

 Middlesex Hospital Alliance Strathroy Site <input checked="" type="checkbox"/> Four Counties Site <input checked="" type="checkbox"/>		Policy <input checked="" type="checkbox"/> Procedure <input checked="" type="checkbox"/> Standard <input type="checkbox"/>
Subject: COVID-19 Vaccination Policy		
Owner: <i>Occupational Health Specialist</i>	Reviewer(s): <i>Pandemic Operations Committee Senior Leadership Council</i>	Approver: <i>Director of Human Resources</i>
Cross Reference:		

SCOPE:

This policy applies to all Middlesex Hospital Alliance workers. “Workers” are defined throughout this policy as MHA employees, physicians and credentialed staff, contracted staff/affiliates and other contractors, students, volunteers (including but not limited to Board of Directors, Local Advisory Committee members, Foundation staff, Auxiliary, members of the Patient and Family Advisory Committee) and tenants who are working at, or may be required to report to, an MHA site. All contractors with whom MHA has an agreement will be responsible for ensuring that their employees’ vaccination status aligns with MHA requirements.

PURPOSE:

The purpose of this policy is to outline organizational expectations with regards to COVID-19 vaccination and the procedures applicable to MHA workers.

BACKGROUND:

This policy was created at the direction of the Chief Medical Officer of Health in compliance with Directive #6 (issued August 17, 2021) 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 employees, staff, contractors, students and volunteers.

COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus. It is characterized by fever, cough, shortness of breath and a number of other symptoms. Asymptomatic infection and subsequent transmission has been documented. 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.

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, 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.

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.

POLICY:

MHA is committed to maintaining a healthy and safe environment for all of its workers and patients. To this end, and given the ongoing COVID-19 pandemic and its impact on the health of individuals and communities, MHA requires that all workers be fully vaccinated against COVID-19, subject to having a valid medical or other human rights exemption.

Pre-Placement/Pre-employment:

Newly hired or contracted MHA workers must comply with **ONE** of the following actions:

- Provide proof of full vaccination OR
- Provide proof of valid medical or other human rights reason the worker cannot be vaccinated

Workers with a valid medical or other human rights reason they cannot be vaccinated against COVID-19 will be subject to MHA's Rapid Antigen Screening Program in accordance with Directive #6. Please refer to the [COVID-19 Rapid Antigen Screening Program policy](#) for details.

Current Workers:

Phase One:

Further to MHA's earlier vaccination policy of September 10, 2021, all current MHA workers must have complied with **ONE** of the following options by **September 24, 2021**:

- Provide proof of full vaccination OR
- Provide proof of valid medical or other human rights reason the worker cannot be vaccinated OR
- Complete the MHA COVID-19 education program and sign the COVID-19 declination form.

The purpose of the MHA COVID-19 education program is to help inform workers about COVID-19 vaccination so they may make a fully informed decision. The program includes the following minimum content:

- how COVID-19 vaccines work;
- vaccine safety related to the development of the COVID-19 vaccines;
- the benefits of vaccination against COVID-19;
- risks of not being vaccinated against COVID-19;
- possible side effects of COVID-19 vaccination.

Please contact our Occupational Health Specialist at ext. 5583 or occhealth@mha.tvh.ca if you need to complete the MHA COVID-19 education program and it has not yet been assigned to you.

Workers with a valid medical or other human rights reason they cannot be vaccinated against COVID-19, or those who have completed the education program and submitted a COVID-19 declination form, will be

subject to MHA's Rapid Antigen Screening Program in accordance with Directive #6. Please refer to the [COVID-19 Rapid Antigen Screening Program policy](#) for details.

Workers who have not provided their proof of vaccination, proof of valid medical or other human rights reason they cannot be vaccinated, or a signed COVID-19 declination form by **September 24, 2021**, will not be permitted to attend at an MHA site and may be subject to disciplinary action up to and including termination, suspension of or loss of privileges, or termination of contract or placement.

