

Policy Name: Non-Discretionary Vaccine Administration

This policy applies to:

- **OSU Wexner Medical Center** (University Hospital, East Hospital, Brain and Spine Hospital, Richard M. Ross Heart Hospital, Harding Hospital, Dodd Rehabilitation Hospital, Ambulatory Clinics and Services)
- **Ambulatory Surgery Centers** (New Albany, Dublin)
- **Arthur G. James Cancer Hospital and Richard J. Solove Research Institute** and **Outreach Sites**
- **College of Medicine**

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Policy Objective

The Ohio State University Wexner Medical Center (OSUWMC) and Arthur G. James Cancer Hospital and Richard J. Solove Research Institute (The James) will provide and require vaccines for all new and current medical staff and employees. Immunizations may be necessary to obtain and/or retain employment within the organization and must be received no later than the deadline established. This policy supports OSUWMC/The James mission and vision to provide the safest delivery of healthcare to those seeking health care services.

OSUWMC/The James is complying with recommendations from expert panels and professional organizations, who advise that healthcare personnel should and/or must be vaccinated against potential infectious agents to include but not limited to vaccination against measles, mumps, rubella, varicella, and pertussis (post-offer, pre- placement), and influenza (seasonally).

OSUWMC/The James will no longer require primary COVID-19 vaccination or exemptions for new employees. This policy change also extends to learners, volunteers, contractors and vendors learning at or working with the Wexner Medical Center. OSUWMC/The James continues to **strongly recommend** receiving the updated COVID-19 vaccine based on an individual's age or health status consistent with [CDC guidelines](#). The intent is to protect patients, employees, visitors, and the community from vaccine preventable infections while personalizing healthcare to meet the needs of each individual.

This policy allows for consideration of medical, personal, and/or religious reasons for some vaccines as detailed below.

Medical reasons for exemptions from vaccine requirements will be reviewed and approved whenever feasible. For example, personal reasons for exemptions from varicella, measles, mumps, and rubella vaccines will not be accepted. Consideration of personal reason(s) for exemption from influenza and Tdap will be reviewed on a case-by-case basis. However, staff assigned in patient-facing environments with pregnant women and infants will not be granted an exemption from Tdap vaccination requirements.

Work-related vaccines and titers are provided free of charge to faculty and staff. This policy applies to all personnel, irrespective of direct patient contact.

Definitions

Term	Definition
Contractor	Employees of another company or agency who are performing work that would otherwise be performed by an OSUWMC/The James employee, typically for the purposes of meeting increased workload, covering vacancies or providing outsourcing solutions. Examples include: third party staffing, nursing agency staff, “temps,” long-term contract management staff, custodial workers, interpreters, pastoral care, and IT consultants.
Post-Offer/Pre-Placement	Employment and placement in the position is contingent upon completion of health screenings and requirements.
Sponsor	The individual responsible for overseeing the contractor representative’s work (Refer to Appendix A)

Policy Details

A. Vaccine Administration

1. Safety of all personnel, visitors, and patients, including protection from infectious diseases, is a priority.
2. Workers must meet minimum immunizations requirements or demonstrate proof of immunity (see Appendix A for badged contractor process).
3. Occupational Health and Wellness Services (OHWS) will review all faculty and staff’s immunization history and administer vaccines or titers as needed to assure immunity to measles, mumps, rubella, varicella, and pertussis during the post-offer health screening. MMR and Varicella vaccinations and/or immunity are required, or an exemption must be requested and approved.
 - a. It is highly encouraged that vaccine series be completed prior to the first day of employment. All immunizations must be completed within 45 days of the worker’s hire date to retain employment. Departments must allow employees the ability to complete vaccination requirements. Any request for exemptions will be reviewed in collaboration with Human Resources.
 - b. Job offer is contingent on successfully passing all health requirements.
 - c. Immunization is necessary to obtain/retain employment no later than the established deadlines.
4. Immunity is required of all staff unless there is a documented medical reason for exemption.
 - a. Requests for exemption due to medical and/or religious reasons will be reviewed by OHWS in consultation with Office of Human Resources and Americans with Disabilities Act coordinator, where appropriate.
 - b. Inability/contraindication to be vaccinated or provide immunity per definition may require accommodations.
 - c. Workers without required vaccinations beyond the deadline may be subject to termination.
5. Influenza vaccine will be offered to faculty, staff, and volunteers upon receipt of the vaccine supply. Unless

a recognized exemption applies, all faculty and staff are required to receive the influenza vaccine by the established deadlines. Personnel who receive the influenza vaccine at a site other than OHWS will be required to provide documentation to OHWS, so that this information may be entered into the OHWS database. All vaccines will be tracked and documented by OHWS.

