



COVID-19 Mandatory Vaccination

FAQ for Staff and Physicians

What is Directive #6 and what are the requirements under this new directive?

The Chief Medical Officer of Health's (CMOH) Directive #6 applies to all public hospitals within the meaning of the Public Hospitals Act, 1990, among others.

Under Directive #6, Covered Organizations are required to establish and implement a COVID-19 immunization policy for employees, staff, contractors, volunteers and students. Where an employee, staff, contractor, student or volunteer does not provide proof of being fully vaccinated against COVID-19 there is a requirement under Directive #6 for regular point of care rapid antigen testing.

Why did the CMOH issue this new Directive?

Achieving high immunization rates in Ontario's Covered Organizations through vaccination is part of a range of measures and actions that can help prevent and limit the spread of COVID-19 in these settings. Vaccination against COVID-19 helps reduce the number of new cases, and, most importantly can limit severe outcomes including hospitalizations and death due to COVID-19 in patients, employees, staff, contractors, volunteers, students and all others who may be present in the covered organizations.

A provincial vaccination policy promoting vaccine uptake among health care workers in the hospital sector aligns with the goals and overall provincial response to 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 (HHR) capacity
- Reducing the potential for outbreaks, potential disruptions in service and continuity of care

What is Pembroke Regional Hospital's Vaccination Policy?

Effective September 7th, 2021, PRH implemented a vaccination policy consistent with the requirements under Directive #6. In addition, following the lead of other hospitals and health service providers in the province and throughout our region, PRH has taken the direction one step further and, as part of a phased approach, we are implementing a mandatory vaccination policy effective **October 15th, 2021**.

How will PRH's COVID-19 Vaccination Policy be Phased in?

1. **On August 27th, 2021**, all staff and physicians were asked to declare their immunization status to the Occupational Health and Safety (OHS) department by choosing one of three options:
 - i. Providing proof of full vaccination (both doses)
 - ii. Providing proof of medical exemption



iii. Intent to engage in an education and testing program

2. **September 7th, 2021**, any staff member or physician who did not demonstrate proof of full vaccination, including staff and physicians who are partially vaccinated (received one dose), have a medical or approved human rights exemption, must:
- Complete routine antigen testing (at home) within 48 hours of the start of each shift.
 - Attest to completing antigen testing and receiving a negative result using the electronic screening application each shift.
 - Be prepared to provide proof of negative results and/ or random PCR testing on site through the OHS department

Staff and physicians who opted to participate in the education and testing program **and have not yet chosen to receive the COVID-19 vaccination**, will be required to self enroll in an eLearning module through the eLearning system. Details will be shared with each individual in this category.

Frequency of rapid testing= within 48 hours of coming on site

Education: will be provided via eLearning and communicated with staff via email

3. **October 15th, 2021**, all staff, physicians and volunteers are expected to be fully vaccinated against COVID-19 and have submitted proof to the OHS department. Exceptions will only be made for those with a valid and documented medical contraindication and approved human rights exemption.
- To be considered fully vaccinated, 14 days must have passed since receiving the second dose of vaccination.*

Who does the mandatory vaccination apply to at PRH?

The mandatory vaccination policy applies to all staff and physicians, students, contractors and volunteers attending on site at PRH.

What are the medical exemptions to COVID-19 Vaccine?

As per the Ministry of Health, there are very few medical exemptions to COVID-19 vaccination outlined in Directive #6.

These medical exemptions are:

- **Severe allergic reaction or anaphylaxis** following the first dose of COVID-19 vaccine or to any of its components **AND** have been assessed by an allergist/immunologist to review methods for possible (re) administration of a COVID-19 vaccine. Other types of allergies do not on their own constitute the grounds for a medical exemption



Note: if allergic reaction to the vaccine component, it can still be provided but with longer observation period of 30 minutes.

- **Delay of second dose** because of a diagnosed episode of **myocarditis/pericarditis** after the receipt of an initial dose of an mRNA vaccine.

