

COMMONSPIRIT HEALTH ADMINISTRATIVE POLICY

SUBJECT: Seasonal Influenza Vaccination

POLICY NUMBER: Administration A-002

EFFECTIVE DATE: May 14, 2026

**ORIGINAL EFFECTIVE
DATE:** September 15, 2020

☒ National/System Offices

☒ Acute Care Facilities

☒ Non-Acute Care Facilities

PURPOSE

The purpose of this Policy is to define and describe the expectations for annual seasonal influenza vaccination at CommonSpirit Health.

Influenza (flu) is a contagious respiratory illness caused by influenza viruses. The severity of flu can range from mild to very serious, including death. Consequently, the Centers for Disease Control and Prevention (CDC) recommends that generally everyone six (6) months of age and older get vaccinated every flu season.¹

In addition to protection from flu, the seasonal flu vaccine can help mitigate the complications of having two simultaneous viral respiratory infections or two pulmonary infections in a row (e.g., flu and COVID-19).

POLICY

In line with our goals of creating a safe patient environment and experience, and to maintain the health and well-being of our staff and build healthy communities, CommonSpirit requires the seasonal flu vaccine of all employees and non-employed service partners working and providing services in our facilities.

Requirements from state departments of health (DOH) or local public health departments (PHD), as well as applicable federal, state, or local laws, rules, and regulations, that conflict with this Policy supersede those aspects of this Policy (e.g., allowable exemptions from flu vaccination). CommonSpirit entities may impose more stringent requirements with the approval of the System Chief Operating Officer (COO).

APPLICABILITY

This Policy applies to employees and providers of CommonSpirit and its Direct Affiliates² and wholly owned Subsidiaries³ as well as any non-wholly owned Subsidiary or other related entity

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<https://www.google.com/url?q=https://www.cdc.gov/flu/vaccines/vaccinations.html&sa=D&source=docs&ust=1772567145421108&usq=AOvVaw3Z2co5PkVUFGYvoVEIyYIM>

² A Direct Affiliate is any corporation of which CommonSpirit Health is the sole corporate member or sole shareholder, as well as Dignity Community Care, a Colorado nonprofit corporation.

³ A Subsidiary refers to *either* an organization, whether nonprofit or for-profit, in which a Direct Affiliate holds the power to appoint fifty percent (50%) or more of the voting members of the governing body of such organization or holds fifty percent (50%) or more of the voting rights in such organization (as evidenced by membership powers or securities conferring certain decision-making authority on the Direct Affiliate) or any organization in which a

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whose governing documents expressly require or provide for such Subsidiary or entity to comply with CommonSpirit policies. Remote or telework employment status does not eliminate any requirement under this Policy.

This Policy applies to all non-employed providers, clinical staff, non-clinical staff, contracted personnel, vendors, students, trainees, volunteers, or any other worker who provides services on behalf of CommonSpirit or who conducts business in any capacity at a CommonSpirit facility.

All persons to whom this Policy applies shall hereinafter be referred to as "Covered Persons."

REQUIREMENTS

1. Seasonal flu vaccines will be offered and provided by CommonSpirit hospitals and clinics to employees, providers with privileges, and volunteers at no direct cost to the individual. Non-employed service partners are encouraged to reach out to their employer for vaccination availability.
2. Seasonal flu vaccines must be obtained between September 1 and November 1 each year. Employees hired after November 1 have two (2) weeks from their hire date to obtain a flu vaccine.
3. Covered Persons receiving their seasonal flu vaccine must attest to receipt of a seasonal flu vaccine through ReadySet or other identified processes established by CommonSpirit. If influenza vaccination is obtained outside of Employee Health, proof of vaccination must be provided.
4. Covered Persons who do not receive the seasonal flu vaccine must submit a personal declination through ReadySet or other identified processes established by CommonSpirit and comply with masking requirements.
 - a. Covered Persons subject to masking must wear an FDA approved facemask at CommonSpirit facilities and with patients during flu season, including during home visits.
 - b. CommonSpirit will provide facemasks to all Covered Persons subject to masking, including written instructions on proper fitting, use, and removal of face masks.
 - c. Facemasks are worn while at CommonSpirit facilities and with patients (e.g., during home visits).
 - d. Facemasks are worn at all times, except in "mask free zones."
5. Covered Persons who need to be physically present at a facility must comply with that facility's flu vaccination requirements even if those requirements are more stringent than the Covered Person's primary work location.
6. Employed Covered Persons failing to comply with this Policy are subject to corrective action.
7. CommonSpirit reserves the right to prohibit access to its facilities or sites for other non-employed Covered Persons failing to comply with this Policy.

8. All CommonSpirit facilities must have a process in place to identify and monitor compliance with this Policy, including implementation of corrective action when required.
9. CommonSpirit may temporarily waive the requirements of this Policy if there is a shortage of seasonal flu vaccine until supply becomes available.

DEFINITIONS

Influenza (“Flu”) Season: Typically October 1st through March 31st (or as designated by the local PHD).

Mask-Free Zones: The mask-free zones are limited to:

- Cafeteria while eating
- Private administrative offices
- Designated areas as defined by the facility or local PHD

These mask-free zones may be subject to other masking requirements of other applicable policies.

Unvaccinated is defined as: Individuals who are not fully vaccinated against seasonal flu, or for whom vaccine status is unknown or documentation is not provided.

REFERENCES

CDC (2020). *Prevention and Control of Seasonal Influenza with Vaccines: Recommendations of the Advisory Committee on Immunization Practices (ACIP)—United States, 2020-2021*. Retrieved from: <https://www.cdc.gov/mmwr/volumes/73/rr/rr7305a1.htm>

Joint Commission October 8, 2024). Retrieved from: <https://www.jointcommission.org/en-us/knowledge-library/support-center/standards-interpretation/standards-faqs/000002453>