

## COVID-19 Vaccination Policy

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### Introduction

COVID-19 is a respiratory disease that has caused significant morbidity and mortality both globally and locally in Simcoe Muskoka. As of August 2021, there have been over half a million cases in Ontario and almost 10,000 deaths. Widespread measures like stay-at-home orders, closures of public spaces, physical distancing, and universal masking have been necessary to prevent infections, prevent deaths, and protect the healthcare system's capacity to treat individuals who become ill. Vaccination is an important intervention that prevents the spread of COVID-19 and has contributed to decreasing cases and deaths in Canada throughout the spring of 2021.

### Rationale

There are several reasons to promote vaccination among Simcoe Muskoka District Health Unit (SMDHU) Staff, including the following:

#### *SMDHU Staff are healthcare workers.*

The National Advisory Committee on Immunization considers healthcare workers a priority population for COVID-19 vaccination due to their increased risk of exposure to SARS-CoV-2 and their critical role in maintaining healthcare system capacity (Young et al., 2021). Almost a quarter of cases of COVID-19 during the first wave were among healthcare workers, demonstrating their increased exposure risk (Public Health Agency of Canada, 2021a). SMDHU Staff are at increased risk of exposure through the provision of direct clinical care at sexual health clinics, tobacco cessation workshops, prenatal classes, dental clinics, breastfeeding clinics, home visiting services and the provision of other frontline services. SMDHU Staff are also at increased risk of exposure to COVID-19 through site visits to long-term care homes, childcare centres, other congregate settings during non-outbreak and outbreak occurrences. During these site visits and when providing clinical care and services, SMDHU Staff regularly work with clients and colleagues who are at increased risk of infection and at increased risk of severe complications from COVID-19. For example, young children at breastfeeding clinics cannot be immunized at this time and remain vulnerable to infection, while older adults in long-term care homes have experienced the highest case fatality rates to COVID-19.

#### *SMDHU Staff are critical public health service providers.*

SMDHU Staff are essential to the public health system in Simcoe Muskoka and in the province of Ontario. SMDHU Staff lead case and contact investigations, manage institutional outbreaks, have led the mass vaccination campaign, and have been instrumental in minimizing the impacts of COVID-19 on the population. Any loss of services due to Staff illness potentially compromises the SMDHU's capacity to protect the population.

*SMDHU Staff are colleagues to individuals at increased risk of complications or death from COVID-19 infection.*

The comorbidities which place individuals at increased risk of hospitalization or death from COVID-19 infection are common chronic diseases and are likely prevalent among SMDHU Staff. The nature of SMDHU work and office environment – working in close proximity to others, sharing meeting rooms, desks, phones, computers and other equipment - allows for ease of transmission and thus puts vulnerable, high-risk Staff at increased risk of acquiring COVID-19 and its complications.

*SMDHU has a responsibility to the health and safety of its Staff and the Simcoe Muskoka community at large.*

Under the Ontario Occupational Health and Safety Act, SMDHU has a responsibility to take all precautions reasonable in the circumstances to protect the health of its employees. Furthermore, SMDHU has a responsibility under the Ontario Public Health Standards to promote and protect the health of its residents, and to be prepared to manage public health emergencies in its jurisdiction. These actions require a healthy workforce.

*SMDHU can demonstrate community leadership.*

As strong advocates and purveyors of preventive interventions, it is important that the SMDHU show leadership in the area of COVID-19 vaccination.

### **COVID-19 Vaccination**

COVID-19 vaccination is an effective and safe intervention which dramatically decreases the risk of hospitalization or death should an individual become exposed to the virus. Estimates from around the world place vaccine effectiveness against severe outcomes between 70 and 90% for Pfizer, Moderna, and AstraZeneca vaccines (Public Health Ontario, 2021). In Ontario, the vaccine effectiveness of two doses of an mRNA vaccine against severe outcomes was 98% (Chung et al., 2021). There is also some evidence that vaccination prevents secondary transmission in cases of infection following vaccination. Researchers in England reported fewer infections in household contacts of immunized cases compared to household contacts of unimmunized cases (Harris et al., 2021).

COVID-19 vaccinations are safe. With rigorous approval processes, and ongoing surveillance of adverse events, COVID-19 vaccinations are held to the highest standard. The Public Health Agency of Canada is reporting, as of July 9, 2021, adverse events following vaccination reported in 0.023% of doses, with only 0.005% of doses considered serious events (Public Health Agency of Canada, 2021c).

