entity will have a plan for the annual HCW vaccine administration.

2) Each entity will have a vaccine responsible person or point of contact (POC).
3) The POC will annually promote the vaccine via flyers and posters in coordination with the communications department.
4) Will provide adequate vaccine availability for all HCWs through published clinics.
5) Will secure additional vaccine, if needed, through the entity pharmacy contact.
6) HCWs with current vaccine administration elsewhere and with proper documentation provided and entered in the database will be in compliance.

III. VACCINE EXEMPTIONS:

AHC will accept the vaccine exemption in the following two situations:

A. Validation of a medical condition in which vaccination is contraindicated.
   a. Form requiring PCP signature is located on AHC Intranet: LINK HERE.
B. Validation of religious reason(s)/objection(s) based on the published tenets of the religious organization.
   a. The employee will provide a note, on letterhead from a religious organization or from a physician, to Occupational Health/Human Resources or entity representative. Exemption documentation needs to be provided according to the above guidelines, and is maintained in the medical record, for future reference. HCWs with approved exemption documentation are entered in Workday as such, are counted as compliant.

IV. HOW AND WHEN TO PROCURE VACCINE:

1) Each entity will establish a pharmacy contact relationship that best meets needs.
2) Each entity will place flu vaccine orders for all HCWs in the facility during December/January when most pharmacies place their orders through their suppliers.

V. VACCINE SUPPLY AVAILABILITY:

When Vaccine is in short supply from the vendor and there is a national shortage, entities will:

1) Follow CDC guidelines and established risk groups for vaccinations
2) Communicate vaccine shortage to HCWs via e-mails, print media, PRISM, etc., how vaccine will be administered for the risk groups, and when vaccine will be available.
3) Communicate updates from AHC, from CDC and the Health Department via the entity vaccine POC.

4) Borrow vaccine from another entity with available supply to keep vaccination impetus moving forward. Reimburse the entity or replenish supply accordingly.
5) Use LifeWork Strategies as a vaccine source.

VI. VACCINE DATA ENTRY AND WORKDAY (WD) COMPLIANCE REPORT

1) All vaccine administered and approved exemptions are promptly entered by each entity into Workday (WD), the employee database.
2) Each entity OH POC uses WD to run queries for reporting to monitor compliance.
3) HCW vaccine totals are reported into the AHC Flu Vaccine Reporting Drive, by the entity vaccine POC at the established frequencies.

VII. AVAILABILITY OF THE PLAN TO EMPLOYEES:

The flu plan is available to employees at any time via the intranet.
Employees are advised of this availability during the orientation and training sessions.

VIII. REVIEW AND UPDATE OF THE PLAN:

The plan will be reviewed and updated under the following circumstances:

a) Minimally every three years.
b) When new guidelines are published or when new procedures are implemented which affect HCW flu vaccinations.

IX. METHODS OF COMPLIANCE AND CONTROL:

a. Management Direct Observation of Employee's Work Practices:

To be effective in preventing the spread of the flu during the flu season, directors, managers and supervisors will promote flu vaccinations, and observe employees' work practices, such as frequent hand washing before and after patient care, and by sending employees home when becoming ill at work with influenza-like illness. Disciplinary action will be taken when appropriate work practices or policies are not followed.

b. Management Provision Personal Protective Equipment (PPE) in Area of Responsibility:

Department managers are responsible for ensuring an adequate supply of appropriate protective masks and other items such as hand sanitizers, gloves, etc. are available in the department.

REFERENCES:

1. The Joint Commission (TJC), JCAHO Update for Infection Control: JCAHO Standard Targets resistance to HCW flu vaccinations. http://www.thefreelibrary.com/JCAHO+Update+for+Infection+Control%3a+JCAHO+standard+targets+resistance...-a0149601332

2. CDC Advisory Committee Recommends Flu Vaccination for All People Ages 6 Months and Older 2010-2011 Fly Season http://www.flu.gov/news/blogs/blog20100225.html

3. Centers for Disease Control and Prevention. Influenza Vaccination of Health-Care Personnel Recommendations of the Healthcare Infection Control Practices Advisory Committee (HICPAC) and the Advisory Committee on Immunization Practices (ACIP) MMWR 2006; 355:93-97.
2006; 55:1-16.

4. OSHA: Employers May Require Employees to Take Flu Vaccine. February 16, 2010.Info@jacksonlewis.com

5. Babcock, H. et., al. Mandatory Influenza Vaccination of Health Care Workers: Translating Policy to Practice. Clinical Infectious Disease 2010;50:459-64.

6. Maryland Weekly Influenza Surveillance Activity Report