Phase Two:

By **November 29, 2021**, all current MHA workers are required to provide proof that they are fully vaccinated¹ against COVID-19 or to provide proof of a valid medical or other human rights reason they cannot be vaccinated against COVID-19. For greater clarity, the educational program and COVID-19 declination form option will no longer be available after **November 29, 2021**.

Workers who have a valid medical or other human rights reason why they cannot be vaccinated against COVID-19 will continue to be subject to MHA's Rapid Antigen Screening Program in accordance with Directive #6. Please refer to the [COVID-19 Rapid Antigen Screening Program policy](#) for details.

Any MHA employee who has failed to comply with the **November 29, 2021** deadline will be placed on a two-week, unpaid leave of absence to allow them more time to review resources and consider vaccination or gather proof of a valid medical or other human rights reason the employee cannot be vaccinated. At the end of this two-week period, employees are expected to return to work having satisfied one of the two available options (i.e., proof of full vaccination or proof of an exemption). If an employee does not satisfy one of the two available options by the end of this two-week period, they will be subject to further action, up to and including termination.

Any other MHA workers (including physicians and credentialed staff) who have not provided their proof of vaccination or proof of valid medical or other human rights reason they cannot be vaccinated by **November 29, 2021**, will not be permitted to attend at an MHA site and will be subject to further action, up to and including suspension of or loss of privileges, or termination of contract or placement.

PROCEDURE:

Pre-Placement/Pre-employment:

1. For new workers, proof of vaccination must be provided prior to the first scheduled shift in the organization or attendance at an MHA site, whichever is first. Proof of vaccination must be sent to Occupational Health Services via email (occhealth@mha.tvh.ca) or provided in person.
2. For those who cannot be vaccinated due to a medical reason/contraindication, proof of the medical reason must be provided. Where all Health Canada approved COVID-19 vaccines are medically contraindicated, the individual must have the MHA [medical exemption form](#) completed by their physician or nurse practitioner setting out a documented medical reason that they cannot be vaccinated against COVID-19 and the effective time period for the medical reason (e.g., permanent or time limited). The medical exemption form must be submitted to Occupational Health Services via email (occhealth@mha.tvh.ca) or in person. Additional information may be requested by OHS as needed to verify a medical exemption. It is the responsibility of OHS to follow-up with all staff who have submitted a time-limited medical exemption form.

¹ For the purposes of this Policy, "fully vaccinated" means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by WHO (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and having received the final dose of the COVID-19 vaccine at least 14 days ago.

3. Any other request for accommodation under the Ontario Human Rights Code, outside of disability/medical condition, must be directed to our Occupational Health Specialist at ext. 5583 or occhealth@mha.tvh.ca with evidence to substantiate the need for the type of accommodation being requested. MHA will work with the new worker to gather any additional information required and to determine the appropriate accommodation, if applicable.
4. Workers with a valid medical or other human rights reason they cannot be vaccinated against COVID-19 will be subject to MHA's Rapid Antigen Screening Program in accordance with Directive #6. Please refer to the **COVID-19 Rapid Antigen Screening Program policy** for details.

Current Workers:

1. Current workers are required to become fully vaccinated against COVID-19, and to provide proof of vaccination or proof of a medical or other human rights reason they cannot be vaccinated, by no later than **November 29, 2021**.
2. In the meantime, and further to MHA's earlier vaccination policy of September 10, 2021, by no later than **September 24, 2021**, workers must provide proof of full vaccination, proof of a medical or other human rights reason they cannot be vaccinated, or a signed COVID-19 declination form confirming they have completed the MHA COVID-19 education program. Signed declination forms must be submitted to Occupational Health Services via email (occhealth@mha.tvh.ca) or in person.
3. Proof of vaccination must be submitted to Occupational Health Services via email (occhealth@mha.tvh.ca) or in person, and must be provided as it becomes available. For instance, if the worker has only received the first dose of a two-dose COVID-19 vaccination series approved by Health Canada, proof of administration of the first dose must be provided right away. Proof of the second dose must be provided as soon as possible after administration of the second dose.

