



# Manitoulin Health Centre

<b>Document Name: Policy - COVID-19 Vaccination Surveillance Program</b>		
<b>Dept:</b> Human Resources	<b>Section:</b> Employee Health Services	<b>Subsection:</b>
<b>Last Revision Date:</b> November 2, 2021	<b>Document ID:</b> HR-EHS-21-01	

## STATEMENT OF PURPOSE

Manitoulin Health Centre (MHC) is committed to health and safety and recognizes the importance of COVID-19 vaccination of Health Care Workers (HCWs). The purpose of this policy is to outline the expectations related to mandatory COVID-19 immunization, including tracking vaccination, documentation for medical contraindication, and testing for those who are not fully vaccinated on or before the required date.

This policy applies to all existing staff (on site and working from home), credentialed medical staff, contractors as well as new staff, volunteers (including members of the Board and its committees), students, medical learners, locums, and newly credentialed medical staff.

## STATEMENT OF POLICY

The COVID-19 Vaccination Surveillance Program meets and exceeds the requirements of Regulation 965 Hospital Management under the Public Hospitals Act and Directive #6 issued Aug 17<sup>th</sup>, 2021 by the Chief Medical Officer of Health.

Vaccination against COVID-19 is mandatory for the following reasons:

1. To achieve high rates of COVID-19 vaccination in order to:
  - o Protect patients (many of whom are at high risk for serious health effects related to COVID-19 illness) who interact with and receive services from workers and volunteers;
  - o Protect HCWs;
  - o Protect colleagues and family including those who may be at high risk for serious health effects related to COVID-19 illness;
  - o Minimize the risk of COVID-19 transmission and outbreaks in our facilities, and protect the ability of the organization to provide and maintain the services we deliver to patients.
2. To minimize risk and to assist with decision making on resumption of services and discontinuation of certain infection prevention and control practices and Personal Protective Equipment (PPE), in line with any updates to provincial requirements.

## PROCEDURE

### Method

1. It is mandatory that all HCWs receive the COVID-19 vaccine, unless it is medically contraindicated.
2. Proof of full vaccination and documentation for medical contraindications are to be provided to the Occupational Health & Safety Department (OHSD) Department (vaccinations@mhc.on.ca). Without written documentation, individuals are considered **not immunized**. OHSD will record personal health information collected in the OHSD confidential health record database. Individuals who believe they may have a medical exemption to receiving a COVID 19 vaccine are to call OHSD at extension 2509 for further information.
3. In Ontario, the only accepted proof of COVID-19 vaccination is the receipt provided by the Ministry of

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Health (MOH). For those vaccinated outside Ontario, acceptable proof is based on the criteria provided by the province/state in which they received their vaccine. Only vaccines approved by the National Advisory Committee on Immunization (NACI) will be accepted. Proof shall include name, date of birth, date of vaccination, vaccine name, lot number, and name of the health care practitioner administering the vaccine. A copy of an individual's Ontario COVID-19 vaccine receipts can be obtained at <https://covid19.ontariohealth.ca>

4. All existing staff and existing credentialed medical staff, Board and Board committee members, excluding those with a documented medical exemption accepted by MHC's Occupational Health and Safety Department, are required to meet the following expectations and timelines:
  - **November 12, 2021:** Provide evidence of **first dose of COVID-19 vaccination** to OHSD.
  - **December 7, 2021:** Provide evidence of **two doses of COVID-19 vaccination** to OHSD

In addition:

- Employees and credentialed professional staff on an approved leave of absence (e.g., short or long-term disability, statutory leave) whose confirmed return to work date is on or before November 12, 2021, excluding employees with a documented medical exemption accepted by MHC's Occupational Health and Safety Department, are expected to comply with the expectations and timelines noted above.
  - Employees and credentialed professional staff whose return-to-work date is after November 12, 2021, must provide evidence of two doses of COVID-19 vaccination, excluding employees with a documented medical exemption accepted by MHC's Occupational Health and Safety Department, in order to be cleared by MHC's Occupational Health and Safety Department for return to work.
  - Employees who submitted medical exemptions to MHC's Occupational Health and Safety Department before October 29th, 2021, will be required to get reassessed by their primary care provider in line with the Ministry of Health's updated guidance for medical exemptions and either submit an updated documented medical exemption that is accepted by MHC's Occupational Health and Safety Department, or provide evidence of first dose of COVID-19 vaccination **by November 26, 2021**. Failing to do so will result in leave without pay and potential termination, with the expectations and timelines specific to each employee case communicated to them in writing.
5. Individuals who are not fully vaccinated and are in compliance with this policy, will be required by OHSD to initiate regular COVID-19 antigen testing until two weeks after their second dose of the vaccine.
  6. Consequences for failure to comply with the COVID-19 Vaccine Surveillance Program include:
    - **November 12, 2021: Leave without pay** for employees/**suspension** for credentialed professional staff who have not provided evidence of **first dose of COVID-19 vaccination**, excluding those with a documented medical exemption accepted by MHC's Occupational Health and Safety Department.

