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Owner Colleen Huelskamp  
Area Medical Staff Policy  
Applicability Inova Health System  
References CAP GEN LAB SAFETY MANUAL, Covid 19, Immunization + 1 more

## IHS Mandatory Immunization Policy For Medical Staff

**Inova policies and procedures are confidential and should not be shared outside Inova, including with any third party vendor or organization, unless authorized by leadership.**

### Policy:

This policy defines the requirements for mandatory documentation of MMR, Varicella, Tdap and Hepatitis B immunization, TB diagnostic test and TB Risk Assessment for medical staff and APP of: 1) an Inova Health System Hospital ; 2) Employed/Inova Medical Group; and 3) Contracted clinical personnel. The scope of the policy applies to all new and current Inova medical and APP as outlined in the table below. Medical staff personnel and APP outlined in this policy who has patient contact must adhere to the mandated guidelines that are established through this policy.

### Purpose:

In order to reduce the risk of medical staff personnel and APP being infected or acting as vectors of disease to patients, the following policies on Measles, Mumps and Rubella (MMR), Varicella, Tdap, Hepatitis B immunizations and Tuberculosis (TB) have been established.

### Applies to:

All medical staff and APP credentialed with medical staff membership and/or clinical privileges or job descriptions with Inova. Following is a table outlining medical staff and APP this policy applies to.

**Definitions of Terms: (with exception of COVID 19 vaccines/booster, which is required for all team members)**

OU	IAH	IFH	IFOH	IMVH	ILH	IMG
HOUSE	NA	YES	NA	YES	NA	NA
PROVISIONAL	YES	NA	NA	NA	NA	NA
VISITING FACULTY	NA	YES	NA	NA	NA	NA
ACTIVE	YES	YES	YES	YES	YES	YES
COURTESY	YES	YES	YES	YES	YES	NA
APP	YES	YES	YES	YES	YES	YES
AFFILIATED PHYSICIAN	NO	NO	NO	NO	NO	NA
TELEMEDICINE	NO	NO	NO	NO	NO	NA
MMR	Measles (Rubeola), Mumps and Rubella (German Measles) are viral diseases that has a combined vaccination available, which consists of a two-part series. Documentation of completion of the two-part series immunization or immunity titers required.					
Varicella Zoster	Also known as chicken pox or shingles. Varicella is a viral illness that has a vaccine available, consisting of a two-part series. Documentation of completion of the two-part immunization series or positive immunity titers required. Zostavax is not accepted by CDC for chickenpox immunity at this time.					
Tdap for Pertussis	Pertussis (whooping cough) is an infectious bacterial disease that requires a one-time Tdap booster after age 11. Pertussis immunity titers are not accepted.					
Hepatitis B	A blood borne virus that infects the liver and if left untreated can lead to chronic carrier state. Vaccination is via three-part series. Three -part vaccination series or positive immunity titers required.					
Tuberculosis (TB)	Infectious bacterial disease that can remain dormant for years in a host. T-Spot or Quantiferon Gold IGRA Test					
Influenza	Viral infection of the respiratory passages. Annual vaccination required between Oct 1 - March 31.					
COVID 19	Documentation of completion of the two-part immunization series Pfizer or Moderna or one-part J & J vaccine Plus a Booster (Any other vaccine series authorized for EUA use by the FDA or WHO)					

## Expected Outcomes:

All medical staff and APP will provide proof of immunity or complete vaccination for MMR, Varicella, Tdap and Hepatitis B and TB diagnostic test and TB Risk Assessment. A TB education program will be mandatory for all medical staff and APP at initial appointment and thereafter. These measures are to serve as a prevention strategy in case of a communicable disease outbreak at any Inova facility. Proof of immunity or vaccination should be provided by official documents such as a physician's office, clinic or laboratory letterhead. An annual influenza vaccine is required.

