



## POLICY AND PROCEDURE MANUAL

**Section:** Administrative

**POLICY:** AD 14

**Policy Date:** November 2021  
September 2021; October 2021

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### COVID-19 Vaccination Policy

#### **PREAMBLE**

On August 30, 2021, MCCSS directed that Contact Brant is required to comply with the *Letters of Instruction* issued by the Office of the Chief Medical Officer of Health. This Instruction falls under the authority of subsection 2(2.1) of Schedule 1 of O. Reg. 364/20: *Rules for Areas at Step 3 and at the Roadmap Exit Step under the Reopening Ontario (A Flexible Response to COVID-19) Act, 2020 (ROA) ("Instructions")*. This policy is based on the expectations of these Instructions.

Contact Brant is a "Covered Organization" in the Vaccination Policy Requirements as we are a Transfer Payment recipient funded under CYFSA that provides services with respect to children and youth with special needs, Autism, Complex Special Needs funded services, Coordinated Service Planning, and FASD worker services. A "Required Individual" is an employee, contractor, volunteer, or student of our agency.

Additionally, we are responsible for "Third Parties" that we have entered into a contract with to provide services to children and youth with special needs such as through Complex Special Needs, and Urgent Response Services funding. Contact Brant is required to share the Ministry policy information with all third party contracts, and third parties are required to complete the reporting requirements.

Vaccination against COVID-19 helps reduce the number of new cases, and, most importantly, severe outcomes including hospitalizations and death due to COVID-19. Achieving high immunization rates with service providers who regularly provide essential close contact and direct interventions will support achieving protection for those we serve.

Visitor and other individuals not captured in the Letter of Instruction are NOT in the scope for these requirements. Public health measures are in place to protect residents, service recipients, and staff from COVID-19 transmission - these include the safety measures and expectations that we have outlined in the Contact Brant *Pandemic Safety Plan*.

Note: The following are NOT in the scope of these requirements: Services purchased with funding received through Passport, Special Services at Home, Assistance for Children with Severe Disabilities, Enhanced Respite for Medically Fragile/Technology Dependent Children, and OAP Interim One-Time Funding

Rapid Antigen Screening Tests facilitate the identification of an individual infected with COVID-19 that regular screening protocols (e.g., symptom screening) might otherwise miss. It may therefore help prevent asymptomatic individuals from

unknowingly spreading COVID-19. Frequent screening with rapid antigen tests increases the chances of early identification of cases in otherwise asymptomatic individuals. Antigen testing increases the sense of protection and security in the workplace. At this time, the Ministry is expecting Contact Brant to ensure regular Rapid Antigen Screening Tests for all individuals who do not provide proof of full COVID-19 vaccination.

Although it is an individual's right to make the decision about whether to be vaccinated or not, the Chief Medical Officer of Health strongly encourages that everyone get vaccinated.

As of September 2021, 100% of our staff are fully vaccinated!

## **POLICY**

**Contact Brant requires employees, contractors, volunteers and students to provide one of the following:**

- i. Proof of full vaccination against COVID-19, or**
- ii. Written proof of a medical reason for not being fully vaccinated against COVID-19, or**
- iii. Documentation of completing an education session about the benefits of COVID-19 vaccinations prior to declining vaccination.**

**Those employees not fully vaccinated will be required to complete regular antigen point of care testing for COVID-19 and demonstrate each test result.**

## **PROCEDURES**

1. Contact Brant employees are required to provide one of the following to the CEO:
  - 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; or
  - c. Written Attestation of completing the agency-approved educational session about the benefits of COVID-19 vaccination prior to declining vaccination for any reason other than a medical reason.

"Fully vaccinated" is defined as at least 14 days have passed since receiving the second dose of the COVID-19 vaccine

Refer to Appendix A for further information on proof of vaccination and the written medical reason.

### **COVID-19 Rapid Antigen Tests**

2. Where an employee does not provide proof of being fully vaccinated against COVID-19 but instead relies upon the medical reason described in 1(b), or declines vaccination following the educational session described in 1(c), the individual is required to submit to regular antigen point of care testing for COVID-19 and provide the test results to the CEO or alternate:

- a. Antigen testing will occur at a minimum three times per week, as established by the CEO with each employee based on work interface with individuals. The rapid antigen testing will usually be completed on Mondays, Wednesdays and Fridays.
- b. Contact Brant will provide each unvaccinated and partially vaccinated staff with a COVID-19 Rapid Test kit. Instructions for using the kit must be reviewed prior to the distribution of these kits.
  - See Appendix B for training and instructions on the self-administration of the COVID-19 Rapid Test.
  - Rapid testing kits are not to be shared or distributed and are not for personal use. Unused portions of rapid testing kits are to be returned to Contact Brant.
- c. Staff will self-administer the rapid tests outside of the workplace and prior to the start of the employee's workday.
  - Staff are permitted to obtain rapid antigen testing administered elsewhere if it meets the requirements of this policy.
- d. The employee is responsible for the self-collection of specimens, proper handling of specimens, documentation and reporting of results, required actions depending upon results, and appropriate disposal of specimens, kits and other contaminated materials following the authorized protocols per the Rapid Antigen Test manufacturer's instructions, and directives per Ontario Health and their local Public Health Unit.
  - The employee will provide photo verification of each test result to the CEO or alternate prior to the start of their workday, with the date of the test clearly identifiable.
  - Unvaccinated and partially vaccinated staff who do not provide proof of a test before the start of their workday shall not be permitted to work and will not be paid until they provide proof of a test.
- e. Where a staff receives a positive rapid antigen test result, the staff must immediately notify the CEO or alternate, and self-isolate. The staff must undergo laboratory-based COVID-19 testing as soon as possible and in any event within the next 24 hours.
  - If a staff's confirmatory test is positive, they will need to continue self-isolating and follow directions from their local public health unit. Staff with a confirmed positive result must immediately advise the CEO or alternate.

