

<b>Policy Title:</b> Employee Immunization and Screening	<b>Effective Date:</b> August 31, 2021
<b>Policy Number:</b> 3.18	<b>Approved By:</b> Human Resources Executive Team
<b>Excluding:</b> None	

**Policy Purpose**

As a healthcare provider committed to the communities we serve, BJC sets forth minimum standards that must be met at each BJC entity with respect to immunizations and screening procedures for BJC employees and contracted personnel regardless of work location (excluding remote\* contracted personnel) in order to promote a safe and healthy work environment, decrease the risk of vaccinepreventable diseases, establish baseline exposure history, and to evaluate any medical conditions that may affect the ability to perform the essential functions of the offered position.

\*Remote contracted personnel are those who are employed by third-party organizations, working solely at off-site locations, and who rarely enter a BJC facility to perform services and do not provide direct patient care.

**Summary**

This policy outlines requirements, responsibilities and administrative processes for mandated post-offer/pre-placement health screens, vaccines, immunizations, and the process for submitting and reviewing requests for medical and religious exemptions to these mandated requirements. Assessments, tests, and vaccine administration will be provided at no charge to BJC employees and coordinated through Occupational Health Services. With the exception of influenza vaccine forcontracted clinical personnel, contracted personnel are responsible for compliancewith this policy in accordance with the terms of the applicable contract and at their own expense or the expense of their employer.

**Post-Offer/Pre-Placement Medical Assessments**

1. For the protection of BJC patients and staff, a post-offer/pre-placement medical assessment that includes immunization to vaccine preventable diseases is required of all prospective employees, covered contractors, as well as current employees, where applicable (**See Table I**).
2. Occupational Health records are maintained in a confidential employee medicalfile or health record and are kept separate from employee personnel files. An employee may obtain a copy of their health record by submitting a request to Occupational Health per the BJC Access to Employee Exposure & Medical Records policy.

3. Contracted personnel records will be maintained by their contracting agency and available upon request to BJC HealthCare.

### **New Employee Requirements**

1. For new employees, the following will be provided, at no charge, to the employee and must be completed before starting work. Titer(s) will be drawn, and immunization(s) given as needed based on employee history, immunization record, position and hire date (**See Table I**).
2. Once employment begins, the employee must comply with the following to continue working:
  - a. Placement and reading of second of two step tuberculosis (TB) skin test as specified in TB Control Plan or within 21 days after initial TB negative result unless a second test is not necessary or a blood test for TB infection was performed.
  - b. Varicella (Chicken pox) and MMR vaccine will be given within 90 days of hire if they are found to be not immune to these diseases. Notice to employee to begin vaccine series will be processed through the Occupational Health office.
  - c. If applicable, the employee will be required to complete the COVID-19 series within 45 days of the employee's start date. The employee will be scheduled for the first dose during their new hire appointment.
  - d. If applicable, within six months of employment the employee will:
    - i. Receive the second dose of the Hepatitis A vaccine according to dosing schedule as required by work location.
    - ii. Complete the Hepatitis B vaccine series according to dosing schedule if the employee elected to receive the Hepatitis B vaccine. One to two months after completion of the Hepatitis B vaccine series the employee must return to OH for a Hepatitis B surface antibody titer blood test.

### **Current Employee Requirements**

1. Employees need to continue to comply with all applicable immunization requirements.
2. Employees who work or provide services in patient care areas that are at risk of occupational exposure to TB must comply with the annual TB screening, as outlined in the BJC Tuberculosis Control Plan, within the time frame specified by their facility.
3. Employees must report to Infection Prevention, Occupational Health or Nursing Supervisor if they are exposed to communicable infectious diseases (i.e., varicella, TB, measles, rubella, mumps, conjunctivitis). Refer to entity specific Occupational Health/Infection Prevention policy for specific guidelines.
4. In order to identify possible outbreak conditions of communicable diseases and prevent transmission to patients and co-workers, hospital employees are expected to notify the Employee Illness Hotline when unable to work due to possible infectious symptoms, such as nausea, vomiting, diarrhea, upper respiratory symptoms, sore throat, rashes or pinkeye.

## **BJC Transfers within the System**

1. The receiving Human Resources department will notify their Occupational Health office of employee transfers.
2. Employees will be required to complete a Post Offer/Pre-Placement Assessment form upon transfer to a new entity or department to assess the employee's immunity to vaccine preventable diseases; TB screening; and employee assessments and requirements based on work location. The Initial/Periodic Medical Survey for Persons Who May Handle Hazardous Drugs will be completed by those employees transferring to an area where hazardous drugs are handled.

