

# Medical College of Wisconsin Affiliated Hospitals, Inc.

## Institutional Policy

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### COMMUNICABLE DISEASES VACCINATION POLICY

#### PURPOSE

As the sponsor of ACGME accredited residency and fellowship training programs, the Medical College of Wisconsin Affiliated Hospitals (MCWAH) requires its housestaff to take necessary actions to maintain a safe and healthy working, learning and patient care environment for all. Vaccination against certain Communicable Diseases is a safe and effective means of reducing the burden of disease in our community and is important for the health and safety of patients, visitors, employees, and learners at our training sites.

The purpose of this policy is to specify the applicable policies relative to communicable diseases and vaccination for Covered Persons who have matched/been accepted, will do a rotation through, or are training in a Medical College of Wisconsin Affiliated Hospitals, Inc. (MCWAH) sponsored program accredited by the Accreditation Council for Graduate Medical Education (ACGME).

#### DEFINITIONS

**Accommodation Exemption:** An exemption from the requirements under this policy for a Covered Person who has applied for and been granted an exemption from one or more doses of vaccination against a Communicable Disease due to a conflict between the requesting Covered Person's **sincerely held religious beliefs and vaccination** or medical contraindication to vaccination. As ingredients differ by vaccine, a medical or religious exemption is unique to each Communicable Disease vaccination.

**Covered Persons:** This term includes the following:

- Individuals who have matched or otherwise been accepted into a MCWAH program
- MCWAH employed residents and fellows
- Non-MCWAH visiting residents or fellows doing a rotation through a MCWAH program

**Communicable Diseases:** Seasonal Influenza for all Covered Persons. **MCWAH reserves the right to identify additional communicable diseases requiring vaccination based upon current guidance from public health officials including the Centers for Disease Control. Decisions with respect to communicable disease and any additional required vaccinations or other requirements will be announced through established channels which may include email, announcement at the Graduate Medical Education Committee, posting on Infoscope or via letter.**

**Communicable Diseases Season:**

- *Seasonal Influenza* –October through March, annually
  - Season dates may vary slightly from year to year based upon local incidence and recommendations from the Centers for Disease Control and Prevention.

Internal Occupational Health Record: A repository for all employment or training related health records including required vaccinations for employment or training with MCWAH, other vaccinations and exams required for clinical practice at any MCWAH training site or affiliated hospital, and occupational exposures (i.e., **worker's compensation**).

Fully Vaccinated: Means the following:

- Seasonal Influenza: single dose annual vaccination during the Communicable Disease Season

MCWAH Housestaff: Includes residents and fellows employed by MCWAH.

Visiting Housestaff: Residents and fellows, not employed by MCWAH who apply and are approved by MCWAH to do a visiting rotation through a MCWAH Program.

## POLICY

MCWAH requires all Covered Persons to be Fully Vaccinated against Communicable Diseases, with the exception of individuals with a MCWAH approved Accommodation Exemption on file with F&MCW Internal Occupational Health. In addition, MCWAH **affiliate hospitals and training sites may require vaccination against other communicable diseases as a condition of training at such facilities. Covered Persons must comply with the requirements of any site which they are assigned to work or train at.**

Covered Persons shall present either proof of being Fully Vaccinated or have a MCWAH approved Accommodation Exemption on file with F&MCW Internal Occupational Health prior to commencement of employment or their training experience with MCWAH and remain Fully Vaccinated and in compliance with this policy throughout the tenure of their employment or training experience with MCWAH.

Covered Persons seeking an Accommodation Exemption must make a written request for **exemption utilizing MCWAH's Accommodation Exemption process as soon as practicable but no less than eight (8) weeks prior to the Covered Persons employment start date or the first date of their training experience with MCWAH.**

MCWAH offers its employees the opportunity to receive vaccination at no cost through Froedtert & Medical College of Wisconsin (F&MCW) Internal Occupational Health (IOH); alternatively, Covered Persons may obtain vaccination through their personal health insurance coverage (fees may apply).

