

## Student Flu Immunization Policy

<b>Target Group:</b> Cleveland Clinic Health System - Students		<b>Original Date of Issue:</b>  Not Set	<b>Version</b>  1
<b>Approved by:</b>  Board of Directors, BOG/MEC	<b>Date Last Approved/Reviewed:</b>  10/08/2014	<b>Prepared by:</b>  Michelle Hrehocik (PROJECT MANAGER I)	<b>Effective Date</b>  10/08/2014
<b>Euclid Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:		<b>Fairview Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:	
<b>Hillcrest Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:		<b>Lakewood Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:	
<b>Lutheran Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:		<b>Marymount Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:	
<b>Medina Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:		<b>South Pointe Hospital:</b> Approved by: Date approved: Date implemented: Hospital Links:	
<b>CCCHR:</b> Approved by: Date approved: Date implemented: Hospital Links:		<b>Weston, Florida:</b> Date sent:	

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## Purpose

To protect patients, employees, employees' family members, students and the community from influenza infection through annual immunization of all students.

## Policy Statement

### 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) 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 1<sup>st</sup> through October 31<sup>st</sup>). This policy is to protect vulnerable patient populations.

### B. Exemptions

1. 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 the program director of the specific education program, who will work together to address the request in light of applicable patient safety concerns.

## Policy Implementation

### A. Infection Control Procedures

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

### B. Flu Vaccine Requirements

1. 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.

2. 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.
3. 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).

#### C. Flu Vaccine Documentation

1. 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.

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

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

### **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.

### **Issuing Office**

Education Institute

## **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, PL.02.01.01, PL.03.01.01.

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