



POLICY ON JOB-RELATED HEALTH REQUIREMENTS

Dated: December 4, 2018

Supersedes: HR.106 *Employment Physical Exam* dated August 5, 2015

I. PURPOSE

To establish standards of health requirements for certain prospective and current employees of New York Medical College (NYMC) in specific, enumerated roles, and for non-NYMC employees who work in a NYMC laboratory or in the NYMC Department of Comparative Medicine.

Standards in this policy are in accordance with Occupational Safety and Health Administration (OSHA) Title 29 of Code of Federal Regulations 29 CFR 1910.1030, in accordance with the Centers for Disease Control and Prevention guidance for Tier 1 Biological Select Agents and Toxins (42 CFR Part 73, 7 CFR Part 331, and 9 CFR Part 121), and in accordance with the Association for Assessment and Accreditation of Laboratory Animal Care (Guide for the Care and Use of Laboratory Animals” 8th Ed., National Research Council, The National Academies Press, Washington DC, 2011).

II. POLICY

It is the policy of NYMC to perform a job-related Pre-Employment Health Clearance through Health Services for job applicants for specific, enumerated roles prior to their employment at NYMC, and for non-NYMC employees prior to their access to a laboratory or to the Department of Comparative Medicine at NYMC. These requirements also pertain to current employees who transfer to such specific enumerated roles. Failure to comply with any of the Health Service requirements of this policy may result in the withdrawal of an offer of employment or immediate termination.

III. SCOPE

This policy applies to all of the following:

1. NYMC employees, and CBU employees on the NYMC payroll, (includes full-time, part-time, international visiting employees, fellows and post-doctoral scholars, and per diem employees whose employment is continuous) who work in the following job categories:
 - a. Any position requiring access to the Department of Comparative Medicine. This includes all security and facilities staff that have regular access to the Department of Comparative Medicine. This does not include administrative positions that do not have any access to or exposure to animals, laboratories, substances, or materials used in the Department of Comparative Medicine.
 - b. Any position involving husbandry.
 - c. Any position working in a Biosafety Level (BSL) 3 laboratory and select positions involving working in a BSL 2 laboratory.
 - d. Any position in which a determination of potential exposure to blood or body fluids is a Category 1 or Category 2 as defined by OSHA.

- e. Any CBU position where the applicable collective bargaining agreement requires health screening and or vaccinations.
 - f. Other positions not covered by the above, where there are practical considerations based on the job duties or proximity to animals, laboratories, substances, or materials that would justify screening and/or vaccinations, as reasonably determined by EEHS, Health Services, and Human Resources and approved by the Chief Human Resources Officer.
2. Non-NYMC employees who work in a NYMC laboratory or in the NYMC Department of Comparative Medicine. This includes visiting students, visiting scientists, contract space licensees and laboratory volunteers.
 3. This policy does not address the Health Service requirements of health professional students and non-health professional students matriculated at the NYMC in the School of Medicine, the NYMC School of Health Science and Practice, the NYMC Graduate School of Basic Medical Sciences or the Touro School of Dental Medicine at NYMC.

IV. DEFINITIONS

1. OSHA Exposure Questionnaire: In accordance with the OSHA Blood Borne Pathogen Standard (OSHA Title 29 of Code of Federal Regulations 29 CFR 1910.1030), persons with potential exposure to blood borne pathogens review the potential for exposure and are offered Hepatitis B vaccination if the person does not have immunity to Hepatitis B virus.
2. EEHS: The Department of Energy, Environmental Health and Safety.
3. CBU – Union represented employees (Collective Bargaining Unit).

V. PROCEDURES

1. List of Covered Roles

- A. A list of current roles at NYMC that are within the scope of this policy, as set forth in Section III., is attached to this Policy as Exhibit A.
- B. Human Resources, in consultation with EEHS and Health Services, will update the list of covered roles from time to time as roles are added or changed. A complete review of Exhibit A will take place at least once a year in July.

2. Pre-Employment:

- A. For NYMC employees in covered roles as defined in the scope of this policy:
 - i. Prior to the start date of employment, or the date of transfer to a new position, Human Resources will provide the employee with the Health Services Packet and schedule an appointment with Health Services. The packet contains a Medical History Questionnaire, the OSHA Exposure Questionnaire, and a cover letter explaining the other requirements. For Requirements see Table 1A.
 - ii. The completed requirements are due before Human Resources can schedule safety training for the employee. Health Services informs Human Resources of an employee's

clearance 1- 3 days after the original appointment, depending upon whether a tuberculin skin test was required at the appointment. Notification is sent electronically from the electronic health record of Health Services.

- iii. Human Resources notifies Health Services when the prospective employee has been assigned a Touro number. This is required to allow the health records of the prospective employee to be merged electronically in the electronic medical record of Health Services.

