

Healthcare Personnel (HCP) Vaccination

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Healthcare Personnel (HCP)

- All employees who work in a healthcare facility, regardless of their job category
 - Including but not limited to:
 - Physicians
 - Nursing assistants
 - Clerical
 - Dietary
 - Security
 - CHRs
 - Contractors and volunteers
 - Nurses
 - Pharmacists
 - Housekeeping
 - Maintenance
 - Billing
 - Ambulance crews

Vaccine Recommendations for HCP

- HCP are recommended to receive several vaccines
- To protect themselves
- To protect their patients
- Vaccines recommended for HCP
 - Hepatitis B (certain HCP)
 - Influenza
 - MMR (protects against Measles, Mumps and Rubella)
 - Varicella (aka Chickenpox)
 - Tdap (protects against pertussis, or whooping cough)

Impact of Flu

- Influenza is a serious disease
- Every year between 3,000 and 49,000 people die from influenza
- Over 200,000 people are hospitalized from influenza-related complications
- American Indian/Alaska Native people are at high risk for influenza and influenza-related complications
 - 2009 H1N1 pandemic – mortality rates 4x higher compared to other groups
 - 1.5 - 2x mortality rate compared to whites in other years
- Influenza vaccine is the best way to prevent influenza-related illness

CDC Influenza Website – www.cdc.gov/flu

IHS Influenza Website – www.ihs.gov/flu

Why get vaccinated?

Patient Safety

Why get vaccinated?

To protect patient safety

Rationale for IHS Requirement for HCP Influenza Vaccination

- Influenza vaccine recommended for HCP since 1984
- Documented transmission and outbreaks of influenza in hospitals and nursing homes
- HCP have frequent contact with patients
 - Many at high risk of complications from influenza and who may be less likely to respond to vaccination themselves
- Can shed influenza virus 1 day BEFORE symptoms
- HCP work while ill
- Benefits of HCP vaccination include
 - Reduces patient risk
 - Reduces absenteeism/costs
 - Reduces infection among staff

Recommended Components of HCP Flu Vaccination Program

- Educate HCP regarding the benefits of influenza vaccination
- Offer influenza vaccine annually
- Provide influenza vaccination to HCP at the work site and at no cost
- Monitor HCP influenza vaccination coverage at regular intervals during influenza season

HCP Influenza Vaccination in IHS

- Mandatory tracking and reporting of HCP Influenza vaccination at all IHS sites since 2008-09 season
 - Tracking of HCP flu vaccination also required by CMS and Joint Commission
- IHS and Tribal sites offer free influenza vaccine on site for HCP
 - Vaccination clinics, Mobile Carts

Influenza Vaccination of HCP

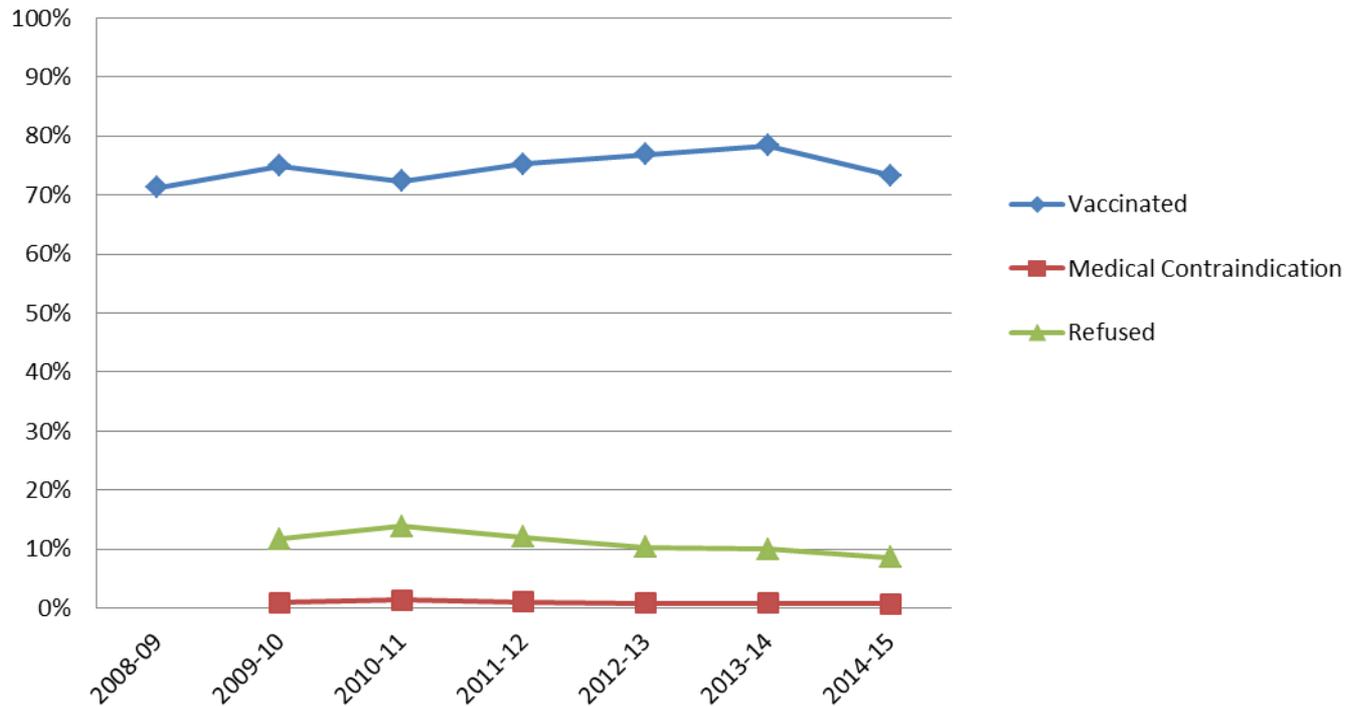
- Healthy People 2010 Goal: 60%
- Healthy People 2020 Goal: 90%

