8.5.8 Pre-Employment Immunization

I. Purpose

To reduce the risk for all UT Health San Antonio personnel whose work or training requires patient or research subject contact or potential exposure to human body or bodily fluids through required immunizations and testing.

II. Scope

This policy is applicable to faculty, staff, fellows, post-docs, visiting scientists or clinicians in a position that requires patient or research subject contact or potential exposure to human blood or body fluids as part of the individual's involvement with research or patient care.

Individuals involved with animal contact or animal blood or body fluids are to follow the current animal work-related occupational health policy regarding immunization requirements.

III. Policy

UT Health San Antonio (UTHSA) is committed to protecting the health and safety of patients, employees, patient and employee family members, and the community as whole by providing a consistent testing and immunization standard for all individuals who are offered positions of employment or training with UTHSA. Immunization requirements are based on current regulations, guidelines, and recommendations from the Centers for Disease Control (CDC) and the U.S. Department of Health and Human Services.

A. Requirements

1. Individuals offered an employment or training position that requires any contact with patients, research subjects, or has the potential for exposure to human blood or body fluids as part of the duties and responsibilities of the position is required to have a Pre-Hire Adult Immunization and Testing Form completed, approved and maintained on file with UTHSA’s Wellness 360 Clinic.
2. A pre-employment **Pre-Hire Adult Immunization and Testing Form** must be completed for any applicant or candidate, internal or external, who is under final consideration, following normal screening and selections processes.

3. An applicant or candidate, internal or external, who refuses to submit a **Pre-Hire Adult Immunization and Testing Form** will be removed from further consideration.

4. An individual may have pre-employment required immunizations and the **Pre-Hire Adult Immunization and Testing Form** completed by a health care provider of their choice and submit proper written documentation to the Wellness 360 Clinic or they may obtain the immunizations directly from the Wellness 360 Clinic at no charge to the individual. The Wellness 360 Clinic will complete the Pre-Hire Adult Immunization and Testing Form only; an office visit will not be conducted. The department extending an offer to an individual is responsible for payment related to obtaining the required immunizations.

5. In the event that an individual has started work pending completion and submission of a **Pre-Hire Adult Immunization and Testing Form**, the individual will be removed from duty without pay until the form is complete and the individual is deemed fit for employment. The individual will be given five (5) days to provide the required documentation and obtain approval from the Wellness 360 Clinic or they will be terminated from employment or the training program.

6. At a minimum, individuals must receive the following pre-employment immunizations, with appropriate written documentation and completion of the **Pre-Hire Adult Immunization and Testing Form**.

   a. Tuberculosis (TB Screening)

      i. A Tuberculin Skin Test (TST) with negative results, but using the Mantoux technique (with PPD intradermally applied) within the past 12 months;

      ii. A whole blood interferon gamma release assay (IGRA) from a documented Quantiferon TB Gold In-Tube test or T-Spot TB test within the past 12 months; or

      iii. Provide written documentation of a negative TST or IGRA or a report from a physician indicating that a chest x-ray was taken within the past 12 months and was negative from TB.

      iv. An individual who has never received a TST must undergo 2-step testing.

      v. In the event of a positive TST or IGRA:

         (1) The individual will be scheduled for a TB evaluation.

         (2) Any follow-up, treatment, or referral to the San Antonio Metropolitan Health District will be coordinated and documented by the Wellness 360 Clinic.
Any cost associated with a referral or treatment is the responsibility of the individual; no cost(s) will be paid by UTHSA.

The Wellness 360 Clinic will communicate to Human Resources at hr-employment@uthscsa.edu for staff; the Academic, Faculty, and Student Ombudsperson/ADA Compliance Office at Blankmeyer@uthscsa.edu for faculty; and the Office of Postdoctoral Affairs atopa@uthscsa.edu for fellows and post docs when these individuals are cleared to begin employment or training.

b. Hepatitis B Immunization

i. Immunization or immunity is required and may be demonstrated by providing any of the following:

1. documentation of three doses of Hepatitis B vaccine in the past AND a positive antibody titer after at least one month from the third vaccine dose;

2. documentation of a laboratory report showing a positive Hepatitis antibody titer in the past; or

3. documentation of the first injection of the vaccine.

ii. For individuals who receive the first injection of the hepatitis vaccine, the Wellness 360 Clinic will schedule the remainder of the series at no charge to the individual.

iii. Individuals who refuse to obtain Hepatitis B vaccine must sign a declination statement.

Additional information regarding Hepatitis B can be found in the Environmental Health and Safety Department's Bloodborne Pathogen Exposure Control Plan.

B. Process

1. Faculty and Staff

a. The hiring authority is responsible for indicating whether a position requires pre-employment immunizations and testing by selecting the appropriate criteria when creating a requisition in the online employment system.

b. For those positions that require pre-employment immunizations and testing, Human Resources will direct candidates to the Wellness 360 clinic for processing.

2. Fellows and Post-Docs

An individual who will be participating in a training program that requires pre-employment immunization and testing will be identified on the Faculty, Fellow, and Student Hire form and/or the Fellowship Award Authorization form and will
be required to have a Pre-Hire Adult Immunization and Testing Form completed approved, and maintained on file with the Wellness 360 Clinic.

3. Visiting Scientists or Clinicians
   a. An individual who has been approved by a department to visit UTHSA is required to provide appropriate written documentation of Tuberculosis (TB) Screening and Hepatitis B Immunization. If the individual refuses to provide these records they will not be allowed to visit the campus.
   b. The department providing the approval for the visiting individual is responsible for verifying and maintaining the documentation of testing and immunization records. The department will ensure the immunization records are reviewed and approved by the Wellness 360 Clinic.
   c. If additional testing or immunizations are required, it will be at the cost of the individual.

4. Wellness 360 Clinic
   a. Within one (1) business day of receiving a Pre-Hire Adult Immunization and Testing Form, the Wellness 360 Clinic will review all forms completed by the Clinic or received from external medical providers. The Clinic will maintain all pre-employment immunizations on file and will communicate to Human Resources at hr-employment@uthscsa.edu for staff, to the Academic, Faculty, and Student Ombudsman/ADA Compliance Office at blankmeyer@uthscsa.edu for faculty, and the Office of Postdoctoral Affairs at opa@uthscsa.edu for fellows and post-docs whether an individual is cleared to begin employment or training.

C. Record Retention
   1. Immunization documentation for applicants or candidates who DO become employees will be maintained by the Wellness 360 Clinic as a permanent record per UTHSA’s record retention schedule.
   2. Immunization documentation for individuals who DO NOT become employees will be maintained by the Wellness 360 Clinic for 2 months and then destroyed.

IV. Definitions

When used in this document with initial capital letter(s), the following words have the meaning set forth below unless a different meaning is required by context.

Antibody Titer – a blood test which can demonstrate immunity or susceptibility to certain diseases, such as measles, rubella, varicella, and hepatitis B

PPD – a tuberculin skin test using purified protein derivative.
Written Documentation – Photocopy of a medical record or immunization record signed by a physician, nurse, or health care provider, which may not be signed by the individual submitting the pre-employment assessment.

V. Related References

Environmental Health and Safety Department
TB Exposure Control Plan
Frequently Asked Questions

Centers for Disease Control (CDC)
Healthcare Worker Vaccination Recommendations (2009)

The Joint Commission
Standard 1C.02.04.01, Influenza Vaccination Recommendations (2009)

VI. Review and Approval History

A. The approving authority of this policy is the University Executive Committee.

B. The review frequency cycle is set for three years following the last review date, a time period that is not mandated by regulatory, accreditation, or other authority.

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