

Category	COVID-19	Policy	
Section	<i>Professional Staff</i>		
Title	COVID-19 Vaccine Program		
Document Owner	Medical Affairs		
Issuing Body	Chief of Staff	ID: COR- PS-A-28.0	
Approved by	Medical Advisory Committee		
Effective Date: August 18, 2021	Revised Date:	Reviewed Date: August 18, 2021	
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Purpose Statement

As per the Provincial direction to mandate vaccinations for health care workers in Ontario, Bluewater Health (BWH) recognizes the importance of this to reduce the risk of serious infection and transmission of infection to our co-workers, patients and families. BWH is accountable to our Professional Staff, employees, volunteers and students to provide a comprehensive COVID-19 vaccination program. BWH is responsible for the operation of a health surveillance program including a communicable disease surveillance program in respect of all persons carrying out activities in the hospital. The purpose of this policy is to align with the provincial mandate and to reduce or eliminate the need to isolate Professional Staff/staff at home due to suspected or probable exposure to COVID-19; and support and protect Professional Staff and employee health and resilience.

Policy Statement

The COVID-19 immunization program is offered by BWH to be consistent with the requirements of the *Occupational Health and Safety Act* (“OHS”) and applicable regulations; and the requirements of the *Public Hospitals Act, R.S.O. 1990* (“PHA”), and all applicable regulations. It is BWH’s obligation to take every precaution reasonable in the circumstances for the protection of the employees under the *Occupational Health and Safety Act* (“OHS”). To that end, the Hospital has an obligation to take precautions reasonable in the circumstances to limit the spread of infectious diseases in the workplace.

The College of Physicians and Surgeons of Ontario has provided the following advice to physicians:

“Having a fully vaccinated health-care profession is critical to minimizing the risk of COVID-19 transmission and/or outbreaks in offices, clinics and hospitals. Even if you do not feel sick, asymptomatic infection and subsequent transmission is possible. The COVID-19 vaccine reduces your chance of becoming infected and is the best way to control the spread of the

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virus, and so getting vaccinated is an essential step to protecting your own health, the health of your patients, and the community at large.

This pandemic offers physicians an opportunity to lead by example. By getting vaccinated, physicians can help relieve the strain on our health-care system and support the health, safety, and well-being of the people of Ontario. The National Advisory Committee on Immunization (NACI) has recognized the unique nature of health care workers' roles and recommended that they be prioritized to receive the COVID-19 vaccine.

COVID-19 – now a vaccine preventable disease – is among the leading causes of death globally and known to have prolonged, wide-ranging impacts. High vaccination rates are important because they help achieve herd immunity and protect people who cannot be vaccinated.

The NACI recommends that all eligible Canadians should be vaccinated against COVID-19 once the vaccine is available to them. While the College recognizes that some physicians cannot get vaccinated due to medical contraindications, those physicians can still provide strong leadership on COVID-19 prevention and continue to advocate for full vaccination of all those eligible.”

It is strongly recommended that all Professional Staff and Employees who work at BWH receive Health Canada approved COVID-19 vaccines to be considered fully vaccinated, unless it is medically contraindicated.

Applicability or Scope

This policy applies to all Professional Staff, including residents/fellows and medical students working on-site at Bluewater Health. It is consistent with the COVID-19 Vaccine Program for employees, volunteers, students, contractors and any other personnel that provide on-site services at BWH.

Responsibilities/Accountabilities

To be considered fully vaccinated, all vaccinated Professional Staff must provide proof of vaccination to Medical Affairs. Medical Affairs will also provide the documentation to Occupational Health and Safety for use in case of an outbreak. Documentation of vaccine status will be kept confidentially in Medical Affairs and also in the Occupational Health and Safety files.

Professional Staff may withhold this information; however, Professional Staff who choose not to declare their status will be deemed not fully vaccinated.

Professional Staff who choose to remain not fully vaccinated or choose not to declare their vaccination status will be required to participate in a mandatory education program, through e-Learning, on the benefits of vaccination.

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All Professional Staff working on site at BWH, will be asked to declare their vaccination status, using the following three categories:

1. I am fully vaccinated and have provided proof of full vaccination to Medical Affairs/ Occupational Health and Safety.
2. I am unable to be vaccinated for medical reasons. (NOTE: Satisfactory Medical certification will be required to be submitted to Medical Affairs and approved by the Chief of Staff).
3. I have elected not to be fully vaccinated at this time/I prefer not to provide BWH with my vaccination status.

All Professional Staff in categories 2 and 3:

- Will be required to participate in a vaccine education module.
- Will be required to participate in the self-administered COVID-19 testing program if present on BWH premises for any work or education-related activities

Professional Staff who are not fully vaccinated or are not vaccinated for medical reasons, or choose not to be vaccinated will be provided with rapid testing kits that must be self-administered at home. Testing requirements will commence on September 7, 2021.

These members of the Professional Staff must produce a test result twice per week by completing a mandatory self-administered rapid COVID-19 antigen test to continue to work on-site. A date stamped photo of the test results must be documented and submitted to Medical Affairs at medical_affairs@bluewaterhealth.ca. If requested, you will be required to submit a retroactive record of your test. You may also be required to submit a random PCR test upon request.

