I. 8.5.8 Pre-Employment & Recurring Immunization Requirements

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<th>Chapter 8 - Health &amp; Safety</th>
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<tr>
<td>Section: 8.5 Environmental Health and Safety Office</td>
<td>Date Last Reviewed: July 2024</td>
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<td>Responsible Entity: Vice President for Facilities and Capital Planning</td>
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II. Purpose

To protect the health and safety of patients, employees, trainees, and the community by minimizing the risk of vaccine-preventable diseases, this policy addresses the requirements and administration of pre-employment and annual immunizations set by state and federal law, the Centers for Disease Control (CDC), and the U.S. Department of Health and Human Services (HHS).

III. Scope

This policy applies to all employees (including faculty, staff, post-docs, and clinicians) and trainees (whether paid or unpaid, such as fellows and visiting scholars) who are referred to as Workforce Members. These individuals serve in healthcare settings (both clinical and research) where there is a potential for direct or indirect exposure to patients or infectious materials. This includes exposure to body substances (e.g., blood, tissue, and specific body fluids), contaminated medical supplies, devices, equipment, environmental surfaces, or air.

Workforce Members involved in animal research, microbiology laboratories, or food services may be required to undergo additional immunizations and testing. Furthermore, those working at the UT Health San Antonio Multispecialty and Research Hospital and/or the Hospital Outpatient Department Clinics (referred to as Hospital Workforce Members) are also required to have additional immunizations.

While students, observers, volunteers, and contractors may need immunizations and testing, they are not governed by this Policy.

UT Health San Antonio (UTHSA) Workforce Members who provide services at other healthcare institutions (such as Audie Murphy Memorial Veterans' Hospital or University Health) may also be required to comply with the other institution’s immunization or infectious disease prevention requirements.
IV. Policy

A. Immunization Program Management

1. The Wellness 360 Clinic is responsible for the execution of UTHSA's immunization program, including communication, documentation, record-keeping, and monitoring functions.

2. Through new employee processing, Wellness 360 will ensure that newly hired Workforce Members and Hospital Workforce Members are in compliance with this Policy. Workforce Members will not be allowed to be employed without confirmation from Wellness360 that immunization requirements have been satisfied.

3. Wellness 360 Clinic shall maintain current records of the Workforce Member's immunization status and related clinical documentation, in accordance with all applicable state and federal laws, and will only disclose immunization information in accordance with law.

B. Administration of Immunization Requirements

1. A pre-employment Immunization and Testing Form must be completed and submitted to Wellness 360 for any internal or external candidate, who is under final consideration.

2. An internal or external candidate, who refuses to complete or submit an Immunization and Testing Form will be removed from further consideration.

3. An individual may have pre-employment required immunizations and the Immunization and Testing Form completed by a health care provider of their choice. Individuals are encouraged to obtain required immunizations directly from the Wellness 360 Clinic. All required Written Documentation must be submitted to the Wellness 360 Clinic. The Wellness 360 Clinic will only administer vaccines and complete the Immunization and Testing Form. The hiring department is financially responsible for all expenses related to obtaining the required immunizations.

4. Workforce Members working in the UTHSA Multispecialty and Research Hospital or Hospital Outpatient Department Clinics (Hospital Workforce Members) cannot start employment without completion of the required immunizations per this Policy.

5. Workforce Members who begin to perform their job duties without the completion and submission of the Immunization and Testing Form will be immediately removed from duty until the form is completed and the individual is deemed fit for employment. The individual will be given five (5) calendar days to provide the required Written Documentation and obtain approval from the Wellness 360 Clinic, or they will be terminated from employment or the training program.

C. Required Immunizations

1. Workforce Members must receive the following pre-employment immunizations and recurring immunization requirements, or have proof of having received, with
appropriate Written Documentation and completion of the Immunization and Testing Form.

a. Tuberculosis (TB Screening)

b. Hepatitis B Immunization
   i. Individuals who refuse to obtain Hepatitis B vaccine must sign a Hepatitis B Virus (HBV) Vaccine Declination Form. Information regarding Hepatitis B can be found in the UTHSA's Environmental Health and Safety Department's Bloodborne Pathogen Exposure Control Plan.

c. Hepatitis A Immunization - Food service personnel only, if applicable

d. Meningococcal Immunization - Microbiology laboratory personnel

2. Hospital Workforce Members must receive the following pre-employment immunizations and recurring immunization requirements, or have proof of having received, with appropriate Written Documentation and completion of the Immunization and Testing Form. A titer can be utilized in lieu of written proof for TDAP, MMR, and Varicella.

a. Tuberculosis (TB Screening)

b. Hepatitis B Immunization
   i. Individuals who refuse to obtain Hepatitis B vaccine must sign a Hepatitis B Virus (HBV) Vaccine Declination Form. Information regarding Hepatitis B can be found in the UTHSA's Environmental Health and Safety Department's Bloodborne Pathogen Exposure Control Plan.

c. Influenza: All Hospital Workforce Members shall receive one dose of influenza vaccine annually during influenza season by the established deadline.

