

Algoma Public Health – EMPLOYEES – Policies and Procedures Manual

APPROVED BY: Medical Officer of Health

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SECTION: Human Resources – Health and Safety

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SUBJECT: COVID-19 Immunization Policy

PURPOSE:

Algoma Public Health (APH) is committed to maintaining a safe and healthy workplace and recognizes the importance of COVID-19 vaccination of employees, contractors, students and volunteers. This policy outlines APH's expectations with regards to COVID-19 immunization including tracking vaccination, documentation for medical contraindication, education for those declining, and antigen testing for those not fully vaccinated.

Contingent upon vaccine availability, all eligible employees, contractors, students and volunteers are strongly encouraged to receive a COVID-19 vaccine, unless it is medically contraindicated.

BACKGROUND:

On March 11, 2020, the World Health Organization declared COVID-19 a pandemic virus. Globally, within Ontario and in the Algoma District, variants of the virus have circulated, including the current dominance of the Delta variant with increased transmissibility and disease severity compared with previous COVID-19 virus strains.

COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). It may be characterized by fever, cough, shortness of breath, and several other symptoms. Asymptomatic infection is also possible. The risk of severe disease increases with age but is not limited to the elderly and is elevated in those with underlying medical conditions.

APH recognizes the importance of immunization of employees, contractors, students and volunteers, due to the nature of their work and the potential for exposure in the community. Vaccination against COVID-19 helps reduce the number of new cases and severe outcomes, including hospitalizations and death due to COVID-19.

SCOPE:

Regardless of how often and how much time they spend at APH or in their respective workplace, this policy applies to:

- Employees (in office and working from home)
- Contractors (including people employed by a third party)
- Students on an educational placement
- Volunteers

POLICY STATEMENT:

This policy:

- Meets the requirements of the instructions issued by the Chief Medical Officer of Health on August 30, 2021, to transfer payment recipients funded by the Ministry of Children, Community and Social Services (MCCSS) that provides and delivers Healthy Child Development (HCD) and Early Intervention programs.

- Is aligned with the Employer's general duty under *the Occupational Health and Safety Act* to take reasonable precaution to protect its workers (broadly defined) and the need therefore to assess the workplace for risks of COVID-19 transmission.
- Is applied in accordance with the *Ontario Human Rights Code, Occupational Health and Safety Act* and any other applicable legislation.

COVID-19 immunization is the most effective way of preventing the spread of COVID-19. APH strongly recommends and encourages all employees, contractors, students and volunteers to receive the COVID-19 vaccination, unless it is medically contraindicated.

A. EMPLOYEES

1. All employees will be required to provide **one** of the following:

- a) Proof of full vaccination against COVID-19. For the purposes of this policy, "fully vaccinated" means:
- The full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines, or
 - One or two doses of a COVID-19 vaccine not authorized by Health Canada, followed by one dose of a COVID-19 mRNA vaccine authorized by Health Canada, or
 - Three doses of a COVID-19 vaccine not authorized by Health Canada; and
 - You received your final dose of the COVID-19 vaccine at least 14 days ago.

Employees who are not fully immunized must follow the COVID-19 antigen testing procedures as indicated below until they can provide proof of full vaccination against COVID-19.

- b) Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
- i) That the person cannot be vaccinated against COVID-19; **and**
 - ii) The effective time period for the medical reason (i.e., permanent, or time-limited).

Medical reasons must align with contraindications listed by the National Advisory Committee on Immunization (NACI). [See NACI contraindications and precautions](#). Contraindications that do not align with NACI recommendations will not be accepted. See [Ministry of Health's guidance document on medical exemptions](#).

When 1 b) above applies and the time period is time-limited, Human Resources (HR) will be in contact with the employee to discuss next steps.

- c) Written proof that the individual has completed an educational program approved by APH that must include at a minimum:
- How COVID-19 vaccines work;
 - Vaccine safety related to the development of the COVID-19 vaccines;
 - Risk of not being vaccinated against COVID-19;
 - Benefits of vaccination against COVID-19; and
 - Possible side effects of COVID-19 vaccines.

When 1c) applies, an employee is to contact HR if they decide to become fully vaccinated after completion of the approved educational program.

Employees are to complete the applicable form in the HR forms section on the stAPH portal and upload the receipts provided by the Ministry of Health, their medical certificate, and/or proof of completion of an

educational program **by October 4, 2021** or on first day of work when returning from leave of absence. The employee will be considered **not immunized** and will be required to submit to regular COVID-19 antigen testing for non-completion of the applicable section and upload of required documentation by the deadline.

Employees who are not fully vaccinated will be required to submit to regular COVID-19 antigen testing.

Employees who rely on 1b) or 1c) above, may be subject to additional requirements such as redeployment, personal and public health protective measures, work exclusion/leave of absence etc. based on the assessment by the Medical Officer of Health/CEO or designate of factors including for example, the work/role of the individual, the type of workplace, etc. and in consideration of the duty to accommodate, as applicable.

