

Policy Name:	COVID-19 Vaccination
Category:	Human Resources
Approved by:	Board of Directors
Approval/Revision Date:	12/01/2021
Review Date:	Ongoing
Scope:	All CMCP Staff, Students on Placement, Volunteers and Essential Visitors

PURPOSE

COVID-19 is an infectious disease caused by the novel coronavirus and was declared a global pandemic by the World Health Organization on March 11, 2020. This policy is based on directives from the Ontario Government, guidance from public health authorities and is in accordance with CMCP's obligations under the *Occupational Health and Safety Act* (OHS). It is also aligned with CMCP's commitment to protecting the health and well-being of staff, students on placement, volunteers, and essential visitors.

POLICY

Within 60 calendar days of this policy coming into effect, all CMCP staff, students on placement, volunteers and essential visitors to a CMCP site, are required to be fully vaccinated with a recognized COVID-19 vaccine, unless approved for exemption.

Current staff, students on placement and volunteers are required to submit a Declaration of Vaccination Status form(s) to the Executive Assistant and provide proof.

Individuals who wish to request an exemption based on a protected ground under the Ontario Human Rights Code (OHRC) must submit the following to CMCP's Executive Director:

1. A written request for exemption, outlining the reason for the request (ie, the protected ground under the OHRC).
2. A COVID-19 Medical Exemption Form completed by a licensed physician or registered nurse practitioner, that includes: (i) confirmation of medical exemption for not being fully vaccinated against COVID-19; and (ii) the effective time-period for the exemption; or,
3. Relevant documentation related to another protected ground under the Ontario Human Rights Code.

Unvaccinated staff, students on placement and volunteers must participate in an educational session provided by CMCP, with the exception of those individuals who have received an approved medical/disability exemption.

Individuals with approved exemptions will continue to follow personal protections, in compliance with public health guidelines, and will also be required to undertake Rapid Antigen testing.

Any students on placement, essential visitors or volunteers who do not comply with this policy will not be granted entry to a CMCP facility.

Any CMCP staff who does not comply with this policy may be subject to discipline, up to and including termination.

This policy will be regularly reviewed and updated to match the most current pandemic conditions, and to reflect up-to-date evidence and public health guidance.

DEFINITIONS

Designated CMCP staff: Authorized staff responsible for confirming information of staff, students on placement, volunteers or essential visitors.

Essential visitor to CMCP: Resource consultants, regulators, inspectors, contractors or any other external service provider who requires access to CMCP sites and programs.

Fully vaccinated against COVID-19:

An individual is considered “fully vaccinated” if:

- They have received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada or the World Health Organization (WHO), in cases where individuals received vaccinations outside of Canada; and
- It is 14 or more days since they received their final dose of the COVID-19 vaccine.

COVID-19 vaccination proof:

- For an individual partially or fully vaccinated,
 - in Ontario, the receipt provided by the Ministry of Health;
 - in Canada but outside of Ontario, the receipt provided by the provincial or territorial Health Ministry or approved vaccine passport/certificate, or
 - outside of Canada, a receipt for World Health Organization approved vaccines.

Rapid Antigen Testing: A point of care screening test (POCT) for COVID-19 that can be administered by a physician, trained nurse practitioner or a trained individual. <https://covid-19.ontario.ca/provincial-antigen-screening-program>

PROCEDURE

1. Application of this Policy

- Current CMCP staff, students on placement and volunteers have up to 15 calendar days from the effective date of this Policy to declare their vaccination status to CMCP. Individuals requesting an exemption must also provide the required documentation within this time period. Any CMCP staff, students on placement or volunteers who have disclosed that they are **not** fully vaccinated, and who have not requested an exemption, will have a further 45 days from the disclosure deadline, to become fully vaccinated and provide proof.
- As of the policy effective date, all new staff, students or volunteers must be fully vaccinated prior to starting employment or placement. Essential visitors are required to provide proof of full vaccination, or exemption and negative Rapid Antigen test result as outlined in Section 5.
- CMCP may provide an extension of a reasonable duration, on a case-by-case basis, where it is determined that there are unforeseen or extenuating circumstances outside of the control of the individual that impede the individual from meeting the time requirements outlined above.

2. Disclosure of Vaccination Status

- There are three categories of COVID-19 vaccination status. These are:
 - ⊖ Fully vaccinated, or
 - ⊖ Partially vaccinated, or
 - ⊖ Not vaccinated and not pursuing vaccination.

