BACKGROUND

Hotel Dieu Grace Healthcare (HDGH) recognizes the importance of immunization of employees/physicians to reduce the risk of serious infection and transmission of infection to co-workers and HDGH patients. The COVID 19 immunization program is in place to meet the requirements of the Public Hospitals Act 1990, Regulation 965, and the Ministry of Health Directive #6. In keeping with HDGH’s mission, vision and values, HDGH is accountable to its staff, physicians, volunteers and students to provide a comprehensive COVID-19 immunization program in the interest of the safety of vulnerable patients and all who perform services in our organization.

PURPOSE

To reduce the risk of serious infection and transmission of the COVID-19 infection to co-workers and HDGH patients.

SCOPE

This policy applies to all HDGH employees and physicians. Please see “COVID-19 Policy on Vaccination for HDGH Volunteers”, “COVID-19 Policy on Vaccination for HDGH Contractors” and “COVID-19 Policy on Vaccination for HDGH Students” for particulars of vaccine requirements for these affiliates who provide services or are learners in our environment.

DEFINITIONS

Staff: All employees of HDGH and Professional Staff

COVID-19 Assessment Centre: A facility, designated by the Province of Ontario, capable of providing COVID-19 testing to members of the public.

Fully Vaccinated: Have received the full series of a COVID-19 vaccine or combination of COVID-19 vaccine approved by Health Canada (i.e., two doses of a two-dose vaccine series, or one dose of a single –dose vaccine series) and have received the final dose of the vaccine at least 14 days ago.
POLICY

HDGH Staff have until September 22, 2021, to receive their first dose of the COVID-19 vaccine unless they provide medical documentation with evidence that they cannot medically tolerate the COVID-19 vaccine or have a Human Rights Code exemption. Both exemptions require review and approval/support by HDGH. Staff who are approved to remain unvaccinated on human rights grounds will be required to participate in an education program on the benefits of COVID-19 vaccination.

Staff that do not receive their first dose of COVID-19 vaccine by September 22, 2021 will be placed on a two-week unpaid leave; or will not be able to exercise their hospital privileges/access HDGH resources for two weeks\(^1\); or will not be allowed to enter HDGH.

Staff that have not received their first dose of COVID-19 vaccine by October 7, 2021 (after the two-week period) shall, as applicable: have their employment terminated; or their privileges suspended on an immediate mid-term basis (with a recommendation going forward to the Medical Advisory Committee that their privileges be revoked/terminated); or not be allowed into HDGH.

Staff that have received their first dose of COVID-19 vaccine by September 22, 2021 or October 7, 2021 as applicable, will be allowed to report to HDGH for work/to provide services/to exercise their privileges and access hospital resources with proof of receipt of their first dose of COVID-19 vaccine subject to them testing twice weekly on Sunday and Wednesday before noon with the Abbott COVID-19 Rapid Antigen Test kits until 14 days after their second dose. If they do not receive their second dose of the COVID-19 vaccine 28 days after their first dose, except for reasons approved by the CEO/COS/CNE shall, as applicable: have their employment terminated; or their privileges suspended on an immediate mid-term basis (with a recommendation going forward to the Medical Advisory Committee that their privileges be revoked/terminated\(^2\)), or not be allowed into HDGH.

Staff who are unvaccinated for an approved valid medical reason or on an approved human rights grounds will be provided Abbott COVID-19 Rapid Antigen Test kits that must be self-administered at home. These Staff will be required to complete a negative test every Sunday and Wednesday before noon, complete online attestation and document this with a photo. Staff may also be required to perform the test virtually with the Health Nurse as required for audit purposes.

Staff who remain unvaccinated on approved human rights grounds will also be required to participate in an education program on the benefits of COVID-19 vaccination.

During any COVID-19 outbreak, all Staff who are unvaccinated for a valid medical reason or on human rights grounds may be offered alternate and comparable work, if available and appropriate, at the discretion of HDGH. This will be done for their safety and the safety of others.

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\(^1\)This will not be deemed to be a suspension pursuant to the By-Law or one which triggers a report to the College of Physicians and Surgeons of Ontario pursuant to the Public Hospitals Act and the Regulated Health Professions Act.

