

	<p style="text-align: center;">MOREHOUSE SCHOOL OF MEDICINE OFFICE OF COMPLIANCE POLICIES AND PROCEDURES</p>	POLICY	COMPLIANCE
		EFFECTIVE DATE	10/11/2021
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	<u>SUBJECT:</u> Mandatory Flu Vaccination Policy and Procedure	SUPERSEDES	10/1/2020

1.0 PURPOSE

The purpose of this policy is to minimize transmission of the influenza virus in the workplace and academic setting by providing occupational protection to staff and providing safety and wellbeing to students, thereby minimizing the transmission of the influenza virus to members of the community, which we serve.

The Advisory Committee on Immunization Practices (ACIP), regarding the use of seasonal influenza vaccines in the United States, has reported that routine annual influenza vaccination is recommended for all persons aged ≥ 6 months who do not have contraindications¹. The influenza season is expected to coincide with continued circulation of SARS-CoV-2, the virus that causes COVID-19. Influenza vaccination of persons aged ≥ 6 months to reduce prevalence of illness caused by influenza will reduce symptoms that might be confused with those of COVID-19. Prevention of and reduction in the severity of influenza illness and reduction of outpatient visits, hospitalizations, and intensive care unit admissions through influenza vaccination also could alleviate stress on the U.S. health care system.²

Adults, specifically those who work in or around healthcare (medical students, residents, faculty and staff) need protection against diseases that are vaccine preventable. The immunized employee or student promotes a safer environment for co-workers and fellow students of the MSM Community.

This policy supersedes the Morehouse Healthcare Vaccination Administration Policy, in part, as it relates to the influenza vaccine and requests for exemptions for the Academic Year.

2.0 DEFINITIONS

Staff – means any regular, non-exempt and exempt staff in research, academic or administrative positions, including residents, postdoctoral fellows, research associates, counselors, non-faculty physicians and non-faculty veterinarians, part-time and full-time employees, as well as contractors and temporary employees that are regularly on campus or participate in any in-person campus activities.

Faculty – means any person possessing either a full- or part-time academic appointment at MSM, including faculty-level research appointees, faculty librarians, health system clinicians, and contributed service faculty that are regularly on campus or participate in any in-person campus activities.

Student – is a person enrolled in an MSM degree program that includes on campus activities. For the purposes of this policy, it does not include those in entirely online programs who do not come to campus.

Campus – All MSM offices and Morehouse Healthcare clinics.

Health Care Provider: A licensed provider authorized to practice medicine by the state in which the provider practices.

¹ Reported as of August 2021; see <https://www.cdc.gov/mmwr/volumes/70/rr/rr7005a1.htm>

² Id.

Influenza (flu) – a mild to severe contagious illness caused by viruses that infect the respiratory tract.

SARS-CoV-2 - The novel coronavirus associated with coronavirus disease 2019 (COVID-19)

Influenza vaccine – preparation of influenza antigens, which stimulate the production of specific antibodies when introduced to the body. These antibodies provide protection against influenza virus infection.

3.0 POLICY

Due to the heightened risk of contracting multiple respiratory infections, including COVID-19, Morehouse School of Medicine (MSM) is requiring the Influenza Vaccine for all Morehouse School of Medicine Faculty, Staff, and Students (collectively, “MSM Community”) that have job duties, attend classes, or otherwise have a regular physical presence inside any MSM owned or operated facility or clinic. All MSM Community members are required to obtain the Influenza Vaccine or request an exemption by November 15th. A request for an exemption may be made as provided for by this policy, as outlined below.

Faculty and Staff are required to provide MSM their written documentation of an influenza vaccination or approved exemption to PeopleAdmin through the Office of Human Resources at the [MSM PeopleAdmin site](#). Students are required to provide MSM written documentation of an influenza vaccination or an approved exemption to Point and Click (PNC) through SHWC’s [PNC patient portal](#). This is a condition of continued employment or participation in Campus activities. Failure to comply with this policy will result in disciplinary action as outlined in Section 7.0 of this policy.