1. Prevention and Control of Influenza: Recommendations. CDC.MMWR. 2007;56(RR-6):1-54

<http://www.cdc.gov/mmwr/PDF/rr/rr5606.pdf>

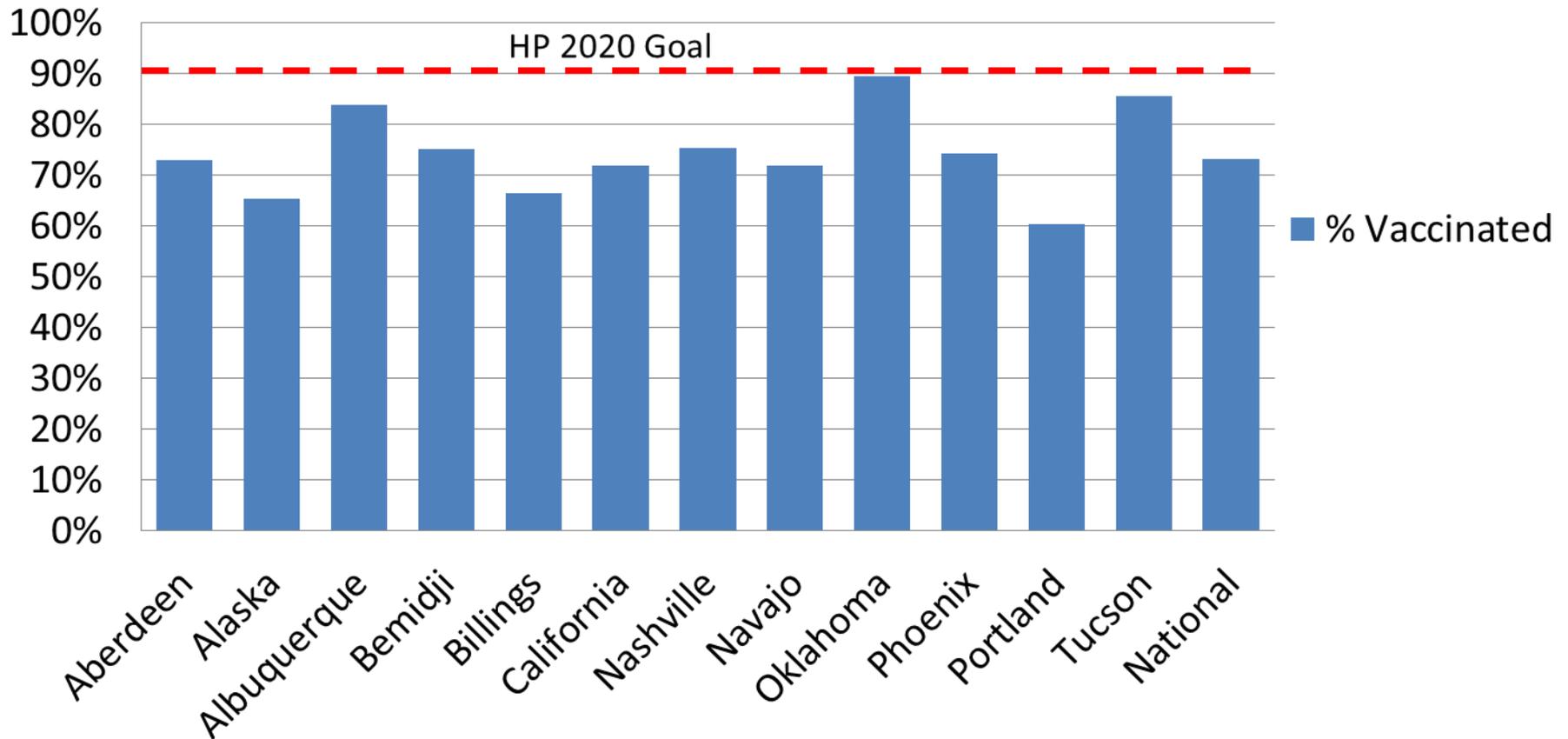
IHS HCP Influenza Vaccine Coverage

Healthcare Personnel Seasonal Influenza Vaccine Coverage
2008 - 2014*



* Provisional Data as of Dec. 31st, 2014

IHS HCP Influenza Vaccine Coverage by Area 2014-2015



To Mandate or Not To Mandate?

- Over 500 hospitals, clinics and health organizations have mandated influenza vaccine for HCP
 - Including some Tribal organizations
 - Several states
- Department of Defense mandates influenza vaccine for military AND civilian HCP
- National Institutes of Health mandates influenza vaccine for HCP
- Studies from several large hospitals and health systems show increases in HCP influenza vaccination rates
 - Medical Exemptions only
 - Medical or religious/philosophical exemptions
- Consequences of non-vaccination vary:
 - Termination
 - Re-assignment
 - Masking during influenza season
 - Declination form
 - Unpaid leave during influenza outbreaks

Immunization Action Coalition: Influenza Mandate Honor Roll

<http://www.immunize.org/honor-roll/influenza-mandates/honorees.asp>

To Mandate or not to Mandate?

- National Vaccine Advisory Committee recommendation:
 - For sites that have implemented comprehensive voluntary, free HCP influenza vaccination programs and have not achieved the HP 2020 goal, NVAC recommends health care entities (HCE) “strongly consider an employer requirement for influenza immunization. In addition to medical exemptions, HCE may consider other exemptions in their requirement policies. NVAC also recommends that . . .this recommendation is implemented in HHS facilities and services (including the Public Health Service, HHS staff who are HCP and Federally Qualified Health Centers) ...

Recommendations on Strategies to Achieve the Healthy People 2020 Annual Influenza Vaccine Coverage Goal for Health Care Personnel

http://www.hhs.gov/nvpo/nvac/influenza_subgroup_final_report.pdf

To Mandate or not to Mandate?

- CDC - Study on HCP influenza vaccine coverage for 2012-2013:
