

		<b>Policy Title:</b> Employee Vaccination Requirements for McLaren Health System
<b>Effective Date:</b> 10/1/2023	<b>Policy Number:</b> EH 0100	
<b>Review Date:</b> 10/1/2025	<b>Section:</b> Corporate Employee Health	
<b>Revised Date:</b>	<b>Oversight Level:</b> Corporate Employee Health	
<b>Administrative Responsibility:</b> EVP/ Chief Clinical Officer MHC		

## 1. Purpose

1.1. Health Care Personnel (HCP) and Health Care Systems have an ethical and moral responsibility to protect patients from transmissible diseases. Vaccinations have been found to be safe and effective in reducing the risk of health-care related transmissions for identified bacteria and viruses. The purpose of this policy is to minimize transmission of infectious diseases in the workplace and the communities we serve by providing occupational protection to Healthcare Professionals and others, thus preventing transmission of infectious diseases.

## 2. Scope

2.1. McLaren Health Care Corporation (“MHC”), its subsidiaries, any other entity or organization in which MHC or an MHC subsidiary owns a direct or indirect equity interest of 50% or more, provided that, organization has agreed to adopt MHC policies.

2.2. All McLaren health care professionals (MHCP) (corporate and subsidiary employees) who enter a patient care environment, including but not limited to physicians, dentists, podiatrists, psychologists, nurse practitioners, and physician assistants with privileges at any McLaren Health Care site. MHCP also includes members of the medical staff at any McLaren site, as well as contract employees, vendor representatives, students, volunteers, and independent contractors.

2.3. Employees working in an office environment. This includes, but is not limited to McLaren Corporate buildings, central billing offices, Karmanos administrative offices, McLaren Health plan.

2.4. Telecommuters and remote workers who do not have the opportunity to work onsite within a clinical facility are excluded from this policy.

## 3. Definitions - See Employee Health Index A for full list

3.1. McLaren Healthcare Professional (MHCP) - Healthcare Professional includes:

### 3.1.1. Employees

**3.1.2. Medical Staff Members**

**3.1.3. Advanced Practice Clinicians**

**3.1.4. Volunteers**

**3.1.5. Students**

**3.1.6. Contract Personnel**

**4. Policy**

**4.1. New Hire**

**4.1.1. MHC requires all MHCP candidates, who enter a patient care environment, to provide proof of vaccination, immunity by titer, or an approved medical or religious exemption in accordance with this policy for each of the following:**

Measles, Mumps, Rubella (MMR)	<ul style="list-style-type: none"> <li>• Documentation of administration of two doses of live mumps virus vaccine or</li> <li>• Laboratory evidence of immunity or</li> <li>• Laboratory confirmation of disease</li> </ul>	Upon Hire
Varicella	<ul style="list-style-type: none"> <li>• Documentation of administration of two doses of live varicella virus vaccine or</li> <li>• Laboratory evidence of immunity or</li> <li>• Laboratory confirmation of disease</li> </ul>	Upon Hire
Pertussis (Tdap)	Proof of Immunization at least once as an adult.	Upon Hire

**4.1.2. Hepatitis B - MHC highly recommends MHCP whose work, training, or volunteer-related activities involve reasonably anticipated risk for exposure to blood or OPIM be immune. Refer to policy Hepatitis B Vaccination and Post Exposure Process MHC\_EH0101.**

**4.2. Annual Requirements**

**4.2.1. MHC strongly recommends all MHCP, employees working in office environments, remote and telecommuters follow COVID-19 and Influenza vaccine recommendations adopted by the U.S. Centers for Disease Control and Prevention (CDC) applicable to their age, medical condition, and other relevant indications.**

**4.2.2. As a CMS Condition of Participation in Medicare and Medicaid programs, MHC is requiring all MHCP and employees working in office environments to provide**

proof of vaccination or submit a signed informed declination to employee health in the following instances:

**4.2.2.1.** COVID-19-No previous vaccination, submit documentation of 1 bivalent single dose vaccination or signed informed declination.

**4.2.2.2.** COVID-19-Completed Primary Monovalent Series-submit documentation of 1 bivalent booster dose or a signed informed declination.

**4.2.2.3.** Influenza-Submit proof of annual vaccination or signed informed declination.

**4.2.3.** Vendors, volunteers, and non-healthcare professionals who provide infrequent or ad hoc non-healthcare services (such as annual elevator inspection), or services that are performed exclusively off-site, not at or adjacent to any site of patient care area are not required to provide proof of vaccination to perform said services.

**4.2.4.** The Corporate Medical Director of Infection Prevention/Employee Health, in conjunction with the Corporate Chief Clinical Officer and leaders from the Division of Clinical Excellence, may require proof of immunity against specific infectious diseases as recommended by the CDC and/or state public health department for current employees and healthcare providers.

**4.2.4.1.** If a public health department declares an outbreak or cluster of an infectious disease or provides a recommendation regarding vaccination or precautionary measures for a specific infectious disease, McLaren will implement infection control measure recommendations from the public health department.

**4.2.4.2.** During an outbreak or cluster, non-immune MHCP must receive the recommended CDC vaccination for the specific infectious disease or receive an approved medical or religious exemption. If health insurance does not cover the vaccine, McLaren will provide the vaccine at no charge.