4.0 SCOPE

This policy applies to ALL students, in addition to ALL MSM Faculty and Staff acting in the course of their employment or service to Morehouse School of Medicine.

5.0 ADMINISTRATION

It is mandatory for ALL MSM Community members to obtain the Influenza vaccination by **November 15th of the calendar year**. MSM will provide the seasonal influenza vaccination to the MSM Community based on vaccine availability and published CDC guidelines.

All MSM Community members will be monitored accordingly for compliance. Supervisors shall be responsible for:

- a) Allowing staff time to attend a vaccination clinic.
- b) Assuring that staff comply with this Administrative Policy and Procedure.

6.0 REQUEST FOR EXEMPTION FOR INFLUENZA VACCINE

Any MSM Community member may decline to receive the Influenza Vaccine by submitting a request for exemption to the [MSM PeopleAdmin site](#) or the [PNC patient portal](#) by **November 15th**.

- A. **Exemptions:** Requests for influenza vaccination exemption are limited to medical and religious circumstances. Only individuals meeting the circumstances listed below will be exempt from the influenza vaccination requirement.

1. Medical

- a. Life-threatening allergic reaction associated with an influenza immunization. Documentation from the individual’s Healthcare Provider is required to be received

by November 15th (Attachment A – Vaccine Exemption Request Form) (Attachment B – Healthcare Provider Exemption Request).

- b. A history of Guillain-Barré syndrome within six weeks following a previous dose of a seasonal influenza immunization. Documentation from the individual’s Healthcare Provider is required to be received by November 15th (Attachment A – Vaccine Exemption Request Form) (Attachment B – Healthcare Provider Exemption Request).
- c. Other medical condition that causes significant risk for a serious adverse reaction to the influenza vaccine. Documentation from the individual’s Healthcare Provider is required to be received by November 15th (Attachment A – Vaccine Exemption Request Form) (Attachment B – Healthcare Provider Exemption Request).

2. Religious

- a. Vaccination conflicts with the religious beliefs of the individual. Notarized documentation from the individual’s religious organization is required to be received by November 15th (Attachment A – Vaccine Exemption Request Form) (Attachment C – Religious Exemption Form).

B. Review of request for exemption: The Morehouse Healthcare Medical Director will review all non-student exemption requests. The Student Health Medical Director will review all exemption requests from Students. The MSM Office of Compliance and Corporate Integrity will review ALL requests for exemption to determine approval. Any exception to the policy must be reviewed and approved by the MSM Office of General Counsel in consultation with the Medical Director. Any approved exemptions will be valid only for the influenza season in which they were requested. Exemptions for any and all future flu seasons will require completion and submission of a new request for exemption prior to the deadline for that flu season.

Approved exemption request: All approved persons will be notified of their approved exemption within three business days from the date of submission. All persons exempt from the influenza vaccine requirement will be required to wear a face mask at all times once the flu season is officially declared. Individuals with an approved exemption will be notified directly by the Office of Compliance and Corporate Integrity. The Office of Disability Services will notify the individual’s manager of their approved exemption.

7.0 CONSEQUENCES FOR NON-COMPLIANCE

Individuals’ failure to have documentation of vaccination or an approved exemption request by November 15th, as provided by this policy, will be considered noncompliant with this policy. MSM Faculty, Staff and Students are subject to disciplinary action if they are noncompliant. The consequences of Non-Compliance with this policy are outlined below:

MSM Faculty Members: The first incident of noncompliance will result in restriction of the individual’s MSM network access. Initial noncompliance must be corrected within five days. Noncompliance beyond five days will result in suspension, then dismissal.

MSM Non-Faculty Employees: The first incident of noncompliance will result in restriction of the individual’s MSM network access. Initial noncompliance must be corrected within five days. Noncompliance beyond five days will result in progressive disciplinary action of suspension, then termination.

