1) Policy Statement

It is the policy of Wake Forest Baptist Medical Center to protect patients, employees, students, trainees, volunteers, and the community from influenza infection through annual immunization of all WFBMC employees, students, trainees, and volunteers.

a) Scope: All WFBMC employees, students, trainees, volunteers, and other “persons of interest” who are granted badge access to Medical Center facilities. For purposes of this policy:

i. Employees include faculty, regular full-time, part-time, and PRN staff, House Officers and contract staff.

ii. Students include medical students, physician assistant students, graduate students within the Medical Center, students of the Doctor of Nursing Practice Program and students of the Nurse Anesthesia Program, student interns and administrative residents.

iii. Trainees include post-doctoral program trainees (postdocs).

iv. Volunteers include all persons performing volunteer work in the Medical Center, including all volunteers in the Volunteer Services Department.

v. Other Persons of Interest include all other persons who are granted Medical Center badges to access facilities. This includes independent consultants and employees of vendors.

b) Responsible Department/Party/Parties:

i. Policy Owner: Human Resources

ii. Procedure: Employee Health Services

iii. Supervision: WFBMC Management

iv. Implementation: WFBMC Directors/Managers
2) **Definitions:** For purposes of this policy, the following terms and definitions apply:

a) **WFBMC:** Wake Forest Baptist Medical Center and all affiliated organizations including Wake Forest University Health Sciences (WFUHS), North Carolina Baptist Hospital (NCBH), Davie Medical Center (DMC), Lexington Medical Center (LMC), Wake Forest Health Network (WFHN), Wilkes Medical Center (WMC), High Point Medical Center (HPMC) and all on-site subsidiaries as well as those off-site governed by WFBMC policies and procedures.

b) **Policy:** As defined in the Policy on Creating and Amending Policy, a statement of principle that is developed for the purpose of guiding decisions and activities related to governance, administration, or management of care, treatment, services or other activities of WFBMC. A policy may help to ensure compliance with applicable laws and regulations, promote one or more of the missions of WFBMC, contain guidelines for governance, and set parameters within which faculty, staff, students, visitors and others are expected to operate.

3) **Policy**

A. **Annual Influenza Immunization**

1. All persons covered by this policy must be immunized against influenza each year.

2. The annual influenza immunization program is coordinated by Employee Health Services.

3. Dates for the annual influenza immunization program and timelines for compliance with the provisions of this policy will be established and communicated each year by the Director of Employee Health Services, in consultation with the Medical Director of Infection Prevention.

4. Influenza vaccines are provided free of charge to all WFBMC employees, WFBMC students and volunteers. All other persons covered by this policy may receive an influenza vaccine from Employee Health Services for a fee or provide proof of influenza immunization from an outside source.

5. Covered persons who are vaccinated through services other than Employee Health Services, such as a private physician office or public clinic, must provide proof of immunization. Acceptable forms of proof are a provider practice/physician’s note or immunization record identifying the type of vaccine administered, date of vaccine and anatomical location.
B. Exemptions

1. Medical Exemptions
   
a. Exemption to immunization may be granted for medical contraindications.

   b. Individuals requesting exemption due to medical contraindications must provide proof of medical contraindications, including a letter from their private physician, before the end of the exemption request deadline (typically one week before the employee campaign ends).

   c. Requests for exemption due to medical contraindications will be evaluated by the Director of Employee Health Services or designee, applying criteria based upon CDC recommendations.

   d. Responses to requests for medical exemption will be provided in writing. Persons requesting exemption are considered compliant with policy during the time requests are under review.

   e. If exemption is granted for a temporary health condition, a new request for exemption must be made each year to which the condition applies. If exemption is granted for a permanent condition, such as allergy or history of Guillain-Barré syndrome (GBS), the exemption does not need to be requested each year unless vaccine technology would change to eliminate issues regarding allergies.

2. Religious Exemptions

   a. Exemption to immunization may be granted based on an individual’s religious beliefs. For purposes of this policy, "religious beliefs" include those that are theistic in nature, as well as non-theistic moral or ethical beliefs as to what is right and wrong that are sincerely held with the strength of traditional religious views. Personal preferences do not constitute religious beliefs.

   b. Individuals requesting exemption due to religious beliefs must submit an exemption request before the end of the exemption request deadline (typically one week before employee campaign ends). The written request must clearly explain why influenza immunization is contrary to the individual's religious beliefs.

   c. Requests for exemption due to religious beliefs will be evaluated by the Director of Employee Health Services or designee, in consultation with Human Resources, applying standards established in Title VII of the Civil Rights Act of 1964 relating to religious accommodations in the workplace. Additional information may be requested if necessary to adequately evaluate a request for religious exemption.
d. Responses to requests for religious exemption will be provided in writing. Persons requesting exemption are considered compliant with policy during the time requests are under review.

C. Employee Health Services will maintain records of all influenza immunizations.

D. In the event of an influenza vaccine shortage, relative to the population of WFBMC employees, students, trainees, and volunteers, Employee Health Services, in consultation with the Medical Director of Infection Prevention, will establish criteria for administration of available vaccine. Generally, priority will be given to employees who provide direct hands-on patient care and/or have high risk of exposure to patients with influenza. Employee Health Services is responsible to communicate when the vaccine is available and to whom.

E. All provisions of this policy may also be applied to immunizations for non-seasonal influenza for which protection is not provided by the annual influenza vaccine, where it is determined that vaccinating employees, students, trainees and volunteers is necessary to protect patients, employees, students, trainees, volunteers and the community from infection. Application of this policy other than to annual influenza immunization will be determined by WFBMC Administration, in consultation with the Director of Employee Health Services and the Medical Director of Infection Prevention.

F. Employees or volunteers who fail to comply with the requirements of this policy will become ineligible to work at WFBMC. Employees will be subject to Corrective Action up to and including the end of employment.

G. Trainees, student interns or administrative residents who fail to comply with the requirements of this policy will become ineligible to continue in their respective training programs at WFBMC.

H. Medical students, physician assistant students, graduate students within the Medical Center, or students of the Nurse Anesthesia Program who fail to comply with the requirements of this policy will be subject to disciplinary action.

I. Other covered persons of interest who fail to comply with the requirements of this policy will have their badge access to Medical Center facilities discontinued.

J. Questions

Questions regarding how the policy applies to a specific situation should be directed to flumail@wakehealth.edu.

4) Review/Revision/Implementation
a) Review Cycle: This policy shall be reviewed by Human Resources at least every three
years from the effective date.
b) **Office of Record**: After authorization, the Legal Department shall house this policy in a policy database and shall be the office of record for this policy.

5) **Related Policies**:
None

6) **Governing Law or Regulations**:
- TJC Hospital Standards IC.02.04.01
- CMS Conditions of Participation
- [CDC Guidelines](#)

7) **Attachments**
None

8) **Revision/Review Dates**
9/09, 9/11, 4/14, 4/17