### **Testing and Masking**

COVID-19 has been difficult to control due to its highly infectious nature, as well as the fact that it may be transmitted by asymptomatic individuals. For this reason, in the absence of vaccination, we have required a combination of public health measures, such as physical distancing, masking, and testing to ensure asymptomatic individuals do not unknowingly transmit COVID-19. Frequent testing, including rapid antigen testing, is used in Ontario to identify individuals infected with COVID-19 that would otherwise not be detected through other mechanisms.

### **Simcoe Muskoka District Health Unit commits to:**

1. Sharing trustworthy information about COVID-19 vaccination with all Staff, including information about COVID-19 vaccination safety and vaccination locations.
2. Encouraging vaccination through the use of vaccine champions.

## **Assumptions**

This policy is consistent with advice from the Public Health Agency of Canada recommending masks and physical distancing by unvaccinated people when indoors with people from multiple households (Public Health Agency of Canada, 2021b). The policy makes the following assumptions:

- The COVID-19 vaccine effectiveness will be maintained even as new variants develop.
- COVID-19 is likely to become endemic. Should the epidemiology of COVID-19 change, this policy is subject to revision at the discretion of the Medical Officer of Health.

Vaccination is a safe and effective intervention against COVID-19. By making vaccination an expectation for all employees, SMDHU helps protect its employees, their colleagues, and Simcoe Muskoka residents.

## **Purpose**

To outline the commitments SMDHU makes to encouraging and facilitating COVID-19 vaccination.

To establish expectations for SMDHU Staff to receive COVID-19 vaccination in order to:

- Protect clients who receive direct services from SMDHU Staff.
- Protect SMDHU Staff members and their SMDHU work colleagues (including some of those who, unknown to colleagues, may be at high risk of serious complications or death from COVID-19 infection).
- Protect the ability of the SMDHU to provide critical public health and emergency services.
- Provide leadership on this preventive measure to the community and our community partners.

## **Policy Definitions and Interpretation**

For the purposes of this policy, the following definitions apply:

**Staff:** all individuals employed by or working for the SMDHU, including volunteers, students, contracted personnel (working on a full day basis for > 10 consecutive days), and members of the Board of Health.

**Supervisor:** the person to whom a Staff member directly reports.

**Full vaccination:** having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization (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.

## **Policy**

SMDHU's goal is 100% Staff full vaccination rate. To reach this goal all Staff as defined herein, including newly hired employees, must be fully vaccinated (see above definition of full

vaccination), unless an exception under this policy applies. The only such exceptions are a valid medical exemption or other valid accommodation entitlement under the Ontario Human Rights Code. Those who do not comply with this policy will be subject to progressive steps beyond mandatory education and testing such as, but not limited to, unpaid leaves of absence and/or termination for cause, as may be determined in SMDHU's sole discretion. Mandatory vaccination is required for all Staff and new employees to support this goal.

*SMDHU requires all Staff to do one of the following:*

1. Provide written proof of full vaccination against COVID-19; OR
2. Provide written proof of a medical reason, provided by a physician or nurse practitioner 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; OR
3. Submit documentation (i) confirming declination of vaccination and (ii) providing any reasons for declining vaccination other than medical reasons, notably any reasons that may support a valid accommodation request under the Ontario Human Rights Code.

All Staff must submit the required documentation to Human Resources as per the timeline requirements communicated by SMDHU.

SMDHU reserves the right to determine whether submitted documentation is acceptable for the purposes of this policy.

### ***Procedures***

*Documentation of vaccination status by all existing Staff:*

- Each existing Staff member is required to provide Human Resources with written proof of their COVID-19 vaccination status, or written reasons for declining vaccination (including medical exemption), by the deadline that will be communicated through Human Resources.
- Staff who have not provided this information to Human Resources by the deadline will receive a reminder email from their applicable VP explaining the SMDHU's expectations and this policy, which reminder will be copied to their direct supervisor for follow up.

*Procedures relating to new and returning Staff:*

- All job postings will (i) state that full vaccination is an essential requirement of the job (ii) will provide a definition of full vaccination and will (iii) state that SMDHU is an equal opportunity employer, and that the possibility of accommodation will be considered during the hiring process as required.
- During all hiring interviews, applicants will be informed briefly about this policy by the Selection Committee Chair and asked whether they can comply with the requirement of full vaccination or if they will require accommodation under this policy. If accommodation needs are raised in the interview process, these needs will be discussed in that process so that the SMDHU can gain a better understanding of

them. Candidates who cannot comply with full vaccination and who do not claim a valid accommodation need will be given no further consideration in the hiring process.

