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Huron Perth Healthcare Alliance	
Occupational Health And Safety	Original Issue Date: September 07, 2021
COVID-19 Immunization Policy	Review/Effective Date: September 07, 2021
Approved By: President & CEO	Next Review Date: September 07, 2023

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Scope

This policy applies to all Huron Perth Healthcare Alliance (HPHA) employees, contractors, physicians, midwives, students and volunteers. This policy supplements HPHA's [Healthcare Provider Immunization and Surveillance](#) policy.

All visitors, including patients' families, caregivers and friends ("Visitors"), will be required to wear masks and comply with any of HPHA's other protective measures applicable to Visitors while attending HPHA's premises. Visitors who do not comply with HPHA's policies will not be able to attend HPHA's premises.

Policy

On August 17, 2021, the Chief Medical Officer of Health (CMOH) issued Directive #6 pursuant to section 77.7 of the *Health Protection and Promotion Act* that makes it mandatory for hospitals to have a vaccination policy in effect for their employees, contractors, students and volunteers, effective no later than September 7, 2021.

The intent of a provincial vaccination policy promoting vaccine uptake among health care workers in the hospital, home and community care and ambulance sectors is aligned with the goals and overall provincial response to the SARS-CoV-2 virus (COVID-19) in protecting vulnerable patients who may be health compromised or at risk of being health compromised in settings that face a higher risk of contracting and transmitting COVID-19; protecting staff and health human resource capacity; and reducing the potential for outbreaks, potential disruptions in service and continuity of care.

Hospitals have a duty to care to protect workers under the *Occupational Health and Safety Act* and to protect patients and ensure service continuity under the *Public Hospitals Act*. Healthcare organizations are required to remain vigilant and respond to quickly changing circumstances considering all relevant information at the particular time.

Unvaccinated healthcare workers in higher risk settings such as hospitals pose risks to patients, other healthcare workers, and themselves, and to the capacity of the healthcare system due to potential (re)introduction of COVID-19 into the setting. Given the COVID-19 pandemic and its impact on the health of individuals and communities, and in compliance with Directive # 6, HPHA requires all employees, contractors, physicians, midwives, students and volunteers who do not have a medical exemption to be Fully Vaccinated against COVID-19. HPHA is committed to improving the health system and creating a healthier community, championing a culture of quality and safety, and supporting the health and well-being of our employees, patients and volunteers.

All HPHA employees, contractors, physicians, midwives, students and volunteers are required to submit either proof of COVID-19 vaccination (both vaccine doses) or the COVID-19 declination form prior to the stated deadline of September 7, 2021 as **previously** communicated.

All new hires and students must be Fully Vaccinated by September 30, 2021 or by their first scheduled shift, whichever is earlier. Individuals hired after September 30, 2021 must be Fully Vaccinated prior to their start date.

In the event of an outbreak, individuals with a medical exemption will be redeployed as possible; any persons who are not Fully Vaccinated and do not have a medical exemption, will be sent home on unpaid leave for the duration of the outbreak.

Purpose

The purpose of this policy is to define organizational expectations of HPHA employees, contractors, physicians, midwives, students, and volunteers regarding COVID-19 immunization to reduce the transmission of COVID-19.

In the spirit of "doing no harm" and to meet expectations of a safety oriented healthcare system, all healthcare personnel have a responsibility to take every reasonable action to avoid the transmission of COVID-19.

Healthcare personnel can act as carriers for COVID-19 and may or may not show signs and symptoms. Hospitalized patients are often immunocompromised, vulnerable and at high risk of acquiring COVID-19, and developing serious and sometimes fatal COVID-19 related complications.

HPHA supports the position of the [National Advisory Committee on Immunization \(NACI\)](#) that states:

- 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, be prioritized to receive the COVID-19 vaccine.
- The authorized COVID-19 vaccines recommended for use by NACI have been shown to be safe, as well as efficacious, against symptomatic laboratory-confirmed COVID-19 disease.
- Everyone in Canada should be vaccinated against COVID-19 once the vaccine is available to them.