d. Tetanus, Diptheria and Pertussis (TDAP)

e. Measles, Mumps and Rubella (MMR)

f. Varicella

g. COVID-19: COVID-19 vaccination is recommended by the Centers for Disease Control and Prevention (CDC) for all healthcare workers. UTHSA strongly encourages all Hospital Workforce Members to follow CDC recommendations for COVID-19 vaccines.

h. Hepatitis A Immunization - Food service personnel only, if applicable

i. Meningococcal Immunization - Microbiology laboratory personnel

D. Pre-Employment Process

1. Faculty, Staff, and Clinicians

   a. Job Requisitions.
      i. Positions that have the potential for direct or indirect exposure to patients or infectious materials, including body substances (e.g., blood, tissue, and specific body fluids); contaminated medical supplies, devices, and
equipment; contaminated environmental surfaces; or contaminated air require pre-employment immunizations and testing.

ii. The hiring leader is responsible for indicating in the job requisition that the position requires pre-employment immunizations and testing.

b. Human Resources will direct candidates to the Wellness 360 clinic for processing (immunizations and testing).

c. All Workforce Members must comply with this Policy prior to hire and then annually thereafter. If the Immunization and Testing Form is not on file for a Workforce Member within the prior 12 months, the form will be required to be submitted by the Workforce Member for compliance with this policy.

d. If a Hospital Workforce Member fails to comply with the immunization requirements, they will be placed on leave without pay with the possibility of termination from employment.

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 in Team Dynamix and/or the Fellowship Award Authorization form and will be required to have an Immunization and Testing Form completed, approved, and maintained on file with the Wellness 360 Clinic.

3. Visiting Scholars

a. Any 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 Visiting Scholars qualifies as a Hospital Workforce Member, they will also be required to comply the immunization requirements outlined in this policy. If the individual declines to follow these stipulations they will not be allowed to visit the UTHSA.

b. The department will ensure the Written Documentation provided by the individual is submitted to Wellness 360 Clinic for review and clearance.

c. If additional testing or immunizations are required, the visiting scholars will be responsible for the charges at the time services are provided.

4. Wellness 360 Clinic

Within one (1) business day of receiving an Immunization and Testing Form, the Wellness 360 Clinic will review the documentation. Wellness 360 will communicate the individual’s clearance status as follows: staff, to Human Resources at careers@uthscsa.edu; for faculty, the School’s faculty affairs decanal designee; and fellows and post-docs, the Office of Postdoctoral Affairs at opa@uthscsa.edu.

E. Reasonable Accommodation for Immunizations

A reasonable accommodation is an exemption from the required immunizations referenced in this Policy or a change in the work environment that does not create an undue hardship to UTHSA or pose a direct threat to the health and safety of others.
Workforce Members seeking a reasonable accommodation from immunizations due to a medical contraindication or medical condition or because of a sincerely held religious belief, observance or practice must submit a Request for Accommodation Form. The employee will need to submit the Request for Accommodation Form to our leave administration vendor and notify their HR partner regarding this request. If the accommodation is approved, then it must be resubmitted annually.

If the Hospital Workforce Member has a valid exemption, a pending accommodation request, or an approval to temporarily delay vaccinations, then the Hospital Workforce Member will be required to use other protective measures as designated by UTHSA. These protective measures will be provided by UTHSA and may include, but are not limited to, Personal Protective Equipment (PPE), testing, job reassignment, physical distancing, and/or source control.

Hospital Workforce Members who provide healthcare services remotely (full-time) and who do not have any contact with patients and/or other healthcare workers must submit a Request for Accommodation Form to request an exception to the immunization requirements.

F. Record Retention

1. Immunization documentation for applicants or candidates who 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 two (2) months and then destroyed.

V. Definitions

When used in this document, 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 TDAP, measles, rubella, varicella, and hepatitis B.

Hospital Workforce Member – Workforce Members who work in the UT Health San Antonio Multispecialty and Research Hospital and/or the Hospital Outpatient Department clinics. Hospital Workforce Members may include, but are not limited to physicians, nurses, therapists, trainees, research personnel, and those individuals not directly involved in patient care (i.e. housekeeping personnel and biomedical service personnel).

PPD – a tuberculin skin test using purified protein derivative.

Workforce Member – employees (faculty, staff, post-docs, and clinicians) and trainees (paid or unpaid students, fellows, and visiting scholars) serving in a healthcare setting (clinical or research) with the potential for direct or indirect exposure to patients or infectious materials, including body substances (e.g., blood, tissue, and specific body fluids);
contaminated medical supplies, devices, and equipment; contaminated environmental surfaces; or contaminated air.

**Written Documentation** - photocopied of a medical record and/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. The record shall, at a minimum, document the date of the immunization, name of immunization, and address of where the immunization was received.

VI. Related References

**Institutional Handbook of Operating Policies**

7.10.4 Visiting Scholars

**Environmental Health and Safety Department**

Immunization and Testing Form  
Bloodborne Pathogen Exposure Control Plan  
Hepatitis B Virus (HBV) Vaccine Declination Form  
Fellowship Award Authorization Form

**Human Resources**

American with Disabilities Act - Request for Accommodation

**Centers for Disease Control (CDC)**

Healthcare Worker Vaccination Recommendations (2009)

**The Joint Commission**

Standard 1C.02.04.01, Influenza Vaccination Recommendations (2009)
VII. Review and Approval History

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

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