



Deliberative Scenario: Seasonal Influenza Vaccination Policy for a Local Public Health Department

As members of the ethics committee of the public health department for which you work, you have gathered to discuss a request from the Director of Public Health to consider whether your public health department should adopt a policy requiring all employees to receive an annual seasonal influenza vaccine. The Director of Public Health has sent the public health ethics committee the memorandum below.

Dear Public Health Ethics Committee,

Thank you for agreeing to serve on this special purpose committee to assess a possible policy regarding seasonal influenza vaccines.

As you know, immunizations are an important public health intervention for preventing the spread of numerous infectious diseases, including seasonal influenza. In the United States, influenza affects approximately 15% of the adult population each year,¹ and health workers in particular are at a higher risk of exposure to influenza due to direct or indirect contact with affected community members.

At this time, we highly recommend that all of our employees receive a seasonal influenza vaccine every year, but do not require it. We provide convenient means to receive the vaccine through our flu vaccination clinics. These clinics, which visit our Northern and Western Service Centers (as well as the Hastings Administrative Center) six times during work hours in September and October, provide free immunizations for insured persons as well as low-cost (\$35) for employees without health insurance coverage.

The American Public Health Association recommends requiring all health and laboratory workers, as well as students in these areas, to be immunized against all vaccine-preventable diseases.¹ As employees of our local public health department, it is our responsibility to take necessary precautions to protect and preserve the health of our community members, including ourselves.



Last Update: October 30, 2016

I am asking this committee to consider whether our public health department should create and enforce a policy requiring employees to receive an influenza vaccine annually. In your consideration of this request, please consider the broader implications of such a policy, including whether such a policy is necessary, to whom the policy will apply, under what circumstances an employee can exempt themselves from this policy, and how such a policy could be enforced.

Please provide your recommendations to me within 90 days.

Thank you,

Public Health Director

To address this problem comprehensively, you have broadened the group to include staff who have direct client contact (e.g., public health nurses, WIC staff) and staff who do not (e.g., program support). You also include staff members of the disease control and prevention unit, a union representative, state health department employees, and a local hospital's infection preventionist.

Please come to the deliberation having read the following pieces of background information:

- [“Guide to Public Health Deliberation for Public Health Ethics Professionals,”](#) Presidential Commission for the Study of Bioethical Issues.
- [“Annual Influenza Vaccination Requirements for Health Workers,”](#) American Public Health Association.¹
- [AMA Code of Ethics, section 8.7,](#) American Medical Association.²
- [“Nonmedical Exemptions from Immunizations H-440.970,”](#) American Medical Association.³
- [Immunizations Position Statement,](#) American Nurses Association.⁴
- Pearson, M.L., Bridges, C.B., Harper, S.A., *et al.* [Influenza vaccination of health-care personnel.](#)⁵

¹ American Public Health Association (APHA). (n.d.). Annual Influenza Vaccination Requirements for Health Workers. [Webpage]. Retrieved from: <http://www.apha.org/policies-and-advocacy/public-health-policy-statements/policy-database/2014/07/11/14/36/annual-influenza-vaccination-requirements-for-health-workers#Anchor 1>.

² American Medical Association (AMA). (n.d.). AMA Code of Ethics. [Webpage.] Retrieved from <http://www.ama-assn.org/ama/pub/physician-resources/medical-ethics/code-medical-ethics.page>. Accessed on August 26, 2016.



³ “[Nonmedical Exemptions from Immunizations H-440.970.](#)” (2015). American Medical Association. [Webpage]. Retrieved from <https://searchpf.ama-assn.org/SearchML/searchDetails.action?uri=%2FAMADoc%2FHOD.xml-0-3985.xml>. Accessed August 26, 2016.

⁴ “Immunizations Position Statement” (2015). American Nurses Association. [Webpage]. Retrieved from <http://www.nursingworld.org/MainMenuCategories/Policy-Advocacy/Positions-and-Resolutions/ANAPositionStatements/Position-Statements-Alphabetically/Immunizations.html>. Accessed September 15, 2016.

⁵ Pearson, M.L., Bridges, C.B., Harper, S.A., *et al.* (2006). Influenza vaccination of health-care personnel. *MMWR Recommendations and Reports*, 55(RR02), 1-16. Online only. Retrieved from <http://www.cdc.gov/mmwr/preview/mmwrhtml/rr5502a1.htm>. Accessed on September 15, 2016.