Clinical Significance

COVID-19 is an acute respiratory illness caused by the coronavirus (SARS-CoV-2) first identified in Wuhan, China in December 2019. Symptoms of COVID-19 can take up to 14 days to appear after exposure to the virus and vary from person to person. Symptoms of COVID-19 include: new or worsening cough, shortness of breath or difficulty breathing, temperature of 37.8° or greater, feeling feverish, chills, fatigue or weakness, muscle or body aches, new loss of smell or taste, headache, gastrointestinal symptoms (abdominal pain, diarrhea, vomiting) and feeling very unwell. Children have been commonly reported to have abdominal symptoms and skin changes or rash. The risk of severe disease increases with age and is elevated in those with underlying medical conditions.

Definitions

COVID-19 Outbreak: defined as two or more healthcare associated COVID-19 cases occurring within 48 hours on a specific unit. The declaration of the outbreak will be made by Infection Prevention & Control in consultation with Huron Perth Public Health.

Immunization: A process by which a person becomes protected against a disease through vaccination. This term is often used interchangeably with vaccination or inoculation.

Medical Contraindication: An accepted medical reason that prevents an individual from receiving the COVID-19 vaccines.

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 the body's natural defenses to build resistance to specific infections and makes the immune system stronger.

Fully Vaccinated: Means a person has received the full series of an accepted COVID -19 vaccine or a combination of accepted vaccines as approved by Health Canada.

Volunteer: As referenced in this policy, a volunteer includes any person acting in an unpaid capacity who does any work for HPHA, including but not limited to the Board of Directors, Local Advisory Committee members, Foundation workers, Patient and Caregiver Partners and Auxiliary staff.

Implementation Phases of the COVID-19 Immunization Policy

Phase One: Assessment Phase (June 23, 2021 – September 7, 2021)

1. All HPHA employees, physicians, midwives and students should make an informed decision about whether to be Fully Vaccinated against COVID-19 and must take **one** of the following actions as outlined below:

- a) Be vaccinated for COVID-19 **and** provide proof of full vaccination to Occupational Health (e-mail: maggie.jinks@hpha.ca, fax: 519-272-8239, phone extension: 2732), or
- b) Where all Health Canada approved COVID-19 vaccines are medically contraindicated, the individual must provide written proof of the medical contraindication from the Medical Officer of Health, Medical Specialist, Family Physician or Nurse Practitioner that indicates (See *Appendix A: Medical Exemption Guidelines*):
 - that the person has a medical exemption that prevents them from being vaccinated against COVID-19; and
 - the effective time period for the medical reason (i.e., permanent or time limited), or
- c) Submit a signed declination form of the decision to not be vaccinated by September 7, 2021.

2. Notice and reminders have been provided since June 23, 2021 for all employees, physicians and midwives to respond to the above request by September 7, 2021. Failure to comply by the above date will be interpreted to mean that a person is no longer interested in maintaining an employment relationship or privileges, as may be applicable, with HPHA and their resignation will be **deemed to be accepted as of 11:59 pm on September 7, 2021**.

Phase Two: Increased Surveillance and Education Phase (September 8 – September 30, 2021)

1. Rapid Antigen Point-of-Care Testing (POCT)

Antigen POCT does not replace requirements to protect the health and safety of patients and staff. Antigen POCT can be used as an additional screening tool; however it does not replace public health measures such as vaccination, symptom screening, physical distancing, masking and hand hygiene.

- a) Effective September 8, 2021, any HPHA employee, contractor, physician, midwife or student who elects **not** to be vaccinated, is partially vaccinated or has a medical exemption against COVID-19 vaccination will be required to perform a rapid antigen POCT at home up to 48 hours prior to each shift. Refer to *Appendix B: Rapid Point-of-Care Testing Schedule Examples* for details on when swabbing is required based on individual schedules. If an unscheduled shift is accepted, a rapid test is required within 48 hours prior to reporting to work. **Rapid Antigen POCT Instructions**.
- b) Verification of negative results must be submitted at <https://www.hphascreening.ca/>.
- c) When reporting to work, upon entry screening, staff will attest to completion of a rapid test as required.

