

**COVID-19 Vaccination**

Approval: RVH Board of Directors

Approval Date: 30-AUG-2021

Effective Date: 31-AUG-2021

**SCOPE:**

This policy and procedure applies to all employees of the Royal Victoria Regional Health Centre (RVH) as well as credentialed staff with RVH privileges (i.e., medical, dental, midwifery and extended class nurses), volunteers, students, and contractors. These individuals shall be referred to collectively as Workers herein. The requirements apply whether working on RVH property or working on behalf of or representing RVH elsewhere, including working remotely. This policy also applies to any business operating on RVH property.

**POLICY STATEMENT:**

At RVH Safety is Our Promise. RVH recognizes the importance of vaccination of Workers. As a healthcare organization Team RVH has a responsibility to take every reasonable measure to keep our patients – and those who care for them – safe due to the nature of RVH’s work with vulnerable patients and seniors and the potential for exposure in the community. We know COVID-19 vaccine is an effective way to protect and contain the spread of this highly transmissible virus. This COVID-19 Vaccination policy protects RVH’s population including patients and Workers. RVH will assist a Worker in booking a vaccination appointment if requested.

Contingent upon vaccine availability, all employees, credentialed staff and volunteers are required to be fully vaccinated against COVID-19, subject to the duty to accommodate under the Ontario Human Rights Code. This policy seeks to achieve 100% vaccination for all.

Effective September 7, 2021 RVH is required to implement a COVID-19 Vaccination Policy as required by the Ontario Chief Medical Officer of Health’s Directive #6 for Public Hospitals (Appendix I) which outlines a minimum standard. RVH, consistent with the approach adopted and endorsed by the majority of Hospitals in the Central Region of Ontario Health is implementing an enhanced policy that exceeds the minimum standards of Directive #6. This enhanced approach is also supported by the Registered Nurses Association of Ontario and the Ontario Medical Association. This policy outlines the organizational expectations with regards to COVID-19 vaccination of Workers. Contingent upon vaccine availability, all eligible employees, credentialed staff, volunteers are required to be fully vaccinated against COVID-19, unless provided with an accommodation under the Ontario Human Rights Code, in order to:

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1. Protect all patients (including high-risk patients), those who receive direct services from Workers; all Workers; and the broader community, including family members
2. Protect the ability of RVH to provide services
3. Combat and respond to the prevalence of variants of COVID-19 (including Delta) and the anticipated impact of waves of COVID-19 (including Wave 4)
4. Provide leadership on this preventative measure to the community and our community partners by taking all reasonable measures in the circumstances to provide a safe environment

It is the position of the [National Advisory Committee on Immunization \(NACI\)](#) that:

- Those most likely to transmit COVID-19 to those at high risk of severe illness and death from COVID-19 and workers essential to maintaining the COVID-19 response, including healthcare workers, receive the COVID-19 vaccine
- The authorized COVID-19 vaccines that are recommended for use by NACI have been shown to be safe, as well as efficacious against symptomatic laboratory-confirmed COVID-19 disease.
- Everyone living in Canada take the vaccine (including booster shots as directed)

### **DEFINITIONS:**

**COVID-19:** COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus. It can be characterized by fever, cough, shortness of breath, loss of taste, loss of smell and a number of other symptoms. For a full list of symptoms please review the public health guidance [here](#). Asymptomatic infection is also possible. COVID-19 is primarily transmitted person-to-person through respiratory droplets. The risk of severe disease increases with age and is elevated in those with underlying medical conditions.

**Full Vaccination:** Individuals will be deemed to have been fully vaccinated if they have received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization (e.g. two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and 14 days have elapsed from the final dose.

**Medical Exemption:** A medical exemption as defined by Directive #6 allows Workers to not be required to complete the mandatory education module if they are not fully vaccinated.

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**Ontario Human Rights Code:** The Ontario Human Rights Code establishes protected grounds that must be accommodated up to the point of undue hardship. These grounds include disability, creed, sex (pregnancy).

**Antigen Testing:** Antigen based tests detect specific proteins on the surface of the virus. There are often called rapid tests, as they typically provide results in less than an hour.