## PROCEDURE

### Obtaining Vaccination

Covered Persons may obtain vaccination for Communicable Diseases through any of the following:

- Vaccination Clinics coordinated by F&MCW IOH
- Vaccination Clinics offered by MCW and/or other affiliate partners of MCWAH
- Onsite Occupational Health – by appointment only
- External Occupational Health Clinics
- Your primary care physician through your Health Insurance Plan

- Pharmacies covered through your Health Insurance Plan
- Other community and/or governmental health department programs

Covered Persons must submit proof of vaccination to F&MCW Internal Occupational Health (IOH) at [iohfroedtert@froedtert.com](mailto:iohfroedtert@froedtert.com). Proof of vaccination is necessary when receiving vaccine through any provider other than IOH. For example, your F&MCW family care provider does not send IOH vaccination information as your EPIC record is separate and distinct from your Internal Occupational Health Record with F&MCW IOH. In addition, MCWAH is not responsible for any fees associated with obtaining vaccination.

### Accommodation Exemptions

Exemption from immunization may be granted for medical contraindications or for demonstrated, sincerely held religious beliefs in conflict with acceptance of the particular immunization, but only if the requested exemption would not result in undue hardship to MCWAH or its associated training programs. As ingredients differ by vaccine, a medical or religious exemption is unique to each Communicable Disease vaccine and must be applied for separately. Covered Persons whose Accommodation Exemption request has been approved by MCWAH may be required by MCWAH or its affiliated hospitals and training sites to utilize alternative safety measures to prevent the spread of Communicable Diseases while onsite at any affiliated hospital, training site or on campus. Such alternative measures may include use of face coverings, regular disease testing, environmental controls such as barriers, guards and distancing, or similar measures designed to reduce the risk of spread of disease.

By submitting a request for a medical or religious exemption **to MCWAH's vaccination requirements**, the Covered Person authorizes release of information to MCWAH/MCW and F&MCW IOH and **notification to the Covered Person's program leadership** and faculty concerning any approved exemption for purposes of monitoring and enforcement of any related alternative safety measures. Failure or refusal to follow required alternative safety measures may lead to corrective action up to and including termination under MCWAH policies. By submitting a request for exemption to vaccination requirements, the requesting individual represents and warrants that all information contained in the request is truthful and accurate.

MCWAH reserves the right to reconsider any exemption or accommodation based upon CDC guidance, continuing developments in vaccine formulations, discoveries related to Communicable Diseases or other information including information related to the impact of **exemptions on MCWAH's operations and any indication of hardship on MCWAH**. A temporary medical exemption may be granted for temporary medical contraindications, such as pregnancy. A Covered Person must become Fully Vaccinated within 45 days following the resolution of the temporary medical condition.

#### a. Religious Accommodation Exemption

Exemption from immunization may be granted to Covered Persons whose closely and sincerely held religious beliefs conflict with obtaining vaccination, provided such exemption does not present an undue hardship for MCWAH.

Covered Persons seeking exemption from vaccination due to a sincerely held religious belief **must submit a completed "Request for Religious Accommodation Exemption" form to F&MCW Internal Occupational Health ([iohfroedtert@froedtert.com](mailto:iohfroedtert@froedtert.com))**.

Covered Persons seeking exemption are responsible to provide MCWAH/MCW and F&MCW Internal Occupational Health (IOH) with truthful information clearly describing the belief of their religious or belief system that conflicts with receiving a required vaccine, and to **explain how their opposition to receiving vaccination fits within the employee's religious practice or belief system.**

Religious exemption requests are reviewed by a Religious Exemption Review Committee **with final review and approval by MCWAH's Executive Director and Designated Institutional Official (DIO)** and utilize the following guiding principles to make an approval determination:

- vaccination violates the tenets of a closely held religious belief that is sincerely held by the person making the request
- objection is based on religious or ethical principles, not related to the efficacy of a particular vaccine, vaccine formulation or vaccination generally as a population health measure
- objection is not based upon personal preference of the employee

MCWAH acknowledges that individuals may have personal concerns with the contents of vaccination formulations, including formulations containing animal products. F&MCW IOH may offer alternative formulations for required vaccinations. Covered Persons are encouraged to consult F&MCW IOH regarding available formulations and an alternative formulation may be offered in lieu of an accommodation exemption.

#### b. Medical Accommodation Exemption

Exemption from immunization may be granted to Covered Persons due to personal medical conditions and vaccine contraindications, including pregnancy.