NOTE: Tests are for the exclusive use of the Professional Staff member and are to be used only for routine asymptomatic screening. Educational materials will be provided on how to use the home rapid testing and submit the results.

All Professional Staff will be required to attest at the time of screening that either they have been fully vaccinated or they have completed a self-administered rapid test with a negative test result as required.

The following persons will be required to be fully vaccinated before entering the premises of BWH and have documented proof of this provided to Medical Affairs/Occupational Health and Safety:

- New Professional Staff: Being fully vaccinated is mandatory of all new credentialing applications for Professional Staff
- All residents/fellows and medical students who will be performing any component of their training at BWH

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Occupational Health & Safety:

- Work with Medical Affairs on the compliance reports related to the Professional Staff following the deadline in this policy and as requested thereafter
- Maintain proof of vaccination, medical certificates for Professional Staff as provided by Medical Affairs, and maintain in confidence in the member's health record
- Maintain a list of Professional Staff who have consented to Release their Medical Information in the event of an outbreak
- Monitor and track at home COVID-19 antigen test results for Professional Staff, as forwarded by Medical Affairs

Medical Affairs:

- Medical Affairs will provide all documented reports of vaccination status to Occupational Health and Safety
- Provide compliance reports to the Medical Directors/Chiefs related to the Professional Staff within their Departments following the deadline in this policy and as requested thereafter
- Collect proof of vaccination, medical certificates, and maintain in confidence in Medical Affairs and also in Occupational Health and Safety
- Manage e-Learning assignments and compliance (assigning eLearning's to those who have not provided proof of vaccination, removing eLearning's when proof of vaccination received)
- Track and monitor rapid at home COVID-19 antigen test results submitted, and forward to Occupational Health and Safety

Medical Directors/Chiefs/Chief of Staff:

- Enforce all components of this policy within the Professional Staff
- Provide support to Medical Affairs and Occupational Health & Safety as requested/needed

Failure to comply with the COVID-19 policy may result in discipline up to, and including, suspension or revocation of privileges.

Procedure

It is important for BWH to provide opportunities to protect Professional Staff, employees and patients and will do so through a vaccine, education and rapid testing program. All Professional Staff and employees will have the opportunity to make an informed decision about whether or not to receive the COVID-19 vaccine.

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3. I have elected not to be fully vaccinated at this time/I prefer not to provide BWH with my vaccination status.

All Professional Staff in categories 2 and 3:

- Will be required to participate in a vaccine education module.
- Will be required to participate in the self-administered COVID-19 testing program, if present on BWH premises for any work or education-related activities.
- These tests are meant for regular testing of asymptomatic Professional Staff only and to identify those who may be infectious and at risk of infecting others before coming to work on-site.
- The tests are not to be used by anyone with symptoms or who has a known exposure to someone with COVID-19. Symptomatic and exposed Professional Staff must follow current guidelines to be tested in an assessment center with a PCR test.

Professional Staff who test positive on the rapid test must contact Occupational Health and Safety and arrange for a confirmatory diagnostic PCR test at a testing center. They will need to self-isolate at home pending the result of the confirmatory test.

Professional Staff who are asymptomatic, unvaccinated (or partially vaccinated) and are required to isolate will be placed on a leave of absence from work for the duration of isolation. Clinical stipend payments will be withheld for the duration of the isolation period.

In order to ensure compliance, Medical Directors/Chiefs will receive compliance reports for follow-up. Compliance reports will verify that the COVID-19 program has been completed; however they will not provide information related to which component of the program the Professional Staff has complied with.

Rapid test kits distributed to those Professional Staff in categories 2 and 3, are to be used only by the Professional Staff members who receive them and may not be given or sold to any other person. Failure to comply with the terms of this policy and procedure may result in discipline, up to and including suspension or revocation of privileges.

BWH reserves the right to charge for rapid COVID-19 testing kits. This policy may be revised or changed based on provincial direction. In the absence of provincial direction to Ontario hospitals, the policy will proceed and Professional Staff should plan accordingly.

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Contact Information

For clarification of this policy, please contact Medical Affairs or your Medical Director/Chief.

Evaluation

The policy will be reviewed in accordance with Bluewater Health's Occupational Health and Safety Standard of biannually or as changed through the direction of the provincial guidelines or protocols.

Authority

This policy was authored in consultation with the following stakeholders:

- Human Resources
- Occupational Health and Safety
- Infection Prevention and Control
- Medical Advisory Committee

This policy is issued by the Chief of Staff and approved by the Medical Advisory Committee.

References

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University Health Network (2021) Policy & Procedure Manual. Human Resources:
COVID-19 Vaccine

Legal opinion re: Mandatory Vaccination, including vaccinate or test policy, from Hicks
Morley Hamilton Stewart Storie LLP dated August 6, 2021.

Definitions

Fully vaccinated against COVID:

An individual is defined as fully vaccinated ≥ 14 days after receiving their second dose of a two-dose COVID-19 vaccine series or their first dose of a one-dose COVID-19 vaccine series that is approved by Health Canada.

Related Documents

[Please link to any related documents in the Policy and Document Management System, such as decision trees, algorithms, charts, appendices, etc. If there are no related documents, state *Not Applicable*]