**Contractor:** Any individual regardless of the frequency of attendance on Hospital property who is paid for their services.

**Volunteer:** Any individual regardless of the frequency of attendance on Hospital property who volunteers their time or services to the Hospital.

**Business Operating on Hospital Property:** This includes any business that is operating on Health Centre property.

## PROCEDURE

### Section A – Employees, Credentialed Staff and Volunteers

**Declaration Process:** By September 1, 2021 all employees, credentialed staff and volunteers are required to complete the Declaration of Vaccine Status form.

- For employees this form is completed in the Human Resources Information System, *PeopleSoft*. Employees who are not active will be required to comply with this Policy in full on their return to work.
- For credentialed staff this form is available from Medical Affairs and needs to be completed and sent to Occupational Health and Wellness.
- For volunteers this form is available from the Volunteer Resources Office and needs to be completed and sent to Occupational Health and Wellness.

Failure to submit the Declaration of Vaccine Status Form will result in the individual being deemed to be unvaccinated.

**Effective September 7, 2021 the following will occur for all employees, credentialed staff, and volunteers:**

**Option 1** is that the individual will be fully vaccinated. An individual is fully vaccinated if they have provided proof of a complete series of a World Health Organization COVID-

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19 Vaccine on file in Occupational Health and 14 days have elapsed from the final dose. Nothing further will be required under this policy.

**Option 2** is that the individual will be considered unvaccinated. If unvaccinated the individual will be required to complete mandatory antigen testing. The process for testing is outlined below. Failing to complete testing will result in discipline up to and including termination.

Individuals in Option 2 will fall into one of three categories:

- a. Individuals who intend to become fully vaccinated. Once fully vaccinated these individuals must provide proof to Occupational Health. Without proof provided the individual will be considered unvaccinated.
- b. Individuals who do not intend to become fully vaccinated and are working with RVH to review if an accommodation can be provided under the Ontario Human Rights Code. The individual must submit a request to Occupational Health or Human Resources to request an accommodation. The request will be reviewed and assessed as required by the Ontario Human Rights Code.
- c. Individuals who are declining the vaccine for reasons unrelated to the Ontario Human Rights Code.

All individuals who are not fully vaccinated and who do not provide medical documentation that meets the requirement of a medical exemption under Directive #6 will be required to complete the educational program approved by RVH and available in the LMS. This must be completed no later than October 15, 2021. Time spent completing this education will be unpaid. Failure to complete the education will result in discipline up to and including termination.

Effective October 8, 2021 employees, credentialed staff and volunteers who have not received a full series of a COVID-19 vaccine or who are not being provided with an accommodation under the Ontario Human Rights Code (including medical exemption) will be placed on an unpaid leave of absence or, for credentialed staff, have their privileges restricted or suspended in accordance with applicable bylaws for a duration of time that does not result in the leave of absence or privilege change extending beyond October 31, 2021. Testing will continue to be offered for those, if any, who are provided an accommodation.

Effective, no later than October 31, 2021 employees, credentialed staff and volunteers who have not received a full series of a COVID-19 vaccine or who are not being provided with an accommodation under the Ontario Human Rights Code (including medical exemption) will be terminated for cause and without any payment or have their privileges restricted, suspended or terminated in accordance with applicable bylaws, or

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have their volunteer placement ended. Testing will continue to be offered for those, if any, who are provided an accommodation.

**Section B – Students, Contractors**

Prior to September 7, 2021 RVH will contact all educational institutions that RVH hosts students from and all contractors that currently have individuals on site. RVH will advise the educational institutions and contractors of the COVID-19 Vaccination Policy.

All students and contractors will be required to be fully vaccinated. The Educational Institution and the Contractor will collect proof of vaccination and retain on file in the event it is requested by RVH. The Educational Institution and the Contractor will complete the attestation form (Appendix II) confirming that the individuals they send to RVH are fully vaccinated. All new contractors will include a reference to this policy and a requirement to complete this attestation.

A medical exemption may be sought as outlined by Directive #6; however, testing will need to be arranged and discussed prior to the individual attending on Hospital property.

**Section C- Businesses Operating on RVH Property**

Prior to September 7, 2021 RVH will contact all businesses that operate on RVH Property. RVH will advise the businesses operating on RVH Property of the COVID-19 Vaccination Policy.