MSM Students: The first incident of noncompliance will result in restriction of the individual's MSM network access. Initial noncompliance must be corrected within five days. Noncompliance beyond five days will result in additional disciplinary action by the Associate Dean or the Senior Associate Dean of Educational Affairs.

8.0 RELATED POLICIES OR RESOURCES

COVID-19 Return to Campus Policy
MSM COVID-19 Mandatory Testing Policy
Mandatory COVID-19 Vaccination Policy
MSM Student Handbook
AUCC Daily Symptom Checker

ATTACHMENT B

Request for Medical Exemption from Influenza Vaccination

This form MUST be completed by Student/Employee's Licensed Healthcare Provider

Select: Student / Employee Print Name: _____
Date: _____

APPROVED CONTRAINDICATIONS TO THE INFLUENZA VACCINE:

Any person declining the vaccine must have one of the valid contraindications, as listed below.

- History of previous severe allergic reaction to the influenza vaccine or component of the vaccine (defined as developing hives, swelling of the lips or tongue, or difficulty breathing, does not include sore arm, local reaction, or subsequent upper respiratory tract infection).
- A history of Guillain-Barré syndrome within six weeks following a previous dose of influenza vaccine is considered to be a precaution for use of influenza vaccine by the CDC.
- Other _____

I certify that my patient has the above contraindications and request medical exemption from the influenza vaccine. I understand that I could be contacted for additional clarification.

Primary Healthcare Provider Name (Please Print): _____

Primary Healthcare Provider Signature: _____ Date: _____

Specialty: _____

Primary Healthcare Provider Contact Phone Number: _____

Primary Healthcare Provider Contact Address: _____

Attach this form to your INFLUENZA VACCINE DECLINATION form to be considered for a medical exemption. Submit your documentation to Employee/Student Health and Wellness.

ATTACHMENT C

INFLUENZA VACCINE EXEMPTION

This form and accompanying documentation MUST be submitted by November 15 to avoid disciplinary action.

REQUESTING STAFF – COMPLETE THIS SECTION

Note: This form is required for all MSM Community members who are requesting influenza vaccine declination based upon religious exemption by November 15th. This form may NOT be used for personal or philosophical reasons.

Form with fields for Name, Date of Birth, Job Title, Address, Telephone No, Supervisor's Name, and MSM location.

Exemption requested for: [] Influenza vaccine

To receive an exemption to the Influenza vaccination requirement, the individual must provide a statement detailing the religious beliefs that prevent them from receiving the Influenza vaccination being requested. In the space provided below, confirm the Influenza vaccination exemption being requested and state the religious grounds for the exemption request.

Blank lines for providing religious exemption details.

If additional space is needed, attach additional page(s).

Religious Exemption Notice:

No MSM Community member as defined by MSM Flu Vaccination Policy is required to have the Influenza vaccination if contrary to the religious beliefs of the individual. However, request for a religious exemption must be approved and the individuals with an approved religious exemption are required to wear a face mask at all times, when on campus or at any MSM site, once flu season is officially declared. Non-compliance with the requirement to wear a mask as outlined will result in loss of MSM Network access, a final written warning, suspension without pay, and/or termination.

I have read the Religious Exemption Notice (above) and have provided the requested information for a religious exemption from the Influenza Vaccination.

Signature of MSM Community member (required)

Date

RELIGIOUS ORGANIZATION – COMPLETE THIS SECTION BEFORE NOTARY OF PUBLIC

Based upon [name]'s, sincerely held beliefs in the religion [name of religion/faith],

[name], is prevented from receiving the Influenza vaccination requested because it is contrary to

[name]'s sincerely held beliefs in the religion [name of religion/faith].

Signature of Faith Leader (signature before notary required)

Date

Religious Organization's Name, Address, and Phone Number (required)

Sworn to and Subscribed before me this [] day of [], 20 []

Notary Public

My commission expires: [] (Affix Notarial Seal)

Attach this form to your INFLUENZA VACCINE DECLINATION form to be considered for religious exemption. Submit your documentation to Employee/Student Health and Wellness.