- All staff, students on placement and volunteers are required to complete a Declaration of Vaccination Status form and submit it to Human Resources within the timeframes outlined in Section 1 of this policy.
- Proof of partial or full vaccination or exemption is to be provided to Human Resources as an attachment to the Declaration of Vaccination Status form, via email or in a hard copy via interoffice mail (Note: original documents are not required and copies of documentation should not include personal health information such as OHIP numbers and diagnoses).
- Individuals who have received vaccinations in Ontario but do not have a vaccination record document to submit, may access these documents through the provincial online portal: <https://covid19.ontariohealth.ca/> or by calling the Provincial Vaccine Booking Line at 1-833-943-3900.
- Essential visitors are required to disclose and provide proof of vaccination status prior to, or at the time of, their visit.
- All documentation of vaccination status for staff, students on placement and volunteers will be stored in a secure and confidential manner in compliance with all legal requirements.
- No medical or personal health documentation of essential visitors will be kept by CMCP.
- Individuals who have disclosed and provided proof of receiving only the first dose of a COVID-19 vaccination series, will be required to undertake rapid antigen screening tests as outlined in this policy, until proof of completion of their vaccination series has been provided, or for the duration of the exemption timeframe.
- CMCP may require further declarations, including if and when additional vaccination is recommended or required by the Ontario Government or local Public Health Unit.

3. Exemption from COVID-19 Vaccination

Requests for exemption will be carefully considered in the context of the Ontario Human Rights Code and processed in a timely manner. Individuals whose requests are declined must be fully vaccinated within 60 days of receiving the decision.

3.1 Medical/Disability Exemptions

- CMCP will utilize a recognized third party health assessment provider that will receive and review all information required to assess medical/disability exemptions.
- Staff, students on placement, and volunteers who are unable to be fully vaccinated for medical/disability reasons, will be required to submit to the health assessment provider a COVID-19 medical exemption form completed by a licensed physician or registered nurse practitioner, that sets out:
 - the reason the individual cannot be fully vaccinated against COVID-19; and
 - the effective time period for the exemption.
- If the medical/disability exemption is time specific, the individual must provide a renewed exemption prior to expiry. If the medical/disability exemption is not renewed, the individual has 60 days from the date of expiry to provide proof of full vaccination in accordance with sections 1 and 2 of this policy.
- The individual will be required to be tested, as per Section 5 of this policy, until they are fully vaccinated.
- Essential visitors who are unable to be fully vaccinated for a medical/disability reason, must provide to designated CMCP staff, a COVID-19 medical exemption form,

completed by a physician, that sets out: (i) confirmation of medical exemption for not being fully vaccinated against COVID-19 that does not include personal health information (e.g. OHIP number, diagnosis), and (ii) the effective time-period for the exemption.

- Essential visitors with a medical/disability exemption are required to undertake rapid antigen testing prior to entering a CMCP facility, except if the individual has done rapid antigen testing for their own employer. In this case, the essential visitor must provide their attestation of a medical/disability exemption and a negative test result before entering a CMCP facility.
- Essential visitors must provide this information (medical/disability exemption and negative testing results) at each visit. CMCP will not retain any visitor medical or health information.

3.2 Exemptions based on Protected Grounds

- CMCP recognizes its responsibilities and duties under the Ontario Human Rights Code. If staff, students on placement and volunteers are unable to be vaccinated due to a protected ground as defined by the Code, CMCP will consider requests for exemptions and reasonable accommodation to a point of undue hardship. Such requests must be submitted to HR within 15 days of this policy taking effect or without delay upon hire/ placement.
- An individual may apply for an exemption due to a protected ground. Requests should be submitted in writing to HR. Information provided to support the exemption request may be disclosed to CMCP's Executive Director and/or legal counsel to assist in evaluating the exemption request and deciding on reasonable accommodation.
- Staff, students on placement and volunteers with approved exemptions on a protected ground will be required to attend an education session approved by CMCP.
- The individual will also be required to be tested, as per Section 5 of this policy, until they are fully vaccinated.
- Essential visitors with an exemption based on a protected ground are required to undertake rapid antigen testing, except if the individual has done rapid antigen testing for their own employer. In this case, the essential visitor must provide their attestation of an exemption and a negative test result before entering a CMCP facility.
- Essential visitors must provide this information (exemption and negative testing results) at each visit. CMCP will not retain any visitor medical or health information.

4. Educational Program about the COVID-19 Vaccination

- Staff, students on placement or volunteers who have not disclosed proof of full vaccination for COVID-19, except those with an approved medical/disability exemption, are required to complete an educational session that provides information about:
 - 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; and
 - possible side effects of COVID-19 vaccination.
- Individuals who have submitted a request for medical/disability exemption will not be required to complete an educational session until such time as their request has been reviewed and a decision has been made. If the request is approved, the individual is not required to complete the educational session. If the request is denied, the individual must complete the educational session as outlined in this section.

- CMCP will provide links to approved education programs. Individuals will be required to complete the educational session on their own time and within a timeframe specified by Human Resources.
- Individuals will be required to attest to completion of the educational session.
- Essential visitors will not be required to attend an educational session.