All businesses that operate on RVH Property will need to confirm that they are in compliance with Directive #6. The businesses will complete the attestation form (Appendix III) confirming that they are in compliance with Directive #6.

**Section D – COVID-19 Testing**

All employees, credentialed staff, volunteers who are deemed not to be fully vaccinated (i.e. are Option 2 of Section A) will be required to undergo antigen point of care testing for COVID-19 and demonstrate a negative result two times a week beginning the week of September 6, 2021. The process for testing is outlined in Appendix IV.

This process must be repeated every week until the individual provides proof of full vaccination.

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Failure to complete any weekly test or report the result will result in discipline up to and including termination.

There will be no compensation provided to the individual for the time required to complete this regular testing. The individual can determine when and where to self-administer the testing at their discretion provided it meets the weekly requirements.

The weekly requirement does not apply if an individual is on an approved leave of absence (vacation, sick leave, IDEL, and if your employment contract never requires you to work on RVH premises).

If the weekly test is positive, follow OHW Absence Scenario number 1.

**Section E – New Hires**

All employees, credentialed staff and volunteers hired by RVH with a start date of November 1, 2021 or later, will be required as a condition of employment and privileges to provide proof of full vaccination or request and receive an accommodation under the Ontario Human Rights Code (including a medical exemption). Failure to do so will result in the rescindment of the offer of employment and termination for cause or rescinding of offer of privileges.

**Section F - Confidentiality Statement & Privacy**

RVH is required, pursuant to the Chief Medical Officer of Health's (OCMOH) Directive #6 for Public Hospitals within the meaning of the Public Hospitals Act, 1990, and the Local Health Integration Networks within the meaning of the Local Health System Integration Act, 2006 to report statistical information to the OCMOH or the ministry. No identifying information will be provided to the ministry in relation to this policy; all statistical information will be provided in aggregate form.

The individual's vaccination status will not be disclosed outside of Occupational Health and Wellness up until October 8, 2021. At that time if the individual is not fully vaccinated, Human Resources will be advised to process an unpaid leave of absence.

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**APPENDICES:**

Directive #6 for Public Hospitals. Issued by the Ontario Chief Medical Officer of Health pursuant to s. 77.7 of the *Health Protection and Promotion Act* (HPPA), R.S.O. 1990, c. H.7.

Attestation form for Educational Institutions and Contractors

Attestation form for Businesses Conducting Business on RVH Property

**CROSS REFERENCES:**

Royal Victoria Regional Health Centre (2021). Policy and Procedure: *Influenza*

Royal Victoria Regional Health Centre (2019). Policy and Procedure: *Routine Practice in Infection Prevention and Control*

Royal Victoria Regional Health Centre (2018). Policy and Procedure. *Additional Precautions in Infection Prevention and Control*

Royal Victoria Regional Health Centre (2019). Policy and Procedure: *Infection Prevention and Control Outbreak Management*

Royal Victoria Regional Health Centre Occupational Health & Wellness Absence Scenarios

**REFERENCES:**

Ministry of Health (MOH). Case and Contact Management Resources. Retrieved 2021-06-07 from [https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/2019\\_guidance.aspx](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/2019_guidance.aspx)

National Advisory Committee on Immunization (NACI). COVID-19. Retrieved 2021-06-07 from <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci.html>

Simcoe Muskoka District Health Unit (SMDHU). COVID-19. Retrieved 2021-06-07 from <https://www.simcoemuskokahealth.org/Topics/COVID-19>

[Ontario Human Rights Code](#)

[Occupational Health and Safety Act](#)

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**Appendix I – Directive #6**

[https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination\\_policy\\_in\\_health\\_settings.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination_policy_in_health_settings.pdf)



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**Appendix II – Attestation for Students and Contractors**

**RVH Attestation for Educational Institutions and Contractors**

Effective September 7, 2021 RVH must comply with Directive #6 from the Chief Medical Officer of Health of Ontario. Under this Directive RVH must ensure that all students and contractors who attend on hospital property comply with Directive #6.