COVID-19 Antigen Testing

Employees who elect not to provide proof of COVID-19 vaccination per 1a) above and rely on 1b) or 1c) are required to perform regular antigen point of care testing for COVID-19:

- Self-tests will be available for pick up in HR in SSM office, and will be sent to district offices for affected staff. When there are 5 tests left in the provided kit, the employees shall notify HR;
- The self-test must be completed 24 hours prior to work; this includes working from home and in the community (e.g. home visits, inspections, enforcement activities, etc.) For employees who are scheduled to work five (5) consecutive days, three (3) tests will be required on alternating days, within those five days. Employees who are scheduled to work less than five (5) consecutive days, two (2) tests will be required within a seven (7) day period;
- For each self-test, employees must complete the COVID-19 Antigen Testing Results form found in the HR form section on the stAPH portal. Ensure a date-stamped photo of each test is uploaded with the form. Employees are required to keep a date-stamped picture of tests for a minimum of three weeks. If requested, employees will be required to submit a retroactive record of their tests. Employees also will have to attest that they have completed a rapid test with a negative result in the last 24 hours, or other such reporting as they are directed to complete. Required documentation is to be completed in the stAPH portal;
- Employees who test positive on the rapid test must notify HR and seek Polymerase Chain Reaction (PCR) testing at an assessment centre within 24 hours of a positive test or self-isolate for 10 days if testing is refused. Public health guidelines for self-isolation shall be followed;
- If symptomatic, the employee shall not complete a home rapid testing and shall seek PCR testing at an assessment centre within 24 hours;
- Test kits provided by APH are for the exclusive use of the employee and are to be used only for routine asymptomatic screening under this procedure.

B. NEW HIRES, STUDENTS AND VOLUNTEERS

Full vaccination for COVID-19 is required for all new hires, students and volunteers, unless medically contraindicated.

If proof of vaccination or medical certificate as per 1b) above is not received prior to the start date, the new hires' offer of employment may be rescinded.

HR will be responsible for orienting schools and volunteers to this policy.

Students and volunteers must be fully vaccinated for COVID-19, unless medically contraindicated, before starting placement/volunteer assignments at APH. Volunteers must provide proof of vaccination or medical certificate as per 1b) above to HR.

The schools will be responsible for managing, tracking, reporting compliance with this policy. In the event of an exposure to COVID-19 proof of vaccination status of individuals must be provided to HR.

C. CONTRACTORS

Full vaccination for COVID-19 is required for all contractors, unless medically contraindicated. The Manager of Operations will be responsible for ensuring contractors adhere to this policy and will forward to HR, contractors' copies of receipts provided by the Ministry of Health as proof of COVID-19 vaccination, their medical certificate, or proof of testing results. Contractors who work at an APH office must complete 1a) or 1b) above before starting at APH.

COMPLIANCE:

Failure to follow this policy may be subject to disciplinary action up to and including termination of employment, contract or placement.

All employees, contractors, students and volunteers are required to continue to comply with applicable COVID-19 health and safety measures as outlined in the APH COVID-19 safety plan regardless of their vaccination status.

CONFIDENTIALITY:

Forms and documents uploaded on the stAPH portal, as well as forms and documents received from contractors, schools and volunteers will be accessed by HR to ensure:

- That data is available on immunization rates, medical reasons for not being vaccinated and participation in educational programs to assist with decision making on service resumption/discontinuation; case, contact and outbreak management; and infection prevention and control practices as applicable; and
- Validating compliance with this policy.

Information collected under this policy is in compliance with relevant legislation including but not limited to the *Personal Health Information Protection Act* and the *Ontario Human Rights Code*.

KNOWLEDGE:

Definitions:

Full vaccination:

https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19_fully_vaccinated_status_ontario.pdf

Medical exemptions:

https://health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/medical_exemptions_to_vaccination.pdf

Proof of vaccination: The only accepted proof of COVID-19 vaccination is the receipt provided by the Ministry of Health (MOH). For people with a green photo OHIP card, a PDF receipt of COVID-19 vaccination is available [online](#). For those with the red and white health card, people can call the Provincial Vaccine Booking Line at 1-833-943-3900 for a receipt. Ontarians who received their first or second dose of the COVID-19 vaccine out of province should [contact their local public health unit](#) to record their information and receive proper documentation.

Contractor: a person or company that undertakes a contract with APH to provide materials or labour to perform a service or to do a job. For the purpose of this policy, contractors include those who:

- Attend inside any APH office or location of service e.g. off-site immunization clinics led by APH
- Attend on property outside and have contact (<6 feet) with an APH employee or client.

RESOURCES:

[Occupational Health & Safety Act](#)

[COVID-19 in Ontario](#)

[Educational Program approved by APH](#)

[Medical Exemption for COVID-19 form](#)



CMOH Instructions -
MCCSS Non-CTC Stak