\(^2\)Professional Staff who challenge the immediate mid-term suspension shall not be allowed into HDGH to exercise their privileges/access hospital resources until such time as they exhaust their rights under the By-Law and/or the Public Hospitals Act.
Note: Tests are for the exclusive use of the Staff member and are to be used only for routine asymptomatic screening. Educational materials will be provided on how to use the rapid home testing and the documentation that will be required to be provided for each test.

All Staff will be required to attest during entry screening that either they have been Fully Vaccinated or if not Fully Vaccinated, that they have completed a rapid test with a negative test result when coming on-site to work. Staff not Fully Vaccinated are to conduct a rapid swab twice per week – Sunday and Wednesday before noon regardless of next shift.

To be considered immunized, all vaccinated staff/physicians must provide proof of vaccination to Health Office.

See effective dates for various components of this policy in the “procedure” section below.

PROCEDURE

Staff who have not disclosed their vaccination status or who wish to change their status as of September 9, 2021 are to declare one of the following:

A. I am fully vaccinated. I have received two doses of the COVID-19 vaccine. Note: Proof of vaccination will be required to be submitted to Health Office and once provided, no further action is required.
B. I have received at least one dose of the vaccine and I am scheduled to receive a second dose based on provincial criteria by October 20th, 2021 (documentation is required).
C. I am unable to be vaccinated for medical reasons (documentation meeting the criteria of Directive 6 is required and approved by Health Office).
D. I am unable to be vaccinated at this time on human rights grounds (includes religious grounds, documentation acceptable to HDGH is required).

Staff who disclose C or D above are not required to provide proof of vaccination, however only the following exceptions apply (requirement of Directive 6, issued on August 17, 2021, and this policy):

☐ If there is a valid medical reason, (i.e. documented medical reason for not being Fully Vaccinated against COVID-19 and the effective time-period for the medical reason). This must be provided by a Medical Doctor or Nurse Practitioner.
☐ If there is a valid human rights grounds (including religion) with evidence acceptable to HDGH and in accordance with the Ontario Human Rights Code.

Staff in categories B, C or D arriving on HDGH premises for any work or education related activities will be required to participate in the self-administered COVID-19 testing program. These tests are meant for regular testing of asymptomatic 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 Staff must follow current guidelines to be tested in a COVID-19 Assessment Centre with a PCR test.

Staff required to participate in the self-administered COVID-19 testing program coming to work on-site will be required to be asymptomatic and have completed a negative test prior to entering the worksite. Staff are to conduct a rapid swab test twice per week – Sunday and Wednesday before noon regardless of next shift.

In order to ensure compliance, managers or Program Medical Directors/Medical Affairs will receive/review compliance reports for follow-up. Failure to comply with the terms of this policy, including the prohibition on distributing the rapid tests, may result in discipline, up to, and including, termination of employment or revocation of privileges.

Rapid test kits distributed to those Staff members in categories B, C and D are to be used only by the Staff members who receive them. The rapid tests may not be given or sold to any other person. Failure to comply with the terms of this policy, including the prohibition on distributing the rapid tests, may result in discipline, up to, and including, termination of employment or revocation of privileges.

Staff who originally completed their disclosure prior to implementation of this policy on September 9, 2021 were required provide disclosure of one of the below on or before August 23, 2021:

1. I am fully vaccinated. I have received two doses of the COVID-19 vaccine. Note: Proof of vaccination will be required to be submitted to Health Office and once provided, no further action is required.

2. I have received at least one dose of the COVID-19 vaccine and will receive the second dose when offered or when able to do so, based on HDGH and/or provincial criteria. Note: Proof of 1st vaccination will be required to be submitted to Health Office on or before September 1, 2021 and proof of 2nd dose is required to be submitted to Health Office by October 1, 2021. Health Office will be in touch with individuals in this category for follow up.

3. I am unable to be vaccinated for medical reasons. NOTE: Documentation will be required to be submitted to Health Office for review.

4. I have chosen not to be vaccinated at this time.

5. I prefer not to provide HDGH with my vaccination status.

Staff who disclosed #4 or #5 have until September 22, 2021 to receive their first dose of the COVID-19 vaccine and provide proof, unless they provide medical documentation with evidence that they cannot medically tolerate the COVID-19 vaccine or have a Human Rights Code exemption.

Staff who have a change in vaccination status are to re-submit their disclosure form prior to September 22, 2021.

COVID-19 Vaccine
REFERENCES


