

## COVID-19 Vaccination

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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. During the course of the pandemic Ontario experienced over 16,500 deaths. Widespread measures like stay-at-home orders, closures of public spaces, physical distancing, and universal masking were necessary to prevent infections, prevent deaths, and protect the healthcare system's capacity to treat individuals who become ill. Vaccination has been and continues to be an important intervention to prevent COVID-19 morbidity and mortality in Canada since its inception.

Although the World Health Organization has declared COVID-19 no longer a public health emergency as of May 5, 2023, and there has been a substantial reduction in mortality from COVID-19 in Ontario, COVID-19 continues to result in a significant number of cases, outbreaks, hospitalizations and deaths, exceeding those of influenza and other respiratory viruses. For this reason, COVID-19 vaccination remains an important public health measure and occupational health measure in health care.

### 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 (NACI) and the Ontario Ministry of Health 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.<sup>(1,2,3)</sup> SMDHU Staff are at increased risk of exposure through the provision of direct client care settings. 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. Any loss of services due to Staff illness potentially compromises 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*<sup>(4)</sup>, SMDHU has a responsibility to take all precautions reasonable in the circumstances to protect the health of its workers. Furthermore, SMDHU has a responsibility under the Ontario Public Health Standards<sup>(5)</sup> 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 through the COVID-19 vaccination policy.*

As strong advocates and purveyors of preventive interventions, it is important that 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<sup>(6)</sup>. Periodic vaccination, similar to other vaccination such as influenza, is necessary to maintain adequate protection against COVID-19 for individuals and the community.

Over time, protection from the COVID-19 vaccine can decrease due to waning immunity, requiring periodic vaccination. Vaccination may prevent secondary transmission in case of infection following vaccination. Researchers in England reported fewer infections in household contacts of immunized cases compared to household contacts of unimmunized cases.<sup>(7)</sup>

COVID-19 vaccinations are safe. With rigorous approval processes, and ongoing surveillance of adverse events, COVID-19 vaccinations are held to the highest standard. Serious side effects are rare. The Public Health Agency of Canada is reporting, as of April 12, 2024, of the 58,712 individual reports of side effects (0.056% of all doses administered), 11,702 were considered serious (0.011% of all doses administered).<sup>(6)</sup>

### ***Additional Public Health Measures***

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. A [multilayer approach](#) involving masking, physical distancing, improved indoor ventilation, hand hygiene, testing when symptomatic for high risk persons and in specific settings (e.g. for antiviral treatment, protect vulnerable persons around the ill person), and staying home when ill provide the most optimal protection for the community. These measures are particularly important in the context of an indoor environment, where ventilation, masking, and distancing are less effective in confined spaces. However, vaccination remains the most effective protection against COVID-19, and unlike the other layers of protection, it only has to be performed periodically.

SMDHU commits to sharing trustworthy information about COVID-19 vaccination with all Staff, including information about COVID-19 vaccination safety and vaccination locations.<sup>(8)</sup>

### ***Assumptions***

The policy makes the following assumptions, which are based on current scientific consensus:

- COVID-19 vaccines will continue to be effective but will require periodic vaccinations as per current and future provincial recommendations.
- COVID-19 is likely to be in circulation and surge in waves for the next number of years.
- 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 families, and Simcoe Muskoka residents.

Should the above assumptions and/or the epidemiology of COVID-19 change, this policy is subject to revision.

### ***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 partner.

### ***Legislative Authority***

Ontario Human Rights Code, 1990

Ontario Occupational Health and Safety Act, 1990

### ***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.

**Up to Date:** Vaccination status is current as determined by SMDHU based on recommendations for COVID-19 vaccine by the Ontario Ministry of Health.

**Note:** For those who may be immunocompromised as defined by the Ministry of Health guidance, it is the Staff member's responsibility to self-identify as such and to receive the recommended number of doses.

### ***Policy***

All staff are required to receive COVID-19 vaccinations, subject to the exceptions noted below. The requirements for COVID-19 vaccination for SMDHU employees will be adjusted and communicated at a minimum annually based on federal/provincial guidelines. To reach this goal all Staff as defined herein are required to report their vaccination status by November 30<sup>th</sup> annually when the COVID-19 activity level is designated as high or very high as per the [weekly respiratory surveillance update](#), all Staff will be required to comply with additional infection prevention and control measures as indicated below as applicable depending on the Staff member's position.