B. For Non NYMC Employees working in a Laboratory or in the Department of Comparative Medicine:

- i. The Department Administrator provides the prospective non-employee subject to this policy with a Laboratory Volunteer packet that includes the Health Service Requirements (see Table 1B) for access to a laboratory or to the Department of Comparative Medicine.
- ii. The completed requirements are due before Human Resources can schedule safety training. Health Services informs Human Resources of the health clearance 1- 3 days after the documents are received. Notification is sent electronically from the electronic health record of Health Services to Human Resources and the Department Administrator.

C. Employees/Non-employees arriving from countries outside the United States must have all health documents in English. Documents that have been translated into English must be signed by a licensed health care provider.

3. Enrollment in the Occupational Health Program and Annual Surveillance:

- A. Select NYMC employees and select non-NYMC employees subject to this policy are required to enroll in an Occupational Health Program because, due to the specific nature of their role or activities, they require additional vaccinations or screening tests, and will require annual health surveillance, in accordance with Centers for Disease Control and Prevention guidance for Tier 1 Biological Select Agents and Toxins (42 CFR Part 73, 7 CFR Part 331, and 9 CFR Part 121), and in accordance with the Association for Assessment and Accreditation of Laboratory Animal Care.
- B. The job categories requiring Occupational Health Program enrollment are:
 - i. Access to Comparative Medicine (includes certain Facilities and Security personnel)
 - ii. Husbandry staff in the Department of Comparative Medicine
 - iii. BSL 3 Laboratory staff.
- C. The requirements for the Occupational Health Program at initiation are detailed in Table 1C. These requirements are completed at the initial health clearance appointment or at enrollment into the Occupational Health program. The annual requirements are detailed in Table 2.
- D. Notification for the requirements for initial enrollment into the Occupational Health Program and for annual surveillance is performed by the EEHS Department, as follows:

- i. A risk assessment for the job duties is reviewed by the individual performing the duties, the Principal Investigator and EEHS at the initiation into the program.
 - ii. EEHS then determines the requirements for the position and informs Health Services of those requirements through the Risk Assessment.
 - iii. Annually the Risk Assessment is reviewed and an attestation to the current risks is completed or a new risk assessment is completed. EEHS determines the requirements for the position and informs Health Services of those requirements through the Attestation that the risks are unchanged or by a new Risk Assessment.
 - iv. All Health questionnaires, and if applicable, laboratory tests or physical exams are reviewed/performed at Health Services and maintained in the health record. Completed questionnaires are sent to Health Services directly from the individual to the electronic health record, or are delivered to Health Services in a sealed envelope.
 - v. Health Services informs EEHS of the initial or annual clearance electronically by a letter generated from the medical record. In the case of annual surveillance, EEHS may access the task list required for annual surveillance that is housed in the electronic health record and can see the completed and incomplete items. Only the task list is visible to EEHS staff.
4. If during any of the health assessments described above, a medical problem is evident that would prohibit the person from meeting job requirements, the employee and Human Resources will be notified by Health Services.
5. Charges:
 - A. Vaccinations, tuberculin skin tests and urine toxicology tests required for the job description of a NYMC employee are provided at no charge.
 - B. Space licensees are charged a fee for medical record review.
6. Clinical Services Provided at Health Services:
 - A. Health Services provides assessment and follow up of occupational injury, and will provide first aid/ assessment to individuals in the event of any injury (occupational or non-occupational). For NYMC employees only, Health Services may provide the initial assessment of acute medical problem that interferes with the person's capacity to work that day. Health Services will not provide ongoing or recurrent medical care to employees, and Health Services does not refill prescriptions from outside providers.

VI. EFFECTIVE DATE:

This policy is effective immediately.

VII. POLICY RESPONSIBILITIES

1. New or transferring employees in roles covered by this policy will comply with all aspects of Pre-Employment Health Assessment outlined in this policy and return the appropriate Checklist(s) to the Human Resources Department or the appropriate Affiliation Administration Office.
2. Human Resources and the Affiliation Administration Office will:
 - A. Ensure that all Checklist(s) are completed and returned by the employee and/or Health Service Department.
 - B. Place document(s) in employee's personnel file.
 - C. Provide advice and guidance with respect to the interpretation and administration of this policy.
 - D. Inform Health Services of a new employee's Touro number.

VIII. POLICY MANAGEMENT

Responsible Executive: Chief Human Resources Officer

Responsible Officers: Director of Health Services, Director of Human Resources

Responsible Offices: Human Resources Department, EEHS, Health Services

EXHIBIT A
List of Covered Roles
As of December 4, 2018

1. LIST OF COVERED POSITIONS FOR HEALTH SERVICES SCREENING:

Please note this would apply to interns, per diems, volunteers, and/ or contractors that may be working in the laboratories or Departments listed below.