#### COVID-19 Vaccination Education

3. For employees declining vaccination for any reason other than a medical reason, the CEO or designate will provide the individual with the approved agency educational program and required *Attestation of Completion of the COVID-19*

*Vaccination Education* form, which must be submitted to the CEO. Contact Brant's educational program is intended to help individuals understand:

- 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.
4. As this policy is directed by provincial Instruction, non-compliance with this policy by employees will result in disciplinary action up to and including termination.
  5. Offers of employment, as well as student and volunteer placements, will be conditional upon the individual reviewing the agency's COVID-19 Vaccination Policy and providing one of the documentation required in Section 1 of this Policy. If not fully vaccinated they must agree that they will submit to regular antigen testing and provide their results to the agency.

#### Contracted Services

6. Contact Brant may enter into contracts with "Third Parties" for the provision of direct services to children and youth with special needs. Third Parties may include other Ministry-funded transfer payment agencies or private providers not licensed by the Ministry.
  - a. Contact Brant will provide Third Party organizations with the Ministry Guidelines, which outline the expectation that they are a "Covered Organization" and as such must meet the requirements of the COVID-19 Vaccination Policy.
  - b. Third Parties must provide their COVID-19 Vaccination Policy to the CEO. The Policy must meet the Ministry requirements to be considered by the agency as a contractor.
  - c. Third Parties also are required to complete the reporting requirements. Contact Brant will provide the Ministry reporting link to the Third Party organizations to complete the reporting directly.
7. Contact Brant operational contractors who regularly enter the Contact Brant worksites (including technology and phone providers) must acknowledge that they understand the Ministry directives and the requirements of a COVID-19 Vaccination Policy.
  - a. Contact Brant will provide operational contractors with the Ministry Guidelines.
  - b. These contractors will be requested to share their COVID-19 Vaccination Policy with Contact Brant if they have one, and submit an Attestation that their organization has implemented the standards with their employees who regularly access the Contact Brant building. The Policy or the Attestation must meet the Ministry requirements (collecting proof of full vaccination against COVID-19 or documented medical reason, or providing an education program for those not fully vaccinated) to be considered by the agency as a contractor.

- Contact Brant requires that these contractors will ensure a minimum of twice weekly rapid antigen testing of their unvaccinated and partially vaccinated employees.
- c. If the Ministry requires Contact Brant to include these contractors in their reporting, these contractors will be required to collect, maintain, and disclose the required statistical, non-identifiable information to Contact Brant.

#### Board of Directors

8. Although the Board is not covered by the provincial expectations, they have identified that they recognize the importance of this COVID-19 Vaccination Policy and will be included in this policy.
  - a. Directors of the Board will submit one of the following to the Executive Assistant:
    - i. Proof of full vaccination against COVID-19; or
    - ii. Written proof of a medical reason for not being fully vaccinated against COVID-19; or
    - iii. *Attestation of Completion of the COVID-19 Vaccination Education* following completion of the agency-approved education session about the benefits of COVID-19 vaccinations prior to declining vaccination.
  - b. As the Board members do not regularly enter the Contact Brant building, Directors will not complete the antigen testing. However, they need to follow the safety measures and expectations outlined in the Contact Brant *Pandemic Safety Plan* including but not limited to completion of the COVID-19 Screening prior to entering the building, physical distancing, and wearing a face mask.

#### All Other Individuals

9. All visitors and other individuals not captured in the *Letter of Instruction* are not in the scope for these requirements.

For these individuals entering the building, or face to face meetings that occur outside of the building, staff will follow the safety measures and expectations outlined in the Contact Brant *Pandemic Safety Plan*. This will include (i) Elimination and Substitution controls such as limiting numbers; (ii) Engineering and awareness controls such as physical distancing; (iii) Administrative control measures including completing the COVID-19 Screening for staff and others; and (iv) Personal Protective Equipment.

#### Daily COVID-19 Screening Still Applies

10. All staff must continue to undergo standard COVID screening in order to be permitted into the workplace. This applies regardless of the results of a rapid antigen test, and for fully vaccinated staff.

Staff who are symptomatic or otherwise fail the standard COVID-19 screening, will be prohibited from entering the workplace as outlined in Contact Brant's *Pandemic Safety Plan*.