Directive #6 from the Ministry of Health requires health care providers to indicate whether the exemption is permanent or time-limited.

What is a human rights exemption?

PRH will strictly adhere to the protected grounds defined in the Ontario Human Rights Code. Each of these exemptions will be managed through Occupational Health and/or Human Resources and will be reviewed on a case-by-case basis and require a valid medical contraindication or other reasonable consideration pursuant to the *Ontario Human Rights Code*.

A singular belief or preference to remain unvaccinated is not protected on the basis of creed under the Ontario Human Rights Code.

All requests for Human Rights exemption should be submitted to the human resources department.

What proof is required for a medical exemption and who should I submit this documentation to?

Acceptable written proof of a medical reason, provided by either a **physician or nurse practitioner** must set out that:

- I. The individual cannot be vaccinated against COVID-19 and provide the specific medical reason for the exception.
- II. The period of time that the medical reason is for, either permanent or time limited.

All requests for medical exemption must be submitted to the OHS department.

What resources are available to staff who need more information before making a decision?

You can email your questions to OccHealth@prh.email or speak with a member of the OHS team by calling extension 8200. Additional supports may be offered on a case by case basis.

Staff and physicians can self enroll in the "COVID-19 Vaccination Module: Making an Informed Decision" through the PRH eLearning system (once available on the eLearning system).

What is the testing process and how do I find out more details?

Staff, physicians and volunteers are required to pick up home test kits from:

OHS Department- Monday- Friday 0800-1600, or

Emergency Department Screening Station- afterhours, weekends and holidays



Staff and physicians who are unvaccinated or partially vaccinated are required to complete antigen testing at home **within** 48 hours prior to the start of each shift (up to three times / week for full time staff). The OHS department may request staff and physicians to complete random PCR testing on site for compliance and auditing purposes.

Staff and physicians will attest to completing the antigen test and receiving a negative result on their screening application.

What happens if I am called in for an extra shift and am required to complete antigen testing?

Rapid antigen testing must be completed **within** 48 hours prior to the start of a shift. It can be completed in as little as 20 minutes and just prior to entry into the workplace.

Do I have to assume the cost of the antigen testing kits?

The cost of testing kits is covered.

Will I be paid for time spent performing rapid antigen tests?

You will not be paid for the time spent completing your mandatory testing and it must be done outside your working hours.

Do I need to confirm the result of my test with my manager after each test?

You will need to attest to completing rapid antigen testing and receiving a negative result using the COVID screening App prior to entering work. OHS will have access to the information and perform random audits and will be required to show proof of your negative test result.

Will my manager/ supervisor know the reason that I am not vaccinated?

No. PRH's OHS Department will collect and maintain in the individual's confidential file documentation of COVID-19 vaccination status, including vaccine refusal, information pertaining to medical contraindication, and/or confirmation with respect to any other exemption granted.

Supporting documentation related to any non-medical request for an exemption will be maintained by Human Resources.

This information will be used internally by PRH for the purpose of administration of the policy, outbreak planning and management, workforce management, scheduling and as otherwise permitted or required by law. It will be held in confidence, securely stored and shared only as required to achieve the purposes.



Where can I find more information about the COVID-19 Immunization Education Module?

An education module has been developed in accordance with the requirements under Directive #6. The education module is intended to support staff and physicians in making an informed decision about the COVID-19 vaccine. Staff and physicians, who are unvaccinated as of September 7th, 2021, without a valid medical exemption, will be required to complete the mandatory eLearning module. Staff and physicians who are required to complete the education will receive a direct email to their PRH email account with directions on how to self enroll and the deadline for completion. Departmental managers will be required to audit for completion and follow up if the training is overdue.

What will happen if I am not fully vaccinated on October 15th, 2021?