## **Influenza Immunization**

1. All BJC employees, contracted clinical personnel and volunteers must be immunized against influenza each year. Personnel include, but are not limited to, those with and without direct patient care/contact.
2. The annual influenza vaccination program is coordinated through Occupational Health, beginning October 1. Immunization will be available through March 31 for those hired after the fourth Monday in November.
3. Employees, contracted clinical personnel and volunteers who are vaccinated through services other than BJC Occupational Health (e.g., private physician office, public clinics) must provide proof of immunization to Occupational Health before 5pm on the fourth Monday in November. Proof of immunization may include a physician's note, a receipt, or copy of consent.
4. Employees on an approved leave of absence on or after the fourth Monday in November must provide proof of immunization on or before the date of their return.
5. Infection Control Procedures
  - a. Employees who have been granted an influenza immunization exemption are required to wear a surgical or isolation mask in all patient care areas while at work during influenza season in the community where the hospital or service organization is located. Employees can contact Occupational Health for information on local infection control procedures.
  - b. Influenza season typically occurs sometime from November through March. The exact dates for wearing masks will be determined annually when influenza is identified in the community where the hospital or service organization is located. The exact dates will be determined by the Infection Prevention and Epidemiology Consortium Medical Director.
6. Occupational Health will maintain a record of influenza immunization.

## **COVID-19 Immunization**

1. All BJC employees, contracted clinical personnel and volunteers must be immunized against COVID-19. Personnel include, but are not limited to, those with and without direct patient care/contact.
2. The COVID-19 vaccination program is coordinated through Occupational Health. Immunization will be available on an ongoing basis for all new hires.
3. Employees, who are vaccinated through services other than BJC Occupational Health (e.g., private physician office, public clinics, local pharmacy) must provide proof of immunization to Occupational Health before the 5:00 p.m., on the established deadline date. Proof of immunization may include a physician's note, a receipt, or copy of consent.
4. Employees on an approved leave of absence on or after the established deadline must comply by providing proof of immunization within 45 days of their return.
5. Infection Control Procedures
  - a. Employees who have been granted a COVID-19 immunization exemption will be required to wear a surgical or isolation mask in all areas while at work. Employees can contact Occupational Health for information on local infection control procedures.
  - b. The exact dates of a vaccine campaign will be determined by the Infection Prevention and Epidemiology Consortium Medical Director.
  - c. Occupational Health will maintain a record of COVID-19 immunization.

## **Medical and Religious Exemption/Accommodation Requests**

1. Employees may request an exemption from mandatory immunizations based on a medical condition or based on a sincerely held religious belief opposing vaccination. Following is the process for requesting and evaluating each type of exemption and accommodation. Once the required information is provided a decision will be made following the review which may include engaging the employee and/or the employee's physician in the interactive process.
  - a. Medical Exemptions:
    - i. Employees requesting exemption due to medical contraindications must have their private physician complete the Request for Medical Exemption form available from Occupational Health.
    - ii. Unless otherwise specified, all exemptions must be submitted and approved at least 5 working days prior to the deadline for obtaining the required vaccine. New hires and employees returning from a leave of absence must submit requests for medical exemptions within 15 days of their start/return date.
    - iii. Standard criteria for medical exemption will be based upon recommendations from the Centers for Disease Control and Prevention. The standard criteria will be utilized at each hospital and service organization.
    - iv. Each request for medical exemption will be evaluated individually by Occupational Health at the hospital or service organization level.
    - v. The employee will be notified in writing of the decision within five (5) business days after presenting a request for exemption to Occupational Health. If exemption is granted for a permanent condition (i.e., allergy or history of Guillain-Barre after a previous influenza vaccine) the exemption does not need to be requested each year unless vaccine technology would change to eliminate issues

- regarding allergies.
- b. Religious Accommodations:
- i. Employees requesting a religious accommodation must complete the Request for Religious Accommodation form and submit to the Employee Service Center. An evaluation may include the need for an interactive dialog.
  - ii. Unless otherwise specified, all exemptions must be submitted and approved at least 5 working days prior to the deadline for obtaining the required vaccine.
  - iii. New hires and employees returning from a leave of absence must submit requests for religious accommodation within 15 days of their start/return date.
  - iv. Each request for religious beliefs accommodation will be evaluated individually by the Human Resources department.
  - v. The employee will be notified in writing of the decision within five (5) business days after presenting a request to Human Resources.
  - vi. The employee must submit a new request for religious beliefs accommodation each year. The Human Resources department will maintain a record of religious belief accommodations.
- The Religious Vaccination Accommodation Request form may be accessed by clicking [here](#).
- c. Mandatory Testing:
- BJC HealthCare will actively monitor conditions in conjunction with the CDC and state and local public health surveillance bodies, to assess the prevalence and spread of infection. If conditions warrant it, in its sole discretion, BJC will determine if mandatory testing will be implemented. Individuals who are subject to mandatory testing are responsible for doing so in a timely manner, in accordance with direction from BJC Infection Prevention.