#### Ministry Reporting

11. Contact Brant will collect, maintain, and disclose required statistical, non-identifiable information to the Ministry/Ministries related to this policy:

- a. The number of required individuals that provided proof of being fully vaccinated against COVID-19
- b. The number of required individuals that provided a documented medical reason for not being fully vaccinated against COVID-19
- c. The number of required individuals that declined vaccination after completing an educational session about the benefits of COVID-19 vaccination
- d. The total number of the organization's required individuals to whom this instruction applies.

Retention of Records

12. The Vaccination status records will only be used for the purposes of this policy and individual records will not be shared without consent.
  - a. Employee vaccination status will be stored in their confidential personnel record maintained securely by the Chief Executive Officer.
  - b. Board and contractor information will be stored securely in their associated confidential records maintained by the Executive Assistant.
  - c. When the Ministry no longer requires this information to be collected and reported, the Vaccination record in each file will be securely destroyed, as per the Retention of Records Policy.

## Proof of Full Vaccination against COVID-19

After vaccination, individuals with an Ontario photo health card can log in to the provincial portal to download or print an electronic COVID-19 vaccine receipt (PDF) for each dose received. The physical/hard copy receipt and email version of the receipt will resemble the following:

**Ontario** 

**Ministry of Health**  
**Ministère de la Santé**

Name/Nom: [REDACTED]  
Health Card Number/Numéro de la carte Santé: [REDACTED]  
Date of Birth/Date de naissance: [REDACTED]  
Date/Date: 2021-05-16, 3:43 p.m.  
Agent/Agent: COVID-19 mRNA  
Product Name/Nom du produit: PFIZER-BIONTECH COVID-19 VACCINE mRNA  
Diluent Product: PFIZER Diluent 0.9% Sodium Chloride  
Lot/Lot: [REDACTED]  
Dosage/Dosage: 0.3ml  
Route/Voie: Intramuscular / intramusculaire  
Site/Site: Left deltoid / deltoïde gauche  
You have received 1 valid dose(s) / Vous avez reçu 1 dose(s) valide(s)  
Vaccine Administered By/Vaccin Administré par: [REDACTED]  
Registered Practical Nurse  
Authorized Organization/Organisme agréé: [REDACTED]

Note: Only valid doses are counted / Remarque: Seules les doses valides sont comptées.

Please remain on the premises for the next 15 minutes for observation. You are free to leave the vaccination clinic at 1:58 PM / Veuillez rester sur place pendant les 15 prochaines minutes aux fins d'observation. Vous pouvez quitter la séance de vaccination à 1:58 PM.

Individuals who have a red and white health card can call the *Provincial Vaccine Booking Line* at 1-833-943-3900. The call center agent can email a copy of their receipt.

Otherwise, contact the health unit in the region where you received your vaccinations and they can provide a copy of their receipt.

## Proof of Medical Reason for Not Being Vaccinated

Written proof of a documented medical reason for not being fully vaccinated against COVID-19 must be provided by either a physician or a registered nurse in the extended class (see Extended Class (cno.org)). Referral and consultation support for physicians and registered nurses in the extended class is available through Ontario's eConsult Service and OTN Hub.

In some instances, the medical reason for the person not being vaccinated may be time-limited. The Ministry Instructions require that the note from the physician/nurse practitioner specifies the effective time-period for the medical reason. If time-limited, the note should indicate how long it is expected to last.

## COVID-19 Rapid Test Training

Rapid antigen testing is used to detect and respond to COVID-19, a highly infectious and deadly communicable disease. Contact Brant will follow Provincial Guidance regarding rapid antigen testing as a reasonable and necessary measure to prevent, respond to, and alleviate the outbreak of COVID-19 and the associated risk to our staff and to the people that we support, in addition to the public health safety measures we practice. This Policy is also adopted to comply with our obligations under the *Occupational Health and Safety Act* to take every reasonable precaution in the circumstances to protect a worker and to comply with our obligation under applicable emergency orders, as well as government mandated rapid antigen testing for unvaccinated and partially vaccinated staff as well as the recommendations and directions of our local Public Health Unit.

Rapid antigen COVID-19 tests provide quick detection of COVID-19 (in as little as 15 minutes) with less sensitivity than regular laboratory-based COVID-19 tests. There is a higher rate of false negatives and false positives. A false negative is a result that incorrectly shows that a person does not have COVID-19, while a false positive is a result that inaccurately shows that a person does have COVID-19. Despite this, these tests are accurate enough that they can catch many asymptomatic cases of COVID-19 early.

These rapid tests are therefore used for screening to identify people who may have COVID-19 but not for diagnosis of COVID-19. Those who test positive must undergo more accurate laboratory testing to confirm that they do or do not have it. The Province requires that any positive result in a rapid test means an individual must undergo a confirmatory laboratory test within 24 hours.

**Note:** In accordance with directives from Public Health, in the event of an outbreak in the staff's program location, all staff regardless of vaccination status will be required to participate in Rapid Antigen Testing.

This Policy relates to unvaccinated or partially vaccinated staff who must self-test as per policy.

Prior to self-administering a Panbio™ COVID-19 Rapid test, staff are to complete the agency's approved training and sign the *Attestation of Completion of the COVID-19 Vaccination Education*.