6. Personnel who receive the influenza vaccine at a site other than OHWS or a medical center sponsored vaccination event (flu blitz) will be required to upload documentation of the vaccination for review by OHWS. Once determination is made that the documentation is acceptable, OHWS will mark the individual compliant in the system and an automated email will be sent to the individual.

B. Exemptions

1. Requests for the Vaccine Exemption:
 - a. Staff members wishing to obtain an exemption and be considered compliant with this policy shall:
 - i. Fill out an influenza vaccination exemption request in the Enterprise Health Employee Health Portal. Influenza vaccine exemption requests must be submitted by the annual deadline. Enterprise Health Portal
 - b. Requests for exemptions will be reviewed on a case-by case basis and there is no guarantee an exemption will be approved.
2. Limited exemptions from the influenza vaccination requirements will be granted on a case-by-case basis for individuals who have any of the following:
 - a. Severe allergy to any component of a specific vaccine.
 - b. For the influenza vaccine, a history of Guillain- Barré syndrome within six weeks of a prior influenza vaccination.
 - c. Religious reasons that prohibit vaccination, if applicable.
 - d. Disability for which exemption status is a reasonable accommodation.
 - e. Elect to submit a statement which explains any other exemption for consideration. OHWS and HR will make a final decision on exemptions for religious reasons.
 - f. Medical-related exemptions with appropriate documentation from the individual's treating licensed practitioner (e.g., MD, DO, advanced practice provider).
3. If the exemption is granted, the employee must resubmit a request for exemption each year.
4. Pediatric Faculty of the OSU College of Medicine are not required to provide annual influenza vaccination documentation unless the faculty member has been granted clinical privileges at OSUWMC/The James.
5. Emeritus faculty of the OSU College of Medicine who do not possess clinical privileges at OSUWMC/The James are not required to provide annual influenza vaccination documentation.

C. Compliance Tracking: OHWS will issue limitations/restrictions if the worker fails to comply with measles, mumps, rubella, varicella and Tdap vaccine requirements to the worker's supervisor/HR, and/or Information Technology. Information Technology will provide management with reports on percent compliance with influenza vaccination by cost center. OHWS will be responsible for granting exemptions and documenting compliance for off-site vaccines and exemptions and will maintain the vaccination database.

D. Infection Prevention Procedures: For the influenza vaccine, employees with an approved exemption, within the 45-day window with approved accommodations, or not yet vaccinated will be required to wear a surgical/procedure mask for all work activities, as determined by the Medical Director of Clinical Epidemiology.

E. Vaccine Shortage: In the event of vaccine shortage or a limited supply, the situation will be evaluated for the entire OSUWMC/The James. OHWS, Epidemiology, HR, Pharmacy, Hospital Administration, and the Emergency

Management Committee will prioritize vaccine administration based on the health care workers' job function and risk of exposure. Priority must be given to those who provide direct hands-on patient care with prolonged face to face contact with patients or have the greatest risk of exposure to patients.

- F. **Compliance:** Failure to meet the requirements of this policy by the established deadline will result in issuance of limitations/restrictions and may result in progressive corrective action due to non-compliance. If an individual continues to remain non-compliant beyond the established deadline, the individual may be subject to removal of electronic resources and further corrective action up to and including termination. Steps in the corrective action process may be adjusted as determined by Human Resources in conjunction with Corrective Action policies.

Contacts

Office	Phone	Email/Website
Occupational Health and Wellness Services	614-293-8146	Employeehealth@osumc.edu Employee Health - Home (sharepoint.com)

Resources

- [Corrective Action](#)

History

The Ohio State University Wexner Medical Center

- **Issue Date:** 8/12/2009
- **Effective Date:** 11/27/2023
- **Review Cycle:** 3 years
- **Prior Approval Date(s):** 11/8/2017; 8/3/2021; 2/15/2022, 8/24/2023

Approved By (List All Committees)	Approval Date(s)
Policy Oversight Committee	2/2/2022, 8/24/2023
Health System Operations Team	2/3/2022
Policy Oversight Committee	11/27/2023

Arthur G. James Cancer Hospital and Richard J. Solove Research Institute

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Appendix A: Badged Contractors Process

Sponsors of badged contractors are responsible for ensuring the contracted employees are eligible to begin work.

1. Sponsor must complete the sponsor section Health Screening & Clearance form, and provide the form and additional vaccine documentation forms to the applicant
 - a. Contractor must have:
 - b. 10-panel urine drug screen
2. Any specified vaccines and/or titers needed
3. Candidate must provide all of the required documentation to their sponsor and sponsor must submit it to osuocmedcpe@osumc.edu
4. Occupational health will validate and provide clearance for candidates
5. Sponsor will ensure the badged contractors are compliant with the medical center's COVID-19 vaccine requirement prior to employment.
6. The sponsor is responsible for validating that all components are completed before notifying the contractor to pick up their badge in ID Processing