### **Failure to Comply**

1. Employees/associates who fail to receive required vaccinations, immunizations, or screening or routine tests, or who fail to provide proof of vaccination, immunization, or screening or routine test to Occupational Health, and/or fail to obtain an approved religious/medical exemption by the deadline will receive be subject to disciplinary action.
2. Employees with no active First Written Notice or Final Warning will be suspended without pay for a maximum of 30 days and will receive a Final Written Warning. If they fail to meet the requirements during their suspension, their employment will be terminated.
3. Employees already on written disciplinary action that fail to comply will be terminated.
4. Employees returning from an approved leave of absence without proof of required vaccination, immunization, screening test or approved exemption will be subject to disciplinary action as outlined above.
5. Failure to comply with this policy may result in disciplinary action, up to and including termination.

**Table 1. Employee Assessments and Requirements**

Assessment	Employees		Time-frame	Requirement		Comments
	All	Based on Work Location/ Position		Required	Offered	
Urine Drug Screen	✓		Post-offer/pre-placement	✓		Additional testing requirements per Policy 7.07 Substance Abuse and per manager/supervisor discretion as applicable
Post-Offer / Pre-Placement Assessment Form	✓		Post-offer/pre-placement & Transfer	✓		
Tuberculosis Screening and Testing	✓		Post-offer/pre-placement	✓		Completion of the individual TB risk assessment and reading of first of two step tuberculin skin test, IGRA blood test (T-Spot), or completion of the Confidential Employee Past Positive TB Skin Test form.
		✓	Post-exposure	✓		<i>Guidelines for management of employees with a positive TB skin test are provided in the BJC HealthCare Tuberculosis Control Plan</i>
Chicken Pox (Varicella)	✓		Post-offer/pre-placement	✓		Proof of immunization or physician diagnosis of disease. If no documented history of chicken pox or immunization, titer should be drawn. Vaccinate if not immune.
COVID-19	✓		Post-offer/pre-placement as indicated	✓		
Measles (Rubeola)	✓		Post-offer/pre-	✓		Titer or verification of two previous MMR vaccines administered at least 28 days apart. Vaccinate if not immune. If Rubella is the only negative titer, only one MMR vaccination is necessary.
Mumps	✓		Post-offer/pre-	✓		
Rubella (German Measles)	✓		Post-offer/pre-	✓		
Pertussis (whooping cough)	✓		Post-offer/pre-placement	✓		Proof of immunization with a single dose of Tetanus, diphtheria, and pertussis (Tdap) vaccine. If no proof of immunization, employee must be vaccinated.
Influenza	✓		Annually	✓		
Meningococcal		✓	Post-offer/pre-placement & every five years		✓	Meningococcal vaccine is to be offered to microbiology laboratory employees at risk of occupational exposure to <i>Neisseria meningitidis</i> , but acceptance is not required
Hepatitis A		✓	Post-offer/pre-placement & at 6- months	✓		First dose of two-dose series if required by work location. History of previous vaccination should be verified with proof of immunization or blood testing of antibody

**Table 1. Employee Assessments and Requirements, cont**

Assessment	Employees		Time-frame	Requirement		Comments
	All	Based on Work Location/ Position		Required	Offered	
Hepatitis B	✓		Post-offer/pre-placement at 1-month & 6-months		✓	Hepatitis B vaccine offered to all employees including those at risk of occupational exposure to bloodborne pathogens within 10 working days. <i>The BJC HealthCare Bloodborne Pathogen Exposure Control Plan details employees at risk of occupational exposure to bloodborne pathogen.</i> First dose of three-dose series given (if starting the series). Declination statement must be signed if employee declines vaccination
Respiratory Medical Evaluation		✓	Post-offer/pre-placement, <i>Annually and Just-</i>	✓		Per the Respiratory Protection Plan
Respirator Fit-testing		✓	Post-offer/pre-placement, <i>Annually &amp; Just-In-Time</i>	✓		Per the Respiratory Protection Plan
Visual Acuity		✓	Post-offer/pre-	✓		Applies to clinical areas where reading of fine/small print is required
Color Vision Screening	-	✓	Post-offer/pre-	✓		
Laser Eye Questionnaire / Amsler Grid		✓	Post-offer/pre-placement & <i>Post-exposure</i>	✓		
Audiometric Questionnaire/Exam		✓	Post-offer/pre-placement &	✓		
Latex Allergy Questionnaire	✓		Post-offer/pre-placement	✓		
Handling of Hazardous Drugs		✓	Post-offer/pre-placement & <i>Biannually</i>	✓	<i>on exit from area</i>	The Initial/Periodic Medical Survey For Persons Who May Handle Hazardous Drugs will be completed by those employees transferring to an area where hazardous drugs are handled.