If an individual has received the COVID-19 vaccine in Ontario, the only acceptable proof of vaccination is the receipt provided by the Ministry of Health or any other government-issued proof that may become available in the future. For people who have been vaccinated outside of Ontario, acceptable proof is based on the criteria provided by the province/state in which they received their vaccine, but only World Health Organization (WHO) approved vaccines will be accepted. Proof shall include your name, date of birth, date of vaccination, vaccine name, lot number, and name of the health care practitioner administering the vaccine. An individual who does not have a copy of their vaccination can download their COVID-19 vaccine receipt here: <https://covid19.ontariohealth.ca/>

4. For those who cannot be vaccinated due to a medical reason/contraindication, proof of a valid medical exemption must be provided. Where all WHO approved COVID-19 vaccines are medically contraindicated, the individual must have the MHA **medical exemption form** completed by their physician or nurse practitioner setting out a documented medical reason that they cannot be vaccinated against COVID-19 and the effective time period for the medical reason (e.g., permanent or time limited). Proof of medical exception must be sent to Occupational Health Services via email (occhealth@mha.tvh.ca) or in person. It is the responsibility of OHS to follow-up with all staff who have submitted a time-limited medical exemption form. Additional information may be requested by OHS as needed to verify a medical exemption.

5. Any other request for accommodation under the Ontario Human Rights Code, outside of disability/medical condition, must be directed to our Occupational Health Specialist at ext. 5583 or occhealth@mha.tvh.ca with a detailed rationale to substantiate the need for the type of accommodation being requested. MHA will work with the worker to gather any additional information required and to determine the appropriate accommodation, if applicable.
6. For students already on site, the same requirements apply; however, each student's status will be verified, managed and tracked by the student's school. MHA will be responsible for orientating the schools to this policy.
7. For contracted staff working on site, the same requirements apply; however, the employer of the contracted staff member will be responsible for verifying, managing and tracking the worker's status. MHA will be responsible for orientating the employer to this policy.
8. Workers who are not vaccinated are subject to restrictions that do not apply to vaccinated staff.
 - As indicated above, those MHA workers who are not fully vaccinated for any reason will be required to participate in a COVID-19 antigen-testing program. Please refer to **COVID-19 Rapid Antigen Screening Program policy** for complete details. Staff requiring rapid antigen testing must contact Occupational Health Services at ext. 5583 or by email at occhealth@mha.tvh.ca to arrange pick up of their test kits by **September 24, 2021**.
 - Those who have not been vaccinated with both doses will be excluded from work without pay should they have a high risk contact with a positive COVID-19 person; subject to public health guidelines.
9. MHA Workers vaccination status or medical/human rights exemption will be tracked by OHS and records will be kept on behalf of the Hospital. The information and records will be stored securely and used for purposes of administering and enforcing this policy and its related health and safety purposes. This information will only be accessible by or shared with others on a need to know basis, except as may be required by law
10. Where proof of full vaccination, or proof of a valid medical or other human rights reason the worker cannot be vaccinated, is not submitted, regardless of training completion, it will be assumed the worker or volunteer is not vaccinated for the purposes of contact tracing, outbreak management, implementation of this policy, and imposing disciplinary measures.
11. Failure to adhere to this policy or any attempt to provide false proof of vaccination, false proof of a medical reason (or other human rights reason) for not being vaccinated, a false declination form, or false COVID-19 test results may result in disciplinary action, up to and including termination, suspension of or loss of privileges, or termination of contract or placement.

REFERENCE:

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

[Ministry of Health \(May 31, 2021\). Resource Guide: Ministers Directive: Long Term Care Home COVID-19 Immunization Policy.](#)

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-onimmunization-naci.html>

[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 \(gov.on.ca\)](#)

Directive #6 [RESOURCE GUIDE \(gov.on.ca\)](#)

National Advisory Committee on Immunization (NACI) [Recommendations on the use of COVID-19 vaccines](#)