

## Student Immunization Policy

<b>Target Group:</b> Cleveland Clinic health system – Students		<b>Original Date of Issue:</b>  Not Set	<b>Version</b>  3
<b>Approved by:</b>  Board of Directors- Main	<b>Date Last Approved/Reviewed:</b>  03/11/2020	<b>Prepared by:</b>  Rachel King (Title IX / 504 Compliance Coordinator)	<b>Effective Date</b>  03/11/2020
<b>Avon Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020		<b>Euclid Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020	
<b>Fairview Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020		<b>Hillcrest Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020	
<b>Lutheran Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020		<b>Marymount Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020	
<b>Medina Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020		<b>South Pointe Hospital:</b>  Board approval date: 3/18/2020 Effective Date: 3/18/2020	
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## Purpose

This document outlines the process for annual immunizations of all students.

## Policy Statement

The Cleveland Clinic strives to protect patients, employees, employees' family members, students and the community through the immunization of all students, clinical instructors and preceptors.

## Definitions

**Cleveland Clinic health system:** Includes the main campus, Avon, Euclid, Fairview, Hillcrest, Lutheran, Marymount, Medina, South Pointe, Children's Hospital for Rehabilitation, and all Family Health Centers, Physician practice sites, Nevada practice sites, Emergency Departments, Express Care Centers, Urgent Care Centers and Ambulatory Surgical Centers reporting to these facilities.

**Student:** A person enrolled in a Cleveland Clinic educational program, including in a health sciences program or a clinical rotation pursuant to an affiliation agreement with a School. Volunteers who do not receive academic credit for their service are not students.

**Visiting Preceptor:** A clinical instructor or preceptor who is not a Cleveland Clinic caregiver.

**School:** A school, college or university with which Cleveland Clinic has an affiliation agreement that provides for students to complete clinical rotations in the Cleveland Clinic health system.

**Flu Season:** As determined annually by Occupational Health, the period in which the flu is most common. Flu season is typically from November through March.

## Policy Implementation

### A. Annual Influenza Immunization

1. All students, regardless of age, and visiting preceptors, who are placed in the Cleveland Clinic health system (CCHs) for more than 5 days and receive a Cleveland Clinic identification (ID) badge for a planned clinical or educational experience during the flu season are required to receive an influenza vaccination in accordance with this policy.
2. Any student or visiting preceptor who does not comply with this policy will not be allowed to participate in a clinical or educational experience within the CCHs during flu season. However, if such a student or visiting preceptor meets all other health and background check requirements, they may be provided a clinical or educational experience outside of flu season if available.
3. Students or visiting preceptors placed in the health system before or after the flu season begins must obtain the annual flu vaccine when it becomes available from their primary care provider (PCP), public clinics, pharmacies, etc. and provide evidence of receiving the flu vaccine to their School, or directly to the CCHs employee responsible for student placement.

4. Students or visiting preceptors placed in the health system during the flu season must show evidence of receiving the flu vaccine to their School or CChs employee responsible for student placement before they are on-boarded into CChs.

**B. Other Immunizations**

1. Every Cleveland Clinic educational program may establish requirements for additional immunizations based on the nature of a student's or visiting preceptor's clinical placement. These requirements will be communicated to Schools, or directly to students and visiting preceptors, as appropriate.
2. Any student or visiting preceptor who does not comply with these additional immunization requirements will not be allowed to participate in a clinical or educational experience within the CChs.

**C. Exemptions**

1. Medical - Exemption to immunization may be granted for medical contraindications.
2. Religious - Exemption to immunization may be granted for religious beliefs.

Exemption requests will be communicated by students, visiting preceptors or Schools to Cleveland Clinic's education representative of the specific education program in which the student or visiting preceptor plans to participate. Generally, such requests will be granted if they would be granted for Cleveland Clinic caregivers.

**D. Payment for Immunizations**

1. Students and visiting preceptors are not eligible to participate in the Employee Cleveland Clinic Influenza Immunization Program and must obtain all vaccinations at their own (or their School's) cost.

**E. Flu Vaccine Documentation**

1. Schools will attest to student and visiting preceptor compliance with this policy. Students not affiliated with a School must show evidence that they received all required immunizations to the CChs employee responsible for student placement.

**F. Internal Centers for Medicare & Medicaid Service (CMS) Reporting**

1. Student Flu Vaccine compliance (CMS data) will be communicated to the Occupational Health Department by Protective Services.
2. Occupational Health is responsible for reporting CChs hospital student and academic instructor or preceptor data to CMS.

**Regulatory Requirement/References**

Federal Regulations, State and Local Laws, and FDA U.S. Food and Drug Administration Centers for Disease Control and Prevention (CDC).

Centers for Disease Control and Prevention (CDC). Influenza vaccination of health-care personnel: recommendations of the Health-Care Infection Control Practices Advisory Committee (HICPAC) and the Advisory Committee on Immunization Practices (ACIP).

Centers for Medicare & Medicaid Services (CMS), Conditions of Participation for Hospitals, 42 CFR §482.42 Condition of Participation: Infection Control.

National Quality Forum (NQF) #0431 Influenza Vaccination Coverage among Healthcare

## Personnel

NVAC - National Vaccine Advisory Committee, a committee of the Department of Health and Human Services.

The Joint Commission Comprehensive Accreditation Manual for Hospitals, 2012, IC.01.04.01, IC.02.04.01, HR.01.04.01, PL.02.01.01, PL.03.01.01.

U.S. Department of Health & Human Services Action Plan to Prevent Healthcare-Associated Infections: Road Map to Elimination

## Oversight and Responsibility

The Education Institute is responsible to review, revise, update, and operationalize this policy to maintain compliance with regulatory or other requirements.

It is the responsibility of each hospital, institute, department and discipline to implement the policy and to draft and operationalize related procedures to the policy if applicable.

Compliance with this policy will be monitored by the students' academic institution or those responsible for student placement and onboarding within the CCHs.

## Other Background Information

### Issuing Office:

Education Institute

### Reviewed by:

Dr. James K. Stoller, Chairman, Education Institute

### Student Management Collaborative:

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