Note: Persons who test positive on a rapid antigen self-test must not report to work and are to contact Occupational Health and arrange for a PCR test at an assessment centre. Persons will need to self-isolate at home pending the result of the confirmatory test.

Note: Distribution and/or sale of the rapid antigen test kits provided by HPHA may result in disciplinary action.

2. Educational Program

In addition to the above, anyone who is not Fully Vaccinated will be required to complete the COVID-19 Vaccine Information E-learning training module by September 30, 2021. The HPHA COVID-19 Vaccine Information E-learn training module on eTRAIN addresses all of the following learning components:

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccines;
- Benefits of vaccination against COVID-19;
- Risks of not being vaccinated against COVID-19; and
- Possible side effects of COVID-19 vaccination.

3. Support for Vaccination

HPHA will provide the following supports for people with respect to vaccinations:

- Peer-to-Peer support
- HPHA Occupational Health and Physician Champions are key resources to support vaccine confidence and uptake, and can provide specific educational materials related to a person's expressed concerns so that they may make a fully informed decision.
- On-site COVID-19 vaccination (offered every Wednesday by appointment by the Occupational Health Nurse)
- Provision to attend offsite vaccination with paid work time through the Ontario COVID-19 Worker Income Protection Benefit as necessary.

Phase 3: Mandatory Vaccination Phase October 1 – November 12, 2021

Pursuant to Directive #6, HPHA will follow the CMOH directive that all Covered Organizations must establish, implement and ensure compliance with a COVID-19 vaccination policy that requires its employees, contractors, physicians, midwives, volunteers and students to provide:

- a. Proof of Full Vaccination against COVID-19; or
- b. Written proof of a medical reason, provided by a physician or registered nurse in the extended class that sets out:
 - (i) a documented medical reason for not being fully vaccinated against COVID-19, and
 - (ii) the effective time period for the medical reason.

Phase 3 Details for employees, volunteers and students:

HPHA's Occupational Health team is a key resource to support vaccine confidence and uptake. After the September 30, 2021 mandatory HPHA deadline, Occupational Health will coordinate individual meetings to be held October 1-28, 2021 with employees, volunteers and students that are either unvaccinated or partially vaccinated, and do not have a medical exemption. The purpose of these meetings is to provide specific educational materials related to their expressed concerns so they may make a fully informed decision.

Any person who is not Fully Vaccinated as of September 30, 2021 will continue the rapid antigen POCT as outlined above.

On October 28, 2021, any employee that has not received their first dose, or who has met the time interval for their second dose, but has not received the second dose, will be placed on a 2-week leave of absence with no compensation for employees.

On or before November 12, 2021,

1. The **employee** will submit proof of first dose COVID-19 vaccination, and submit booking confirmation for the second dose booking.

Or

2. The **employee** will submit proof of second dose COVID-19 vaccination.

Or

3. The **employee** will have been deemed to have resigned their position from HPHA for non-compliance with this policy.

Phase 3 Details for physicians and midwives:

After the September 30, 2021 mandatory HPHA deadline, the Chief of Staff will coordinate individual meetings to be held October 1-28, 2021 with physicians and midwives that are either unvaccinated or partially vaccinated, and do not have a medical exemption. The purpose of these meetings is to provide specific educational materials to physicians and midwives related to their expressed concerns so they may make a fully informed decision.

On October 28, 2021, any physician or midwife that has not received their first dose, or who has met the time interval for their second dose, but has not received the second dose, will be deemed unable to exercise their privileges at HPHA for a 2-week period.

On or before November 12, 2021,

1. The **physician/midwife** will submit proof of first dose COVID-19 vaccination, and submit booking confirmation for the second dose booking.

Or

2. The **physician/midwife** will submit proof of second dose COVID-19 vaccination.

Or

3. The **physician/midwife** will have been deemed to have resigned their privileges at HPHA and will no longer be able to exercise them for non-compliance with this policy.

