



I. 8.5.8 Pre-Employment & Recurring Immunization Requirements

Chapter 8 - Health & Safety	Original Effective Date: September 2014
Section: 8.5 Environmental Health and Safety Office	Date Last Reviewed: January 2025
Responsible Entity: Vice President for Facilities and Capital Planning	Date Last Revised: January 2025

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

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

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 are in compliance with this Policy. Workforce Members will

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not be allowed to begin work 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 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

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

D. Pre-Employment Process

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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.

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 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. Vaccine Declinations

1. Individuals Who Decline Vaccinations

a. Individuals may decline to receive vaccination(s) for one or more Designated Diseases for reasons of conscience, including religious beliefs, or due to medical

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conditions identified as contraindications or precautions by the Centers for Disease Control. Individuals must decline vaccination(s) according to the procedures described in this policy.

- b. Individuals may not decline to receive vaccination(s) for Designated Diseases due to medical conditions other than those identified as contraindications or precautions by the CDC, except that individuals who have a disability may request an exemption from immunization requirements as a reasonable accommodation under the Americans with Disabilities Act. Individuals who wish to request an exemption from immunization requirements as a reasonable accommodation due to a disability must submit a Request for Accommodation Form to the UT Health San Antonio leave administration vendor and notify their Human Resources partner regarding the request. If the accommodation is approved, then it must be re-submitted annually.

2. Specific Procedures for Declining Vaccinations

- a. Individuals who decline to receive vaccination(s) due to medical conditions identified as contraindications or precautions by the CDC must notify Wellness 360 in writing in the time and manner prescribed by Wellness 360. A Declination Form must be completed and submitted to Wellness 360 and be accompanied by acceptable medical documentation from a licensed practitioner verifying the particular contraindication(s) relied upon.
- b. Individuals who decline to receive vaccination(s) for reasons of conscience, including religious beliefs, must notify Wellness 360 in writing in the time and manner prescribed by Wellness 360. The written Declination Form will be available through Wellness 360 and must include a description of the reason for declination.
- c. Wellness 360 will maintain a confidential record of all individuals who decline vaccination(s), including all written declination notices and supporting documentation. Wellness 360 will also keep a record of any appropriate measures to protect patients that must be followed by unvaccinated individuals.

3. Discrimination and Retaliation Prohibited

UTHSA will not discriminate or retaliate against an individual who is exempt from the required vaccinations due to contraindications or precautions identified by the Centers for Disease Control and Prevention or by the State of Texas Declination for vaccination. The required use of protective medical equipment, such as gloves and masks, may not be considered a retaliatory action.

4. Disciplinary Action for Non-Compliance

Individuals who fail to comply with any provision of this policy, including unvaccinated individuals who fail to take appropriate measures to protect patients, may be subject to disciplinary action up to and including dismissal or termination.

F. Record Retention

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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 the context.

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

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 - photocopy 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)

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VII. Review and Approval History

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

Effective Date	Action Taken	Approved By	Date Approved
09/2014	Policy Origination		
09/2018	Policy Revision		
05/2021	Policy Revision/Discretionary Edits		
07/2024	Policy Revision	Executive Committee	07/16/2024
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