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 for housestaff training in Medical College of Wisconsin Affiliated Hospitals, Inc. (MCWAH) sponsored programs accredited by the Accreditation Council for Graduate Medical Education (ACGME) relative to communicable diseases and vaccination.

DEFINITIONS

Accommodation Exemption: An exemption from the requirements under this policy for an otherwise Covered Person who has applied for and been granted an exemption due to a religious objection 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 populations

- MCWAH employed residents and fellows
- Visiting residents or fellows doing a rotation through a MCWAH program
- Covered Persons does not include any person who has been approved for an Accommodation Exemption.

Communicable Diseases: Seasonal Influenza and COVID-19

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.
- COVID-19 – All Year

Employee Health Record: A repository for all employment or training related health records including required vaccinations for employment with MCWAH, vaccinations and exams required for clinical practice at any MCWAH training site or affiliated hospital, and occupational exposures (i.e. worker’s compensation).
**Fully Compliant:** An individual who has achieved full vaccination for Communicable Diseases under this policy or has received a MCWAH approved Accommodation Exemption. Generally, this means:

- Seasonal Influenza: single dose annual vaccination
- COVID-19: two weeks post either a single or two dose regimen, as recommended, by the Centers for Disease Control. Future boosters may become necessary also as recommended by the Centers for Disease Control.

**MCWAH Housestaff:** Includes residents and fellows employed by MCWAH and training in one of its ACGME Accredited Programs.

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

**POLICY**

MCWAH requires vaccination for Communicable Diseases of all Covered Persons, with the exception of individuals with a MCWAH approved Accommodation Exemption.

New Covered Persons who join MCWAH during the applicable Communicable Diseases Season, and are vaccinated, are expected to present proof of prior immunization against Communicable Diseases within two weeks of their date of hire.

When an unvaccinated Covered Person joins MCWAH, a Covered Person should obtain vaccination for both Influenza (if during Influenza season) and COVID-19 vaccination/booster, as applicable. A new Covered Person will be considered compliant provided the Covered Person begins the vaccination process within their first two weeks of joining MCWAH and completes all requirements within 45 days. In all cases, the Covered Person must be Fully Compliant with both vaccines within 45 days of joining MCWAH. Visiting housestaff must be fully vaccinated and compliant with this policy or have a MCWAH approved exemption prior to beginning a visiting housestaff rotation.

MCWAH offers individuals opportunities to receive vaccination at no cost through Froedert & Medical College of Wisconsin (F&MCW) Internal Occupational Health (IOH); alternatively, individuals 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
- 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*

* Requires Covered Person to submit proof of vaccination to F&MCW Internal Occupational Health (IOH) at 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 Employee Health Record with IOH. In addition, MCWAH is not responsible for any fees due associated with obtaining vaccination outside of F&M Internal Occupational Health.

**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. 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 request has been approved may be required by MCWAH or its training sites to utilize alternative safety measures to prevent the spread of Communicable Diseases while onsite. 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, the Covered Person authorizes release of information to MCWAH/MCW and notification to the Covered Person's program leadership 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 under MCWAH policies.

MCWAH reserves the right to reconsider any exemption based upon a change in vaccination ingredients or other further information. A temporary medical exemption may be granted for temporary medical contraindications, such as pregnancy. Generally, a Covered Person must become Fully Compliant 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&M Internal Occupational Health (iohfroedtert@froedtert.com).
Covered Persons seeking exemption are responsible to provide MCWAH/MCW and F&MCW Internal Occupational Health (IOH) with 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 an MCW 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
- 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 all 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 (iohfroedtert@froedtert.com).

Proof of medical contraindication must be signed by the Covered Person’s treating Medical Doctor (MD), Doctor of Osteopathy (DO), Physician Assistant (PA) or Nurse Practitioner (NP) advising that administration of the vaccine would be detrimental to the health of the Covered Person, and rationale must be consistent with AAP and CDC guidelines. Covered Persons are not permitted to sign their own medical exemption request form as the treating provider nor may a treating provider have a personal relationship with the Covered Person.

Medical exemption requests are reviewed by the F&MCW Occupational Health Medical Director or their 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 Non-Compliance**

Covered Persons without documentation of vaccination or an MCWAH approved exemption will be considered non-compliant with the mandatory vaccination program, except as otherwise stated herein.

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 program leaders for assistance with obtaining Covered Person’s compliance.

MCWAH Housestaff who remain non-compliant with vaccination requirements as stated in this policy following notification, and who have not received an approved exemption will be placed on unpaid leave and be deemed to have resigned their employment and training position with MCWAH if non-compliance is not remedied within ten business days of notification. MCWAH may also seek a waiver of its MATCH commitment if applicable.

Prior to making a final determination of non-compliance with vaccination requirements, MCWAH will complete a confidential review of available sources of information including giving MCWAH housestaff an opportunity to be heard to ascertain/verify their vaccination status, this may include information submitted by the MCWAH housestaff to the health plan for participating employees.

Visiting Housestaff who are not compliant with vaccination requirements, or any other provision of this policy will not be allowed to do a visiting rotation.

**References**

- [Centers for Disease Control and Prevention – Influenza](#)
- [Centers for Disease Control and Prevention – COVID-19](#)
- [F&MCW Internal Occupational Health](#)

**Attachments**

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

**Not applicable**

**Original Effective Date:** 12/20/2021

**Revision History:** N/A