RVH has implemented a COVID-19 Vaccination Policy. Under this policy all educational institutions and contractors must complete this attestation on behalf of their students/employees/staff verifying that all individuals attending on RVH property are either fully vaccinated or have been granted a medical exemption and are completing testing.

This form must be completed on a monthly basis and submitted to [insert contact]. RVH will retain this attestation to demonstrate compliance with Directive #6.

**TO BE COMPLETED BY PERSON WITH AUTHORITY TO BIND THE EDUCATIONAL INSTITUTION OR CONTRACTOR FOR SUBMISSION TO RVH:**

I confirm that all individuals from \_\_\_\_\_ (insert name of educational institutional or contractor) are either fully vaccinated or have provided proof of a medical exemption and have completed anti-gen testing at least once a week, for weeks that they are on site at RVH.

I confirm that \_\_\_\_\_ (insert number of individuals) are fully vaccinated and that documented proof of full vaccination is on file. I agree that proof of vaccination will be provided to RVH if required by the Ministry of Health or by law.

I confirm that \_\_\_\_\_ (insert number of individuals) have been granted a medical exemption in accordance with Directive #6. I confirm that these individuals will complete weekly anti-gen testing for all weeks that they are on site at RVH. I agree that proof of the medical exemption and proof of testing will be provided to RVH if required by the Ministry of Health or by law.

I acknowledge that I have reviewed Directive #6 and RVH's COVID-19 Vaccination Policy and understand the requirements. I acknowledge that failure to provide accurate information, updated information as necessary or to complete this attestation may result in the cancellation of educational placements and/or contracts.

By signing this form I confirm the validity of the statements above and agree to retaining the necessary records

\_\_\_\_\_  
[Name, Title, Educational Institution or Contractor]

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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**Appendix III – Attestation for Businesses Operating on RVH Property**

**RVH Attestation for Businesses Operating on RVH Property**

Effective September 7, 2021 RVH must comply with Directive #6 from the Chief Medical Officer of Health of Ontario. Under this Directive RVH must ensure that all businesses that operate on RVH Property comply with Directive #6.

RVH has implemented a COVID-19 Vaccination Policy. Under this policy all businesses that operate on RVH property must complete this attestation on behalf of their employees/staff verifying that all individuals attending on RVH property are in compliance with Directive #6.

This form must be completed on a monthly basis and submitted to [insert contact]. RVH will retain this attestation to demonstrate compliance with Directive #6.

**TO BE COMPLETED BY PERSON WITH AUTHORITY TO BIND THE BUSINESS OPERATING ON rvh PROPERTY FOR SUBMISSION TO RVH:**

I confirm that all individuals from \_\_\_\_\_ (insert name of business operating on RVH property) are either fully vaccinated OR have provided proof of a medical exemption OR have otherwise declined the vaccine but have completed the required educational course AND have completed antigen testing at least once a week, for weeks that they are on site at RVH.

I confirm that \_\_\_\_\_ (insert number of individuals) are fully vaccinated and that documented proof of full vaccination is on file. I agree that proof of vaccination will be provided to RVH if required by the Ministry of Health or by law.

I confirm that \_\_\_\_\_ (insert number of individuals) have been granted a medical exemption in accordance with Directive #6. I confirm that these individuals will complete weekly antigen testing for all weeks that they are on site at RVH. I agree that proof of the medical exemption and proof of testing will be provided to RVH if required by the Ministry of Health or by law.

I confirm that \_\_\_\_\_ (insert number of individuals) have declined the vaccine after completing the mandatory education required by Directive #6. I confirm that these individuals will complete weekly antigen testing for all weeks that they are on site at RVH. I agree that proof of the declination, completion of the education module and proof of testing will be provided to RVH if required by the Ministry of Health or by law.

I acknowledge that I have reviewed Directive #6 and RVH's COVID-19 Vaccination Policy and understand the requirements. I acknowledge that failure to provide accurate information, updated information as necessary or to complete this attestation may result in the cancellation of educational placements and/or contracts.

By signing this form I confirm the validity of the statements above and agree to retaining the necessary records

\_\_\_\_\_  
[Name, Title, Business Operating on RVH Property]

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

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**Appendix IV – Process for Testing**

The process for testing is available [here](#).