**4.2.4.3.** If a non-immune MHCP is exposed to an infectious disease, the person will be furloughed per the CDC defined incubation period for that specific infectious disease. They must be cleared to return to work by Employee Health Services.

**4.2.4.4.** If a non-immune MHCP exposure to an infectious disease requires furlough by public health authorities, MHCP may use accrued paid time off for any time away from work. This will not be covered by Workman's' Compensation.

- 4.2.5** MHC subsidiaries may implement additional vaccination restrictions or deviations by written policy addendum. Any deviation to this policy must be approved by MHC EVP Chief Clinical Officer.

## **5. Procedure**

**5.1. New hire** -see MHC\_EH200 Post Offer Health Assessment and Screening for Post-Offer Candidates.

### **5.2. Annual**

**5.2.1.** It is required by CMS that all MHCP and employees working at McLaren Healthcare, receive the COVID-19 vaccination and annual Influenza vaccination per CDC recommendations or affirm they have received education regarding the vaccination by signing an informed declination (Appendix A).

**5.2.2.** If MHCP and employees have received the required vaccination elsewhere, the Healthcare Professional must provide valid documentation of vaccination to employee health by the completion date stated for the vaccination campaign.

**5.2.3.** Proof of vaccination may include a provider note, MCIR report, a receipt or a copy of consent or attestation, which includes manufacturer, lot number, and date received.

**5.2.4.** Leave of Absence: If an individual is on an approved leave of absence at the time of the applicable completion date, the individual will have two weeks after returning to active status to demonstrate compliance by obtaining the vaccination and, if applicable, completion of vaccine series within recommendation window.

**5.2.5.** All documentation related to completed vaccinations and signed declinations must be submitted to a local McLaren employee health clinic or Corporate Employee Health at [employee.health@mclaren.org](mailto:employee.health@mclaren.org) by the defined deadline outlined for that vaccine season or requirement.

## **6. Implementation**

**6.1.** Vaccinations will be administered based on vaccine availability and published CDC guidelines.

6.2. Each season, key dates (if applicable) will be clearly identified regarding the Vaccination program. For example:

6.2.1. Application for exemption deadline (if applicable)

6.2.2. Kick off date

6.2.3. Completion date

### 6.3. Consequences

6.3.1. **Paid employees** who fail to complete vaccination requirements will be referred to Human Resources.

6.3.2. **Medical Staff** - consequences are set forth in Medical Staff Bylaws and applicable policies. Compliance tracking will be the responsibility of the medical staff office.

6.3.3. **Students** - If a student is not in compliance by the completion date, the student is prohibited from rotating at McLaren facilities until the vaccination requirement is met. Compliance tracking will be the responsibility of the clinical department responsible for tracking student requirements at the local business units.

6.3.4. **Contracted Personnel** - Agreements for contracted personnel should require compliance with this policy. Compliance tracking will be the responsibility of the contracted personnel's employer.

6.3.4.1. The Contracted personnel's employer must furnish proof of vaccination, signed informed declination or an approved exemption within 24 hours upon request.

6.3.4.2. If contracted personnel are not in compliance by the established completion date, contracted personnel will be removed from their assignment and/or not be allowed to conduct business within McLaren Healthcare.

6.3.5. **Volunteers**- provide documentation of vaccination to volunteer service leaders within each subsidiary. Compliance tracking will be the responsibility of the volunteer services leadership.

## 7. References

7.1. Center for Disease Control and Prevention (CDC)  
<http://www.cdc.gov/flu/about/season/index.htm>

7.2. Association for Professionals in Infection Control and Epidemiology (APIC)  
[www.apic.org](http://www.apic.org)

7.3. CDC. Immunization of Health-Care Personnel: Recommendations of the Advisory Committee on Immunization Practices (ACIP). MMWR, 2011; 60(RR-7).

7.4. CDC. CDC Guidance for Evaluating Health-Care Personnel for Hepatitis B Virus Protection and for Administering Postexposure Management, MMWR, 2013; 62(10):1-19.

7.5. IAC. Pre-exposure Management for Healthcare Personnel with a Documented Hepatitis B Vaccine Series Who Have Not Had Post-Vaccination Serologic Testing. Accessed at [www.immunize.org/catg.d/p2108.pdf](http://www.immunize.org/catg.d/p2108.pdf).

7.6. Immunization Action Coalition, Item # P2017 (2/15), Health care Personnel Vaccination Recommendations: <http://www.immunize.org/catg.d/p2017.pdf>.

7.7. MHC\_EH105 Volunteer Screening Requirements

7.8. MHC\_EH200 Post Offer Health Assessment and Screening for Post-Offer Candidates

7.9. MHC\_EH0101 Hepatitis B Vaccination and Post Exposure Process

8. **Previous Revisions:** MHC\_EH100 Immunization Policy

9. **Supersedes Policy:** MHC\_EH 103 Influenza Vaccination Policy

MHC\_EH 104 COVID-19 Vaccination Policy

**Approvals:** Senior Clinical Leadership Committee

*Signature on File*

8/31/2023

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Date