# Procedure:

## 1. Current Clinical Members of the Medical Staff and APP

- a. Measles, Mumps and Rubella (MMR) - All Inova Medical Staff and APP will be required to provide proof of Measles, Mumps and Rubella immunity. Proof of immunity will serve as a condition of medical staff membership and maintenance of clinical privileges unless a valid medical or religious reason precludes vaccination. Medical staff will need to demonstrate:
  - i. Laboratory evidence of MMR immunity based on antibody titers from an accredited Laboratory OR
  - ii. Physician/clinic documentation of two MMR vaccinations.
- b. Varicella – All Inova Medical Staff and APP will be required to provide proof of Varicella immunity. Proof of immunity will serve as a condition of medical staff membership and maintenance of clinical privileges unless a valid medical or religious reason precludes vaccination. Medical staff will need to demonstrate:
  - i. Laboratory evidence of Varicella immunity based on antibody titers from an accredited Laboratory OR
  - ii. Physician/clinic documentation of two of Varicella vaccinations.
- c. Tdap for Pertussis - All Inova Medical Staff and APP will be required to provide proof of up to date Pertussis immunity. Proof of immunity will serve as a condition of medical staff membership and maintenance of clinical privileges unless a valid medical or religious reason precludes vaccination. Medical staff will need to provide:
  - i. Physician/clinic documentation of one-time Tdap booster after age 11.
- d. Hepatitis B - All Inova Medical Staff and APP will be required to provide proof of Hepatitis immunity. Proof of immunity will serve as a condition of medical staff membership and maintenance of clinical privileges unless a valid medical or religious reason precludes vaccination. Medical staff will need to demonstrate one of the below;
  - i. Physician/clinic written documentation of a complete >3-dose Hepatitis B vaccine series OR a post-vaccination anti-HBs >10 mIU/mL (titer to be collected 1-2 months after administration of the last dose of the vaccine series).
  - ii. Physician/clinic written documentation of 2 dose HeplisaV B
  - iii. Positive titer.
- e. Influenza-- All Inova Medical Staff and APP will be required to provide proof of an annual influenza vaccination by the established due date if they will be performing IP services between October 1 and March 31.
  - i. For Doctors or APP applying for privileges they must be compliant if they have an application in process on September 1.
- f. Tuberculosis- All Inova Medical Staff and APP will be required to complete

Tuberculosis screening which includes the following; diagnostic test, a risk assessment and Medical Staff Education. All medical staff will have to provide results and documentation at the time of an initial appointment. Education will be required by all Medical Staff Members and APP.

- i. Medical Staff and APP will need to demonstrate a negative screening of a blood test (IGRA Interferon-Gamma Release Assay) and be within 6 weeks of submitting the most current application request form to the Inova Health System Central Credentialing Office.
- ii. a Risk Assessment—at privilege approval and prior to start date.
- iii. a chest x-ray may be included based on applicant's history and test results.
- iv. a TB training program for All Medical Staff and APP will be required at Initial appointment and thereafter
- v. Prospective team members exempt from IGRA testing are those who have a documented history of a previous positive IGRA or TST and/or documentation of prophylaxis treatment for Latent TB Infection. These individuals will be required to have a chest x-ray unless they can provide documentation of a negative chest x-ray within the previous 12 months.
- vi. Members who have a first-time positive TB screening shall be required to provide documentation to the Credentialing Office of a negative chest x-ray and follow up with their Inova Team Health.
- vii. Pregnancy is not a contraindication for the IGRA/TST.
- viii. History of BCG vaccinations is not a contraindication for the IGRA/TST.
- g. COVID 19 Vaccine requirements:
  - a. Pfizer Vaccine-Documentation of 2 vaccines at least 21 days apart.
  - b. Moderna Vaccine- Documentation of 2 vaccines at least 28 days apart.
  - c. Johnson & Johnson- Documentation of 1 vaccine.
  - d. Any other vaccine authorized for EUA use by the FDA or WHO.
  - e. Vaccine requirements are subject to change based on updated guidelines from FDA and/or WHO.
  - f. COVID Vaccines given outside the US:
    - i. People who received all or some of the recommended doses of a COVID-19 vaccine that is neither authorized by FDA nor listed for emergency use by WHO may be offered a complete FDA authorized or WHO listed COVID-19 vaccine series.
    - ii. The minimum interval between the last dose of a non-FDA authorized vaccine or a non –
    - iii. WHO listed vaccine and an FDA authorized or WHO listed COVID-19 vaccine is 28 days. Only people who have received all recommended doses of an FDA authorized or WHO listed COVID-19 vaccine are considered fully vaccinated. (CDC.gov,

June 2021).

- g. Booster doses-As of April 4, 2022, all existing and new team members, in all medical staff categories, must have documentation of their completed the primary COVID-19 vaccine series and, if eligible, their booster vaccine, or an approved exemption by their hire date.
- Team members returning from an approved leave of absence, administrative suspension or suspension must have completed the primary vaccination prior to returning to work. Booster dose guidelines are subject to change based on best available evidence.
  - Pfizer-BioNTech or Moderna (mRNA COVID-19 vaccines) are preferred unless the team member had a severe reaction after an mRNA vaccine dose or who have a severe allergy to an ingredient of Pfizer-BioNTech or Moderna (mRNA COVID-19 vaccines). Team members are permitted to obtain vaccination from a third-party (such as their private healthcare provider, pharmacy, or state agency administering vaccines). Team members who obtain a vaccination from a third-party will be considered vaccinated under this policy upon providing proof of vaccination as set forth below. Documentation Required:
- i. Copy of CDC COVID-19 vaccine card documenting type of vaccine and date(s) of administration,
  - ii. A signed and current immunization consent form on official letterhead showing the type of vaccination and date(s) of administration,
  - iii. Immunization record from provider showing the type of vaccination and date(s) of administration,
  - iv. Receipt containing type of vaccination and date(s) of administration,
  - v. Official documentation from a government health agency containing type of vaccination and date(s) of administration, **or**
  - vi. Military immunization record, containing type of vaccination and date(s) of administration.