Confidentiality Statement

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

References
1. COVID-19 Directive #6 for Public Hospitals. Issued under Section 77.7 of the Health Protection and Promotion Act. Issued Aug 17, 2021.
2. Occupational Health and Safety Act.
3. Ontario Human Rights Commission (OHRC). COVID-19 and Ontario's Human Rights Code – Questions and Answers. COVID-19 and Ontario's Human Rights Code – Questions and Answers Ontario Human Rights Commission (ohrc.on.ca)
4. National Advisory Committee on Immunizations (NACI). Recommendations on the use of COVID-19 vaccines . July 22, 2021.
5. Public Hospitals Act, R.S.O. 1990, Reg. 965: Hospital Management www.ontario.ca/laws/statute/90p40
6. Resource Guide to Directive #6. August 18, 2021.



APPENDIX A: HPHA COVID-19 VACCINE MEDICAL EXEMPTION GUIDELINES

The Medical Officers of Health for Huron Perth Public Health (HPPH), Middlesex-London Health Unit (MLHU), and Southwestern Public Health (SWPH) consider the following conditions the **only** absolute medical exemptions from the COVID-19 vaccine:

- Documented anaphylaxis to a previous dose of COVID-19 vaccine or documented anaphylaxis to one of the vaccine components in authorized, available COVID-19 vaccines:

Vaccine product	Potential allergen included in the vaccine or its container
Pfizer-BioNTech COVID-19 vaccine	Polyethylene glycol (PEG)
Moderna COVID-19 vaccine	PEG
	Tromethamine (trometamol or Tris)
AstraZeneca COVID-19 vaccine	Polysorbate 80

Note: See NACI's [Recommendations on the use of COVID-19 vaccines](#), Table 4 for complete details

These recommendations are in accordance with the guidance expressed by the National Advisory Committee on Immunizations (NACI) as of July 22, 2021 on **non-medicinal ingredients of authorized, available COVID-19 vaccines** that have been associated with allergic reactions in other products.

First Dose Reactions:

Those who have received one dose of COVID vaccine and have a reported vaccine adverse reaction and are waiting review from their local Medical Officer of Health, or have been referred for further evaluation to a Medical Specialist will be exempt from getting their second dose until such time the Medical Officer of Health or Specialist has made their recommendations.

Acceptable Documentation for Medical Exemption:

Letter or documentation from a local Medical Officer of Health, family physician, medical specialist, or nurse practitioner which specifies the exact allergen to which the person is allergic.

References:

LTR Regional Medical Officer of Health Letter. June 28, 2021

National Advisory Committee on Immunizations (NACI). [Recommendations on the use of COVID-19 vaccines](#). July 22, 2021.



APPENDIX B: RAPID POINT OF CARE TESTING SCHEDULE EXAMPLES

Fulltime: Monday – Friday

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Work 0800-1600 *Required to swab Monday before shift or Sunday night.*	Work 0800-1600	Work 0800-1600 *Required to swab Wednesday before shift or Tuesday night.*	Work 0800-1600	Work 0800-1600 *Required to swab Friday before shift or Thursday night.*	

Fulltime: Waterfall Rotation

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Work 0700-1900 *Required to swab Monday before shift or Sunday night.*	Work 0700-1900	Work 1900-0700 *Required to swab Wednesday before shift or Tuesday night.*	Work 1900-0700		

Fulltime: Continental Rotation

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
	Work 0700-1900 *Required to swab Monday before shift or Sunday night.*	Work 0700-1900			Work 0700-1900 *Required to swab Friday before shift or Thursday night.*	Work 0700-1900
Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Work 0700-1900 *Required to swab Sunday before shift or Saturday night.*			Work 0700-1900 *Required to swab Wednesday before shift or Tuesday night.*	Work 0700-1900		

Part time/Casual: Please ensure you have done a swab at minimum 48 hours before a shift, including any 'unscheduled shifts' you may pick up.

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
Work 0700-1500 *Required to swab Sunday before shift or Saturday night.*			Work 1900-0700 *Required to swab Wednesday before shift or Tuesday night.*	Work 1900-0700		

If you have any questions about when you're required to swab. Please call Chrissy Faulhafer (Ext: 2727) or Maggie Jinks (2732)