

Student Flu Immunization Policy

Target Group: Cleveland Clinic health system - Students		Original Date of Issue: Not Set	Version 2
Approved by: Board of Directors- Main	Date Last Approved/Reviewed: 08/17/2017	Prepared by: Michelle Hrehocik (PROJECT MANAGER II)	Effective Date 08/17/2017
Euclid Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:		Fairview Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:	
Hillcrest Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:		Avon Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:	
Lutheran Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:		Marymount Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:	
Medina Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:		South Pointe Hospital: Approved by: Board Policy Committee Date approved: 1/23/15 Date implemented:	
CCCHR: Approved by: BOT Date approved: 12/15/2014 Date implemented: 12/15/2014			

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Purpose

This document outlines the process for annual immunizations of all students.

Policy Statement

The Cleveland Clinic strives to protect patients, employees, employees' family members, students and the community from influenza infection through annual immunizations of all students.

Definitions

Cleveland Clinic health system: Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

Student: A person enrolled in a high school or who is studying at a school, college or Cleveland Clinic internal health science program; someone who is studying in order to enter a particular profession; a person who is enrolled in coursework and/or seeking practical experience leading to a career in health care; someone who is at Cleveland Clinic for their own learning and is not benefiting the Cleveland Clinic enterprise as a volunteer; a learning experience greater than 5 days.

Policy Implementation

A. Annual Influenza Immunization

1. All students, regardless of age, including academic (School) clinical instructors or preceptors, who are placed in the Cleveland Clinic health system (CCHs) for more than 5 days and receive a Cleveland Clinic (CCF) identification (ID) Badge for a planned clinical or educational experience during the flu season (typically occurs sometime between November through March) are required to comply with this policy.
2. Any student or academic clinical instructor or preceptor who does not comply with the Student Flu Immunization Policy will not be allowed to participate in a clinical or educational experience within the CCHs.
3. Students, academic clinical instructors and preceptors who do not receive the seasonal flu vaccine, but meet all other health and background check requirements will be provided a clinical placement if available outside of the influenza season (generally, April 1st through October 31st). This policy is to protect vulnerable patient populations.

B. Exemptions

- Cleveland Clinic will consider, as part of its Student Influenza Immunization Policy, bona fide religious and/or medical conflicts with the vaccine. Exemption requests should be managed through the academic (School) institution and Cleveland Clinic's education representative of the specific education program, who will work together to address the request in light of applicable patient safety concerns.

C. Infection Control Procedures

- Influenza season typically occurs sometime between November through March. The exact dates will be determined annually when influenza is identified in the community.
- Occupational Health is responsible for reporting CCHs hospital student and academic instructor or preceptor data to Centers for Medicare & Medicaid Services (CMS).

D. Flu Vaccine Requirements

- Students, academic clinical instructors and preceptors (non-CCF employees) are not eligible to participate in the Employee Cleveland Clinic Influenza Immunization Program and must obtain a vaccination at their own (or their institution's) cost.
- Students or academic clinical instructors or preceptors (non-CCF employee) placed in the health system before or after the flu season begins (typically November) must obtain the annual flu vaccine when it becomes available from their primary care provider (PCP), public clinics, pharmacies, etc. and provide evidence of receiving the flu vaccine to their appropriate academic (School) program.
- Students or academic (School) clinical instructors or preceptors placed in the health system during the flu season (typically occurs in November through March) must show evidence of receiving the flu vaccine to their appropriate academic program before they are on-boarded into the Cleveland Clinic Health System (CCHS).

E. Flu Vaccine Documentation

- Academic (Schools) institutions will attest to student and academic instructor or preceptor compliance with the Student Flu Immunization Policy. Students not affiliated with an academic institution must show evidence that they received the flu vaccine to the CCF employee responsible for student placement.

F. Internal Centers for Medicare & Medicaid Service (CMS) Reporting

- Student Flu Vaccine compliance (CMS data) will be communicated to the Occupational Health Department by Protective Services.

Regulatory Requirement/References

Federal Regulations, State and Local Laws, and FDA U.S. Food and Drug Administration Centers for Disease Control and Prevention (CDC). <http://www.cdc.gov/h1n1flu/masks.htm>

Centers for Disease Control and Prevention (CDC). Influenza vaccination of health-care personnel: recommendations of the Health-Care Infection Control Practices Advisory Committee

(HICPAC) and the Advisory Committee on Immunization Practices (ACIP). Morbidity and Mortality Weekly Report (MMWR) 2006; 55:1-16.

Centers for Medicare & Medicaid Services (CMS), Conditions of Participation for Hospitals, §482.42 Condition of Participation: Infection Control.

National Quality Forum (NQF) #0431 Influenza Vaccination Coverage among Healthcare Personnel

Occupational Safety and Health Act General Duty Clause, Section 5(a) (1), 1970.

NVAC - National Vaccine Advisory Committee, a committee of the Department of Health and Human Services.

The Joint Commission Comprehensive Accreditation Manual for Hospitals, 2012, IC.01.04.01, IC.02.04.01, HR.01.04.01, PI.02.01.01, PI.03.01.01.

U.S. Department of Health & Human Services Action Plan to Prevent Healthcare-Associated Infections: Influenza Vaccination of Healthcare Personnel, May, 2010

Oversight and Responsibility

The Education Institute is responsible for establishing and maintaining the Student Flu Immunization Policy.

All Institutes and services are responsible for adhering to the Student Flu Immunization Policy.

Compliance with Student Flu Immunization Policy will be monitored by the students' academic institution or those responsible for student placement and onboarding within the CChs.

Other Background Information

Issuing Office: Education Institute