## Exemptions:

Those who have a valid medical or religious exemption and/or who decide not to get vaccinated because of current pregnancy or breast feeding are required to complete a Vaccine Exemption Request Form (contact your **Medical Staff Office Team for current Request form**) and submit to [ExemptionRequests@inova.org](mailto:ExemptionRequests@inova.org) for processing.

**Note:** All exemption requests must be accompanied by either a letter from your provider for medical exemptions or a letter from your religious affiliate for religious exemptions to be considered for approval.

1. Not Attestations of Records will be accepted.
2. Vaccination and titers will be offered free of charge when administered by Inova Health

System Team Health Office.

3. Any applicant that is not able to provide proof of immunization or has negative antibody titers will be required to receive his/her first dose of the vaccination(s) before Central Credentialing can release file for Medical Staff Committee approvals.

**4. New Members of the Medical Staff and APP**

1. All new Inova Medical Staff and APP must provide acceptable documentation of MMR, Varicella, Tdap and Hepatitis B immunity TB diagnostic test, TB Risk Assessment, Flu Vaccine and COVID 19 per above criteria. Applicants must receive appropriate vaccination unless a valid medical or religious reason precludes vaccination. Members will need to demonstrate laboratory evidence of immunity based on antibody titers, OR physician documented vaccination.
2. New members of the medical staff who have not secured an exemption or updated their immunization status by their start date will delay their appointment until vaccination requirements or exemption requests have been met. If not provided 180 days post application signature, medical staff appointment hospital application will be deemed to have been withdrawn.

**5. Existing Medical Staff Members**

1. All existing Active or Courtesy Category doctors or APP's who have previously demonstrated compliant at one Inova Health System Hospital will be considered compliant for any additional request for membership at another Inova Health System Hospital.

**6. Vaccine Shortage**

1. If Inova is found to have a vaccine shortage, Inova may temporarily delay or suspend the vaccination requirement for medical staff.
2. In the event of a vaccine shortage with some vaccine available, the situation will be evaluated on an individual basis and the vaccine will be administered in a tiered fashion with priority given to OB/GYN, Pediatrics and ED medical employees.

**7. Exemption requests for medical and/or religious purposes**

1. Exemption to immunization may be granted for medical contraindications or religious beliefs. Medical reasons that may preclude vaccination of MMR and Varicella include immunocompromised status, chronic immunosuppressive therapy, active and untreated Tuberculosis, or a history of anaphylaxis or severe adverse side effect when receiving the same vaccine.
2. Exemption approval or denial will be based upon documentation submitted by the individual in accordance with established guidelines.
3. Exemption request must be accompanied by;
  - a. Medical Staff Exemption request forms (must be obtained through Central Credentialing or Medical Staff Office)
  - b. Individuals requesting exemption due to medical contraindications must provide proof in the form of a letter from their personal primary care physician (on his/her professional business letterhead) documenting the



medical contraindication.

- c. Individuals requesting a religious accommodation must provide a letter from clergy (on his/her professional letterhead) supporting exemption as documentation.
- d. Current immunization status/ shot records; to include MMR titers, Hepatitis B titers, Tdap after age 11, T-Spot diagnostic test, TB Risk Assessment and Chest X-ray within 12 months (if x-ray is applicable)

#### 8. Process for Exemption Approval

- 1. Religious exemption will be evaluated by CMO of each hospital or the System CMO for individuals with ambulatory privileges.
- 2. If exemption is granted for a permanent condition the individual's name will be kept on file at Team Health in case of a future exposure.
- 3. If not granted: The individual will be expected to adhere to vaccination requirements.

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### Approval Signatures

Step Description	Approver	Date
Medical Staff Presidents Final Approval	Eric Reines: Physician [LR]	4/29/2022
Medical Staff Presidents Final Approval	Cameron Olderog: Physician	4/20/2022
Medical Staff Presidents Final Approval	Stuart Sheifer: Physician	3/23/2022
Medical Staff Presidents Final Approval	Eyad Abu-Hamda: Intensivist	3/22/2022
Medical Staff Presidents Final Approval	Ali Moshirfar: Physician	3/22/2022
	Colleen Huelskamp: Avp Medical Staff Services	3/17/2022

### References

CAP GEN LAB SAFETY MANUAL, Covid 19, Immunization, Mandatory immunization