# WSU Health Sciences Vaccination and Health Screening Admission Policy

### Purpose

Washington State University (WSU) Health Sciences programs (Medicine, Nursing, Pharmacy) require students to obtain clinical experiences as part of their academic requirements. This is a fundamental educational requirement to ensure health sciences students can provide high quality and safe patient care and are qualified to become professionally licensed. It is also an accreditation or legal requirement for health sciences educational programs. The vast majority of these clinical experiences occur outside of WSU and within other organizations. These training sites vary from teaching hospitals to skilled nursing facilities, community pharmacies, small physician practices, and many other health care settings. Many patients receiving care within these settings are the most vulnerable in our society, such as patients with chronic medical conditions and co-morbidities including being immunosuppressed, the elderly, communities of color and patients with other social determinants of health.

Training sites, with whom WSU partners, are responsible for ensuring the health and safety of their patients and require workforce members including trainees to undertake certain actions to protect their patients. Many of these safeguards are required by law and accreditation standards, and include, among other things, background checks, drug and health screenings, and/or immunizations.<sup>1</sup> These activities facilitate the safe participation of clinical experiences for students and reduce the risk of causing unnecessary harm to vulnerable patients. Through contractual arrangements, training sites require WSU to only place students within their training site that meet these health and safety requirements. WSU also has independent legal, ethical and risk management reasons for ensuring WSU Health Sciences students meet certain reasonable health and safety standards and training site placement criteria. Being a good partner in training the next generation of the health care workforce is not only reasonable but necessary to ensure continuous clinical experiential learning opportunities for students.

Health screenings and vaccinations are safe and an effective infection prevention practice to keep health care workers and patients healthy and safe.<sup>2</sup> Many training sites are requiring full vaccination and are not allowing any exemptions as a condition for placement. Development and implementation of a consistent health screening and vaccination requirement for WSU Health Sciences programs is reasonable and necessary to meet their legal, accreditation, ethical and contractual requirements.

The unique nature of clinical experiences for learners in health sciences programs compels the adoption of a stricter vaccine requirement than WSU currently requires. This is both an academic requirement for placement in required clinical experiences and a health and safety measure to protect patients. WSU Health Sciences will require—as a condition of admission—certain immunizations and

<sup>1</sup> See e.g., Washington Hospital Licensing Regulations, WAC 246-320-156(6) (requiring "Complete tuberculosis screening for new and current employees consistent with the *Guidelines for Preventing the Transmission of Mycobacterium Tuberculosis in Healthcare Facilities*, 2005. *Morbidity Mortality Weekly Report (MMWR)* Vol. 54, December 30, 2005"); WAC 296-823-13005 (requiring making hepatitis B vaccination series available to all employees who have occupational exposure unless certain conditions met such as previous vaccination series, immune through antibody testing or medically contraindicated).

<sup>2</sup> See Centers for Disease Control and Prevention Vaccination Recommendations for Healthcare Workers.

health screenings. The only exemption to these required vaccinations is students that have a legitimate medical condition that make vaccination medically contraindicated.

## Policy

In accordance with the Centers for Disease Control and Prevention (CDC), recommendations for immunizations for health care workers including students/trainees, and to comply with training site vaccination and health screening requirements, WSU Health Sciences programs with a clinical experiential learning requirement must be vaccinated or show evidence of immunity for the following:

#### COVID-19

- » Boosters may be required based on agency requirements.
- Hepatitis B
  - » Proof of immunity and of proof of vaccination.
- Measles, Mumps and Rubella (MMR)
  » Proof of immunity by titer may be accepted in lieu of proof of vaccination.
- Tdap (Tetanus, Diphteria, Pertusis)
- <u>Tuberculosis screening</u>
  - » There are no exemptions for TB screening.
- Varicella
  - » Proof of immunity by titer may be accepted in lieu of proof of vaccination.
- Influenza (annually)

WSU Health Sciences reserves the right to require additional immunizations in the event of a public health emergency, updated recommendations by the CDC for vaccination and/or health screenings, and/or training site placement requirements.

## Procedure

Each WSU Health Sciences program that admits a student with a clinical experience academic requirement does so on the condition they are fully vaccinated and have completed all required health screenings. Each student is responsible for submitting appropriate medical documentation evidencing vaccination and completing their health screening prior to engagement in any clinical experience. All such documentation must be submitted in accordance with each applicable Health Sciences program requirements including information systems that maintain immunization and health screening information (e.g., CastleBranch). Failure to comply with vaccination and health screening requirements can result in decertification from the program. Existing students in the professional program will be required to follow existing WSU and CPPS vaccination policies.

Students applying for a medical exemption must complete this prior to the start of the academic year in which they have been conditionally admitted. To request a medical exemption requires submission of appropriate documentation from a qualified and licensed health care provider establishing a

vaccination is contraindicated due to an underlying medical condition. Students should submit exemption materials to Cougar Health (<u>https://cougarhealth.wsu.edu/medical-services/specialty-care-and-services/immunizations/required-immunizations/</u>). If the submitted documentation supports a medical exemption, each program will admit the student and allow progression so long as they can reasonably accommodate the student. To the extent such action will cause a direct threat or undue hardship, the program shall deny the student admission.

Students receiving an approved accommodation are not guaranteed a clinical placement, which is a requirement for degree completion. Accommodated individuals must comply with the terms and conditions of the accommodation which may include use of Personal Protective Equipment, donning appropriate masks, and periodic testing/screening. Failure to follow an approved accommodation may subject the student to appropriate corrective action up to and including termination or revocation of the accommodation. A terminated or revoked accommodation may result in the student being referred to the applicable student progress committee for a professionalism violation and/or other reasonable corrective action.

## **Non-Compliance**

Students who do not comply with WSU Health Sciences vaccine or health screening requirements shall not be admitted into or will be decertified from the applicable education program. If there is an ongoing vaccination (e.g., influenza) or health screening requirement, students who are non-compliant will not be able to matriculate in their program or will immediately be removed from a clinical rotation.

## Submission of Information; Falsification of Records

Students submitting vaccination and health screening information, or requesting a medical exemption are required to follow WSU Health Sciences policies and procedures for submitting this information. Failure to comply with these timelines and processes may result in delay or denial of admission to the applicable program. WSU reserves the right to request additional or supporting documentation and information from a student. False, misleading, or inaccurate information submitted pursuant to this policy may result in, among other things, a referral to Center for Community Standards for appropriate investigation and/or discipline. Similarly, submission of false or inaccurate information may be a violation of the law and may result in a referral to appropriate law enforcement agencies or professional licensing boards.