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- **November 26, 2021: Termination** for employees/**revocation** for credentialed professional staff who have not provided evidence of **first dose of COVID-19 vaccination**, excluding those with a documented medical exemption accepted by MHC's Occupational Health and Safety Department.
  - **December 7, 2021: Leave without pay** for employees/**suspension** for credentialed professional staff who have not provided evidence of **two doses of COVID-19 vaccination**, excluding those with a documented medical exemption accepted by MHC's Occupational Health and Safety Department.
  - **December 21, 2021: Termination** for employees/**revocation** for credentialed professional staff who have not provided evidence of **two doses of COVID-19 vaccination**, excluding those with a documented medical exemption accepted by MHC's Occupational Health and Safety Department.
7. Departments overseeing contractors and tenants will be responsible for ensuring adherence to this policy. The businesses/organizations will be responsible for managing, tracking, and reporting compliance to MHC. Contractors who work at an MHC site must complete the policy requirements before starting at MHC. In the event of an exposure to COVID-19, proof of vaccination status of individuals must be provided to OHSD.
8. Full vaccination for COVID-19 is required for all new hires, students, medical learners, locums, new credentialed medical staff, and all volunteers as of September 27<sup>th</sup>, 2021. Exceptions may be made for individuals who are unable to receive a COVID-19 vaccine for legislative protected reasons (e.g., medical exemption).
- a) Northern Ontario School of Medicine Site Administrative Coordinator will be responsible for orientating NOSM to this policy. Schools and students will be responsible for managing, tracking and reporting compliance through the CEO & Board of Directors Administrative Assistant. Individuals must be fully vaccinated for COVID-19 before starting at MHC. In the event of an exposure to COVID-19 the schools must be able to provide the OHSD with proof of vaccination status.
  - b) The CEO and Board of Directors Administrative Assistant will be responsible for obtaining and documenting proof of full vaccination for all new credentialed medical staff, locums and Board members. Individuals must be fully vaccinated for COVID-19 before starting at MHC.

## DEFINITIONS

1. COVID-19: An acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus. It is capable of producing severe symptoms and in some cases death, especially in older people and those with underlying health conditions. It is characterized by fever, cough, shortness of breath and a number of other symptoms.
2. Full Vaccination: Having received ALL required doses of a Health Canada-approved COVID-19 vaccine and where 14 days have elapsed following the final vaccine dose. Individuals identified in #6 above, will be allowed to start work or placement at MHC immediately following the second dose. They will not be required to wait the 14 days.

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3. Health Care Worker (HCW): Any person, paid or unpaid, who provides services, works, volunteers or trains in the hospital. This includes MHC employees (paid), physicians, medical learners, students, volunteers, and contract workers at all MHC workplaces.
4. Medical Contraindication: Workers who have a medical reason preventing them from receiving the COVID-19 vaccine that is consistent with the Ministry of Health's latest guidance and accepted by HSN's Occupational Health and Safety Service.
5. Vaccination: The act of introducing a vaccine into the body to produce immunity to a specific disease. Vaccination is a simple, safe, and effective way of protecting people against harmful diseases before they come into contact with them. It uses your body's natural defenses to build resistance to specific infections and makes your immune system stronger.
6. Contractor: A person or company that undertakes a contract with MHC to provide materials or labour to perform a service or do a job. For the purpose of this directive, in scope Contractors include those who:
  - o attend inside an HSN property (exclude those who do not attend on site)
  - o attend on property outside and have contact (< 6 feet) with an MHC employee or patient.
7. Tenant: A person or company that undertakes a lease to occupy space within MHC owned facilities. All tenants that occupy space at MHC facilities are in scope for Directive #6.

### REFERENCES AND RELATED DOCUMENTS

- Public Hospitals Act 1990
- Regulation 965 Hospital Management
- Ministers Directive: Long Term Care Home COVID-19 Immunization Policy, effective July 1, 2021. Ministry of Health (MOH).
- National Advisory Committee on Immunization (NACI). COVID-19. Retrieved 12-07-2021, from <https://www.canada.ca/en/public-health/services/immunization/national-advisory-committee-on-immunization-naci.html>
- Ontario Agency for Health Protection and Promotion (Public Health Ontario), Provincial Infectious Diseases Advisory Committee. Interim guidance on infection prevention and control for health care providers and patients vaccinated against COVID-19 in hospital and long-term care settings. Toronto, ON: Queen's Printer for Ontario; 2021.
- Directive #6 for Public Hospitals within the meaning of the Public Hospitals Act, Service Providers in accordance with the Home Care and Community Services Act, 1994, Local Health Integration Networks within the meaning of the Local Health System Integration Act, 2006, and Ambulance Services within the meaning of the Ambulance Act, R.S.O. 1990, c. A.19. Issued under Section 77.7 of the Health Protection and Promotion Act (HPPA), R.S.O. 1990, c. H.7
- *HCW Communicable Disease Surveillance Program* policy
- *MHC Corrective Action program*

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