- Qualified candidates who are selected to receive a job offer will receive such job offers conditional on (i) proof of full vaccination or (ii) proof of need for accommodation under this policy and the SMDHU's determination that the requested accommodation can be provided without undue hardship. A copy of this policy will be included in all letters of hire to new Staff for acknowledgement and sign off.
- Staff who have been off work and will now be returning to work will be allowed to return to work once they have met and satisfied the requirements and obligations within this policy. Any and all accommodation requests must be addressed as outlined within this policy before Staff may return to work.

#### *Educational Session concerning COVID-19 vaccines*

The SMDHU may make available an educational session for unvaccinated Staff without a bona fide medical exemption that will address (i) how COVID-19 vaccines work (ii) vaccine safety related to the development of the COVID-19 vaccines (iii) the benefits of vaccination against COVID-19 (iv) risks of not being vaccinated against COVID-19 and (v) possible side effects of COVID-19 vaccination.

#### *Procedures relating to non-vaccinated employees:*

- For Staff who can prove valid medical or other Ontario Human Rights Code grounds for exemption from having to prove full vaccination, the SMDHU will comply with its obligations to consider reasonable accommodation if possible and, if required, grant such accommodation. Each such case will be assessed and dealt with on its own merits. Without limiting the generality of this paragraph, accommodation terms may include the following:
  - When in shared workspaces, using appropriate COVID-19 source control and personal protective equipment as required by SMDHU, potentially beyond the period of time for which this is also required of vaccinated Staff, including a mask when within 2 metres of other persons.
  - For Staff who work in person with clients, in clinic, or in community spaces, using appropriate COVID-19 source control and personal protective equipment at work as required by SMDHU, potentially beyond the period of time for which this is also required of vaccinated Staff, including a mask and eye protection.
- For the protection of SMDHU Staff, clients and members of the community we serve, for Staff who fail to prove full vaccination under this policy, or who fail to show valid medical or other Ontario Human Rights Code grounds for exemption from having to prove full vaccination, the SMDHU will determine an appropriate response on a case-by-case basis in accordance with the policy statement contained herein of 100% compliance and which is consistent with the purpose and terms of this policy and applicable legislation including the Occupational Health and Safety Act.
- SMDHU employees shall comply with provincial directives and facility policies to provide to such facilities proof of vaccination or medical exemption as requested.

- In all cases, non-vaccinated Staff who work in the office, in clinic, or in the community will be required to submit to antigen point of care testing for COVID-19 and demonstrate a negative result at intervals to be determined by the Medical Officer of Health, but at a minimum twice every seven calendar days. The negative test result will need to be verified by SMDHU in a manner that it so determines that allows the SMDHU to confirm the result at its discretion. For more details, contact Human Resources.

### ***Privacy***

Any personal information received pursuant to this policy and relating to an employee's vaccination status will:

- be collected only as necessary and reasonable to achieve the purposes of this policy, including protecting the health and safety of employees and clients, limiting the spread of COVID-19 in the workplace and compliance with applicable laws;
- be used for the purpose of protecting the health and safety of workers and third parties in the workplace, including, for example, effectively responding in the event of a COVID-19 outbreak;
- be disclosed only to representatives designated by SMDHU to enable them to carry out the objectives of this policy and to protect the health and safety of the employee concerned, co-workers, visitors, suppliers, or the general public, if any; and
- not be disclosed to any third party unless SMDHU receives employee consent or as otherwise required by law.

Personal information received under this policy will be treated as confidential and will be stored and retained by SMDHU in accordance with its Personal Health Information Privacy Policy IM0101. Such personal information will be destroyed by SMDHU as soon as it is no longer of any use.

### ***Continuation of Health and Safety Matters***

Pursuant to public health guidelines, all employees, including those who have been vaccinated, must continue to comply with SMDHU's COVID-19 health and safety policies and guidelines, except as provided for in this policy or until advised otherwise.

### ***Revisions***

This policy will be reviewed by the Medical Officer of Health annually or when new information on COVID-19 vaccination or epidemiology changes significantly, to ensure that it is up to date.

### ***Related Forms***

[HS0122\(F1\) Statement of Medical Exception for COVID-19 Immunization](#)

[HS0122 \(F2\) Refusal of COVID-19 Immunization](#)

## References

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**Final Approval Signature:** \_\_\_\_\_