

OSHA's Official Position on Flu Vaccination of Healthcare Workers

"The Occupational Safety and Health Administration (OSHA) is strongly supportive of efforts to increase influenza vaccination rates among healthcare workers in accordance with the Healthy People 2020 goals. However, at this time, OSHA believes there is insufficient scientific evidence for the federal government to promote mandatory influenza vaccination programs that do not have an option for the HCP to decline for medical, religious and/or personal philosophical reasons.

While we are supportive of the Healthy People 2020 goal of a 90% vaccination rate, we have seen no evidence that demonstrates that such a high rate is in fact necessary. Furthermore, the current influenza vaccine is no magic bullet. The current state of influenza vaccine technology requires annual reformulation and revaccination and the efficacy is quite variable. Every year there are numerous circulating strains of influenza that are not included in the vaccine. In years where the antigenic match is good, the vaccine only provides protection against the 3 strains in the formulation. In years when the antigenic match is poor, the vaccine may provide no protection at all. The limits of current influenza vaccine technology are especially problematic in the context of a mandatory influenza vaccination program that results in job loss. Lastly, reliance on a mandatory influenza vaccination policy may provide healthcare workers, health care facility management and patients with an unwarranted sense of security and result in poor adherence to other infection control practices that prevent all types of infections, not just influenza. Influenza vaccination has always been just one part of a comprehensive multi-layered infection control program.

While OSHA does not believe that there is sufficient evidence to meet the bar necessary to support mandatory vaccination programs, we nonetheless are convinced that influenza vaccination is generally beneficial and are supportive of efforts to promote vaccination. Influenza vaccination exemptions should be for HCP with valid medical contraindications to vaccinations, or religious and/or personal objections and a signed declination statement that indicates the HCP has been educated regarding influenza, is aware of the risk and benefits of influenza vaccination, has been given the opportunity to be vaccinated with the influenza vaccine at no charge, and can receive the influenza vaccine in the future at no charge to the HCP."