 - Vaccination requirements, vaccination promotion, and access to vaccination at no cost to the HCP for ≥ 1 days were associated with higher vaccination coverage among HCP
- American Academy of Pediatrics Position Statement
 - Mandatory influenza immunization for all health care personnel is ethical, just, and necessary to improve patient safety. It is a crucial step in efforts to reduce health care–associated influenza infections.
 - Full position statement available at:
<http://pediatrics.aappublications.org/content/136/4/809.full.pdf+html>

Support for HCP Influenza Vaccination Mandates

- American Academy of Pediatrics
- American Academy of Family Physicians
- American College of Pharmacists
- American Hospitals Association
- Association for Professionals in Infection Control and Epidemiology
- Infectious Diseases Society of America
- And many, many more
 - Position statements available at:
<http://www.immunize.org/honor-roll/influenza-mandates/>

Mandatory Vaccination: Legal precedent

- *Jacobson v. Massachusetts*
 - Upheld the state's right to mandate small pox vaccination on the grounds that the state has the right to limit individual freedom where common welfare is at stake
- *Prince v. Massachusetts*, 321 U.S. 158 (1944)
 - First Amendment's free exercise clause does not insulate an individual's right against the public health and safety of the community
- School Vaccination laws
 - Philosophical/religious exemptions not required
 - *Workman v. Mingo County Schools*
 - The Constitution does not require immunization laws to yield to religious beliefs
 - *Brown v. Stone*, 378 So.2d 218 (Miss. 1979)
 - state Supreme Court holding that religious exemptions violate the rights of those students exposed to others who are not vaccinated due to religious exemptions

IHS Healthcare Personnel Vaccination

- Special General Memorandum (SGM) - directive requiring all healthcare personnel (HCP) working in an IHS healthcare facility to receive annual influenza vaccination by Oct. 31st.
- Signed by the IHS Deputy Director on Sept. 3rd, 2015
- Notice given to the unions on Sept. 9th, 2015
- Pending bargaining obligations
 - Policy cannot go into effect for bargaining unit employees until bargaining is completed
 - Currently awaiting receipt of union proposals