*Specifically, SMDHU requires all Staff to submit one of the following (each, a "Written Documentation"):*

1. Provide written documentation to Human Resources of vaccination against COVID-19 as per the most up to date [Ontario recommendations](#). At their discretion, a Staff member may redact any personal information on their written proof aside from the Staff member's name, the number and name of vaccination doses received by the Staff member, and the date(s) of the vaccination(s); OR
2. Complete and submit [HS0122 \(F1\) Statement of Medical Exception for COVID-19 Immunization](#) which is to be completed by a physician or nurse practitioner that sets out:
  - a. that there a medical reason for not being vaccinated against COVID-19; AND
  - b. the effective time-period for the medical reason (This statement does not need to be submitted annually for those with permanent contraindications); OR

3. Complete and submit [HS0122 \(F2\) Declination/Refusal of COVID-19 Immunization](#) because you have been infected with COVID-19 in the previous 6 months as confirmed by a COVID-19 test; OR
4. Submit documentation
  - a. confirming declination of vaccination; AND
  - b. providing valid acceptable reasons for declining vaccination other than medical reasons, that will support a valid accommodation request under the Ontario Human Rights Code<sup>(9)</sup>; OR
5. Staff who have made a personal decision to not get vaccinated unrelated to medical contraindications or reasons under the Ontario Human Rights code will complete [HS0122 \(F2\) Declination/Refusal of COVID-19 Immunization](#) documenting their decision and forward their documentation to Human Resources.

### **Procedures**

#### ***Documentation of vaccination status by all existing Staff:***

- Staff are required to submit one of the above acceptable forms of Written Documentation to Human Resources annually by November 30 and not earlier than 30 calendar days prior to the deadline. SMDHU reserves the right to determine whether submitted Written Documentation is acceptable for the purposes of this policy.
- Staff who have not provided this information to Human Resources by the applicable deadline will receive a reminder email from their applicable VP explaining SMDHU's expectations and this policy, which reminder will be copied to their Supervisor for follow up.

#### ***Procedures relating to new and returning Staff:***

1. During the employment interview, applicants will be informed briefly about this policy by the Selection Committee Chair.
2. A copy of this policy will be included in all letters of hire to new staff and in all letters of reinstatement to returning staff.
3. This policy will be reviewed in detail by Human Resources during their orientation of each new staff.

***Procedures when [SMDHU COVID-19 Activity Level](#) is designated as high or very high relating to employees without current vaccination records (which includes employees who have declined vaccination):***

- SMDHU will consider reasonable accommodation if possible and, if required, may grant such accommodation. Each such case will be assessed and dealt with on its own merits depending on the nature of a Staff member's position and the potential to jeopardize the health and safety of others. 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 up-to-date vaccinated Staff, including a medical mask when in a room with 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 up-to-date vaccinated Staff, including a medical mask.
- Any accommodations granted to employees shall be temporary in nature and shall be granted without prejudice to SMDHU's right to revoke or otherwise end such accommodation measures in response to evolving epidemiological conditions or for any other reason whatsoever.
- Staff not up-to-date with COVID-19 vaccination who work in direct contact providing health care to clients for whom other work assignments cannot be identified may be excluded subject to the review by the A/MOH from the workplace for the duration of the declared high or very high risk COVID-19 activity as per the [Weekly Respiratory Virus](#) Update. The following options may be available during work exclusion:

Option A:

Vaccination and work exclusion for 14 consecutive days. In order to resume work, a waiting period of 14 consecutive days after vaccination would apply to allow sufficient time to develop immunity.

Option B:

Work at home, if determined to be feasible and appropriate by the staff member's supervisor with the concurrence of the VP. The Department VP will inform Human Resources of staff working from home.

Option C:

Exclusion from work, where the health unit will consider and may permit use of one or more of the time accommodation options listed below:

- Use of accumulated flex time
  - Use of accumulated compensating time
  - Use of vacation
  - Unpaid leave of absence
  - Paid leave of absence. However, this option is only available for those with a medical contraindication or Human Rights accommodation for receiving COVID-19 vaccination if work from home is not an option. The Department VP will inform Human Resources of staff not scheduled to work.
- SMDHU employees shall comply with provincial directives and facility policies to provide to such facilities proof of vaccination or medical exemption as requested.

***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 Staff, 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 Policies***

OP0110 Work from Home Policy

HR0709 Leave of Absence (unpaid)

HS0106 Influenza Immunization

IM0101 Personal Health Information Privacy Policy

### ***Related Forms***

[HS0122 \(F1\) COVID-19 Statement of Medical Exemption](#)

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

### ***Documentation Submission***

COVID-19 Documentation Submission



## References

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2. Ministry of Health. Health Care Provider Fact Sheet: COVID-19 Vaccine [Internet]. Ministry of Health; 2024 [cited 2024 Oct 23]. Available from: <https://www.ontario.ca/files/2024-10/moh-covid-19-vaccine-fact-sheet-en-2024-10-03.pdf>
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9. Ontario. Human Rights Code, R.S.O. 1990, c. H.19. [cited 2024 Oct 23]. Available from: <https://www.ontario.ca/laws/statute/90h19>

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

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