A & B Any personnel working in laboratories, including Comparative Medicine

Research Faculty and Chair
Director (Faculty), Associate Director
Research Assistants, Associates, Fellows and Technicians
Security – Director, Associate Director, Security Officers
Supervisor, Supervisor of Vet Services
Animal Caretaker Technologist, Sr. Animal Care Tech, Animal Care Tech C, Animal Caretaker
Vet Tech A, Vet Tech B, Vet Tech Senior
Staff, Administrative Coordinator
Facilities – excludes Grounds & Adm. & Coordinator
**anyone with access to Comp Med including non-NYMC Contractors and/or Volunteers*

C. Other positions not that would justify screening due to possibility of exposure to lab, fluids, animal care or as otherwise determined by EEHS, Health Services, HR

Department of Dental Medicine: Faculty and Clinical Assistant
Speech Language Pathology (SHSP) clinic
Nurses/Nurse Practitioner/Medical Assistant and Licensed Practical Nurse
Health Services Staff-including Secretary III, Administrator, Director
Nurse Research Coordinator
Director of Lab, Lab Manager, Director BioInc
**Including per diem staff*

D. BSL 3 Lab

Research Faculty
Energy Environmental Health and Safety staff, excluding Administrator
Research Associates/Research Technicians

E. CBU positions that require health screening/vaccinations through collective bargaining agreement

Lab Aide, Laboratory Technician and Technologist
Research Data Analyst
Research Tech. A, B, C
Sr. Research Tech
Research Assistant

Table 1A.	
Pre-Employment Requirements: Select NYMC Employees Initial Health Clearance	
Medical History questionnaire	Complete attached questionnaire and review at the Health Services (HS) appointment.
Physical Form	A physical exam, performed within one year prior to start date, is brought to the Health Services appointment. The attached form may be used by your provider. If this cannot be provided, Health Services will perform a focused fitness for duty exam.
OSHA Blood Borne Pathogen Category Exposure and Hepatitis B virus (HBV) Vaccine Acknowledgment	The completed form is brought to the HS appointment. If you have previously received HBV vaccination, please bring records of vaccination or, if available, laboratory evidence of serologic immunity. Persons eligible for HBV vaccine will be offered HBV vaccine at no charge
Tetanus vaccination	Proof of Tetanus toxoid (Td) or Tetanus diphtheria acellular pertussis (TdAP) within 10 years – If vaccination is overdue, it will be provided by Health Services at no charge
Tuberculosis (TB) Screening	Within 1 year prior to start date, provide documentation of a tuberculin skin test (TST) or an interferon gamma release assay test for TB. If positive, a chest x-ray report after the documented positive test is required. If a TB screening test is not available, a TST will be performed at the Health Service appointment.
Immunity to Measles, Mumps, Rubella (MMR) and Varicella	For employees that serve as clinical faculty with patient care responsibilities: proof of MMR immunity is required by NYSDOH law, and immunity to varicella is strongly recommended. ¹
Table 1B. Requirements for Non-NYMC Employees Working in Laboratories or in the Department of Comparative Medicine	
HBV vaccination	Proof of vaccination or a signed declination
Tetanus vaccination	Proof of vaccination or a signed declination
TB screening	TST within one year; if positive chest x-ray report. Only required for persons arriving from outside the United States
Table 1C. Occupational Health Program Requirements for Select Personnel indicated below <i>(performed at initial Health Clearance or subsequent to initial clearance)</i>	
Risk Assessment	All persons in the Occupational Health Program
Exposure Assessment	All persons in the Occupational Health Program
Allergy Questionnaire	Household staff and persons with Comparative Medicine access.
N95 Respirator Fit Testing	BSL-3 lab personnel, Comparative Medicine personnel working regularly with animals, select BSL-2 lab staff, select Facilities and Security staff
Influenza vaccine	BSL-3 personnel and all personnel working with influenza
Toxicology Screen	BSL-3 lab personnel working with CDC classified Tier 1 agents
Tier 1 Assessment	BSL-3 lab personnel working with CDC classified Tier 1 agents
Rabies Immunity	For Comparative Medicine personnel if animals in use pose a risk
Zika Training	For Laboratory Staff working directly with the Zika virus
Meningococcal Vaccine	Recommended for any laboratory personnel work with <i>N. meningitidis</i> .

¹NYSDOH, Recommendations for vaccination of healthcare personnel. September 2016

Table 2. Annual Surveillance Requirements for Personnel in the Occupational Health Program	
Attestation	All persons in the Occupational Health Program
Follow-Up Medical Questionnaire	All persons in the Occupational Health Program.
HBV and Tetanus Vaccination Review	All persons in the Occupational Health Program
Physical Exam	Only BSL-3 Laboratory personnel and Husbandry staff
Influenza vaccination	All lab personnel working with influenza and BSL3 personnel
N95 Respirator Fit Testing	BSL-3, select BSL-2 , Husbandry staff, select Facilities and Security staff
Psychological Screen	BSL 3 staff working with Tier 1 agents as defined by the Centers for Disease Control and Prevention
TB screening	Only for Husbandry staff if Comparative Medicine is housing primates