Covered Persons seeking exemption from a particular required vaccination due to medical contraindications must **submit a completed "Request for Medical Accommodation Exemption" form and submit supporting medical documentation to F&MCW Internal Occupational Health at [iohfroedtert@froedtert.com](mailto:iohfroedtert@froedtert.com).**

Proof of medical contraindication must be signed by the Covered Person's treating licensed practitioner acting within their respective scope of practice (Medical Doctor (MD), Doctor of Osteopathy (DO), Physician Assistant (PA) or Nurse Practitioner (NP)) and must contain all information specifying which of the authorized vaccines are clinically contraindicated for the Covered Person to receive and the recognized clinical reasons for the contraindications. Covered Persons are not permitted to sign their own medical exemption request form as the treating provider. Note MCWAH will not accept medical exemption request documentation completed by an otherwise qualified provider who is a family member of the individual seeking exemption. Supporting medical documentation must be completed by an independent treating provider.

Medical exemption requests are reviewed by the F&MCW Occupational Health Medical Director or assigned designees. By submitting a request for exemption due to medical condition, Covered Persons authorize contact from the F&MCW Occupational Health Medical **Director (or designee) with the Covered Person's treating provider who authored** documentation of contraindication. MCWAH/MCW or F&MCW Internal Occupational Health may, at any time, verify and authenticate documentation of contraindication by any reasonable method of authentication.

Compliance Tracking and Consequences of Non-Compliance

F&MCW IOH monitors and tracks **compliance with MCWAH's Communicable Diseases** vaccination requirements. F&MCW IOH provides MCWAH with non-compliance reports which MCWAH uses to notify Covered Persons of non-compliance and to enlist program leaders for assistance with obtaining **Covered Person's compliance**.

Covered Persons without documentation of vaccination or a MCWAH approved exemption will be considered non-compliant with the mandatory vaccination program, except as otherwise stated herein. Covered Persons must be Fully Vaccinated and in compliance with all aspects of this policy prior to beginning employment with MCWAH or commencing any rotations or associated activities and must remain Fully Vaccinated and in compliance with this policy throughout the tenure of their employment or training experience with MCWAH.

MCWAH will seek a waiver of its MATCH commitment for Covered Persons who are incoming housestaff who have not presented proof that they are Fully Vaccinated or have a MCWAH **approved vaccination exemption, or who are otherwise not in compliance with MCWAH's** Communicable Diseases Vaccination Policy prior to commencement of employment with MCWAH.

Covered Persons who are accepted into a MCWAH training program who do not go through a binding match process, and who have not presented proof that they are Fully Vaccinated or have a MCWAH approved vaccination exemption, or who are otherwise not in compliance **with MCWAH's** Communicable Diseases Vaccination Policy prior to commencement of employment with MCWAH will be deemed to have rejected their offer of employment with MCWAH.

Once employment has commenced, Covered Persons who are employed by MCWAH who fail to comply with **MCWAH's Communicable Diseases Vaccination Policy after notification of** non-compliance and who do not have a MCWAH approved vaccination exemption in place may be placed on unpaid leave and will be deemed to have resigned their employment and training position with MCWAH if non-compliance is not remedied within ten business days of notification of non-compliance.

Prior to taking the action described in this policy for non-compliance with vaccination requirements, MCWAH or its designee will complete a confidential review of available sources of information to ascertain/verify the Covered Person's vaccination status, this may include information submitted by the Covered Person to the health plan for participating employees.

Covered Persons who are Visiting Housestaff who are not Fully Vaccinated or do not have a MCWAH approved exemption or who are not compliant with any other provision of this policy will not be allowed to do a visiting rotation or commence any onsite associated activities.

#### References

[Centers for Disease Control and Prevention – Influenza](#)

#### [F&MCW Internal Occupational Health](#)

- Contact information and appointment scheduling
- Religious and Medical Exemption forms

#### Attachments

- Not applicable

Original Effective Date: 12/20/2021

Revision History: 10/17/2022; 04/15/2024

Supersedes Policy: N/A

Review Date: N/A

Approved By: Mark D. Hohenwalter, MD  
Interim Executive Director & DIO  
MCWAH