Effective October 15, 2021, all PRH Staff will be required to be fully vaccinated (14 days must have elapsed after completion of the series i.e. 2nd vaccine received October 1st), unless they have a valid medical contraindication or other reasonable consideration pursuant to the Ontario *Human Rights Code*. Failure to comply with this requirement, unless they have a valid medical contraindication or other reasonable consideration pursuant to the Ontario *Human Rights Code*, may result in administrative action, including but not limited to an unpaid leave of absence, and/or discipline up to and including termination of employment for cause.

It is essential that all Staff follow this Policy in order to protect the health and safety of the community receiving care at PRH, and the health and safety of their colleagues.

We will work with each staff member on an individual basis to assist with this process.

Who do I contact if I change my mind and would like to get vaccinated?

You can book an appointment online to get vaccinated <https://covid-19.ontario.ca/book-vaccine/> and inform the OHS department at OccHealth@prh.email

How can I obtain proof of my vaccination if I was vaccinated in Ontario?

You may obtain a receipt of your vaccination through the Ontario Health portal by clicking the link below. Please note that the link does not work with Microsoft Internet Explorer and you must use an alternate browser such as Google Chrome. Just copy the following link:

<https://covid19.ontariohealth.ca/>

If I have already had COVID-19 and recovered, do I still need to get vaccinated?

Yes, you should be vaccinated regardless of whether you already had COVID-19 because research has not yet shown how long you are protected from getting COVID-19 again after you recover. Vaccination helps protect you even if you've already had COVID-19.



On top of that, if you live with people who are at higher risk of severe infection or may not develop a strong antibody level after vaccination, getting your own COVID-19 vaccination may make it less likely that you will transmit the virus to them.

What happens if I do not feel well or have been exposed to COVID-19?

You must continue to follow routine screening processes. Staff and physicians must notify the Occupational Health and Safety Department/ Delegate (ext 8200) if they are unwell or have been exposed to COVID-19. Rapid antigen tests are intended for asymptomatic surveillance testing only. Staff and physicians symptomatic of COVID-19 must receive a PCR test through the Occupational Health and Safety Department.

I am fully vaccinated and have submitted proof of both vaccines to the OHS department. Do I still need to complete the screening App before entry into the workplace?

Yes. Regardless of vaccination status, all staff, physicians, volunteers, students and contractors must continue to complete COVID-19 self assessment screening through the electronic App prior to entry into the workplace. Regardless of vaccination status, everyone must continue to follow Infection Prevention and Control protocols, including the use of PPE.

Will unvaccinated staff and physicians be re-deployed to non-clinical areas?

No. Effective October 15th, 2021, PRH expects all staff, physicians, volunteers, students and contractors to be fully vaccinated. Anyone who has a valid medical or approved human rights exemption after this date will be required to continue to perform rapid antigen testing at home within 48 hours prior to entering the workplace. All staff, physicians, volunteers, students and contractors are expected to continue to follow PPE protocols according to PRH policy and their area of work.

Why is PRH making COVID-19 Vaccination Mandatory?

PRH, like many other hospitals in our region and in Ontario, is following the provincial government directive and implementing a COVID-19 vaccination policy for everyone working in the hospital environment. The health and safety of our staff, physicians, students, volunteers, contractors and community is top priority. As we head into fall, it is even more important to have everybody vaccinated so we can enhance our collective immunization against COVID-19 and the variants that are emerging. Decisions like this will ultimately help us protect our patients, health human resources and get us through the COVID-19 pandemic.

Why does PRH's vaccination policy not apply to visitors/ essential caregivers?

While visitors are not covered under Directive #6, the same underlying concerns about ensuring a safe environment apply. For those visiting the hospital, there is a clear and meaningful safety benefit to requiring vaccination. To this end, the hospitals within the Champlain region are currently reviewing



vaccination requirements for visitors and essential caregivers to establish a standard approach and policy within our region.

All visitors and essential caregivers are still required to follow universal masking protocols and additional PPE requirements as indicated, regardless of vaccination status. When staff notices visitors not adhering to our current policies they are encouraged to remind these visitors of our masking and distancing rules. If non-compliance continues, involve your manager or clinical resource for support. We will increase public communication around masking guidelines for visitors.