5. Rapid Antigen Testing

5.1 Administration of Tests

- After the initial disclosure period of 15 days, staff, students on placement or volunteers who are not fully vaccinated will be required to undergo Rapid Antigen testing until proof of full vaccination is provided. Exempt individuals are also required to undertake rapid antigen testing on an ongoing basis.
- The costs associated with obtaining Rapid Antigen tests will be the responsibility of staff, students on placement, and volunteers.
- Individuals who are not fully vaccinated and cannot present a negative test result will not be granted access to a CMCP Facility. Tests must be completed within 48 hours prior to attending a CMCP facility. Only individuals with a negative test result may enter a CMCP facility.
- Information about how to complete a rapid antigen test is available at the following links:
English:
<https://www.ontariohealth.ca/sites/ontariohealth/files/2021-08/PASP-COVID19-Self-Testing%20Instrucitons.docx>
French: <https://www.ontariohealth.ca/sites/ontariohealth/files/2021-08/PASP-COVID19-SelfTesting%20Instructions-FR.docx>
- Essential visitors must complete any required testing prior to arrival at CMCP and at their own cost and on their own time. Essential visitors who have undertaken rapid antigen testing for their own employer, are not required to duplicate testing prior to entry at CMCP facility but must provide proof of negative test results conducted within the previous 48 hours.

5.2 Test Results

- If a staff, student on placement, volunteer or essential visitor is confirmed to have a positive COVID-19 rapid antigen screening test result they are not permitted to attend a CMCP facility.
- A positive result on a rapid antigen test is considered a preliminary (presumptive) positive result for COVID-19.
- Individuals are required to inform CMCP immediately of the preliminary results and are required to undertake a confirmatory lab-based PCR test at a COVID-19 Assessment Centre as soon as possible (ideally within 48 hours) and follow the directions of their physician or Toronto Public Health.
- Please refer to CMCP's COVID-19 policy regarding returning to work and consult the Sick - Illness Leave and Medical Leave policies for leave eligibility.

- In situations where staff are feeling well enough to work from home and their role allows them to do so, managers/directors may approve remote work during the self-isolation period, as per CMCP's COVID-19 policy.
- If an individual has had a laboratory-confirmed COVID-19 infection they should not participate in antigen testing for 90 days following the date of their positive COVID-19 test result. These individuals should immediately resume COVID-19 rapid antigen testing after the 90th day.
- CMCP will report any positive test results to regulators as required and within stipulated timeframes.

6. Records of Proof of Vaccination, Medical Exemptions and Testing

- CMCP will maintain all records of COVID-19 vaccination status, exemptions and testing results for staff, students on placement and volunteers in a secure and confidential manner in compliance with applicable legal statutes. This information will be stored separate from other employment-related personal information collected by CMCP.
- For essential visitors, proof of COVID-19 vaccination status, testing results and/or exemptions will be presented at the time of each visit. These records will not be collected, retained or stored by CMCP. A designated CMCP staff will verify proof provided and the visitor will sign an attestation to verify compliance with this policy. The attestations will be maintained for the purpose of reporting.
- CMCP may be required to report statistical information to regulators and/or government. No identifying information will be provided in relation to this policy; only statistical information will be provided in anonymous, aggregate form unless identifiable information is required by law.

7. Consequences for not complying with policy

- Staff who do not comply with this policy may be subject to discipline, up to and including dismissal.
- Any student seeking placement in a CMCP program who does not comply with this policy will not be accepted for placement.
- Volunteers and essential visitors who do not comply with this policy will not be granted entry to a CMCP facility.

FORMS/ATTACHMENTS

- COVID-19 Vaccination Policy Sign-off
- Declaration of Vaccination Status
- COVID-19 Vaccination Education Attestation
- Essential Visitor Attestation

CROSS REFERENCE

- <https://news.ontario.ca/en/release/1000750/ontario-makes-covid-19-vaccination-policies-mandatory-for-high-risk-settings>
- *Occupational Health and Safety Act* (Ontario)
- *Human Rights Code* (Ontario)
- *Workplace Safety and Insurance Act* (Ontario)
- *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*

- *Child Care and Early Years Act (Ontario)*

CMCP Policies:

- *COVID-19*
- *Sick - Illness Leave*
- *Progressive Discipline*
- *Medical Leave*

 <p>COLLEGE- MONTROSE Children's Place</p>	<p>COVID-19 VACCINATION POLICY SIGN OFF</p>
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This policy and procedure must be read and signed off by all staff, students on placement and volunteers, prior to commencing employment/placement at CMCP and at any time when a change is made to the policy.

I have read and understand this policy and its required procedures.

Name (Please Print)

Employee Signature

Date