



Policy:	COVID-19 Vaccination	
Owner:	Director, Occupational Health and Infection Control Integrated Director, Medical Affairs	
Sponsor:	Vice President, Human Resources and Facilities Integrated Vice President, Medical and Academic Affairs	
Approval by:	Senior Leadership Team	Date: 2021-08-25
Original Effective Date: 2021-08-30	Reviewed Date(s):	Revised Date(s):

<p>This policy applies to: or</p>	<input checked="" type="checkbox"/> St. Joseph's Health Care London <input type="checkbox"/> Mount Hope Centre for Long-Term Care <input type="checkbox"/> Parkwood Institute Main Building <input type="checkbox"/> Parkwood Institute Mental Health Care Building <input type="checkbox"/> St. Joseph's Hospital <input type="checkbox"/> Southwest Centre for Forensic Mental Health Care
<p>(If this policy applies to all sites, please check St. Joseph's Health Care London only.)</p>	

<p>There is a similar/same policy at LHSC: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If yes, Policy Type: <input type="checkbox"/> Department <input checked="" type="checkbox"/> Corporate</p> <p>Policy Name: COVID-19 Vaccination Program</p> <p>Policy Owner: Director, Wellness, Safety, Risk and Privacy Integrated Director Medical Affairs</p>

BACKGROUND

[COVID-19](#) is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus. It is characterized by fever, cough, shortness of breath and a number of other symptoms. Asymptomatic infection and subsequent transmission have been documented. COVID-19 is primarily transmitted person-to-person through respiratory droplets. The risk of severe disease increases with age and is elevated in those with underlying medical conditions.

It is the position of the [National Advisory Committee on Immunization \(NACI\)](#) that:

- Those most likely to transmit COVID-19 to those at high risk of severe illness and death from COVID-19 and workers essential to maintaining the COVID-19 response, including healthcare workers, be prioritized to receive the COVID-19 vaccine.
- The authorized COVID-19 vaccines recommended for use by NACI have been shown to be safe, as well as efficacious against symptomatic laboratory-confirmed COVID-19 disease.
- Everyone in Canada should be vaccinated against COVID-19 once the vaccine is available to them.

PURPOSE

The purpose of this policy is to outline organizational expectations with regards to COVID-19 [immunization](#) of [staff](#) and [affiliates](#). All eligible staff and affiliates are strongly encouraged to receive a COVID-19 vaccine, unless it is medically contraindicated.

This policy is applicable to all St. Joseph's Health Care London (St. Joseph's) staff and affiliates. This policy does not apply to [visitors/families](#), [patients](#) or residents with the exception of [essential caregivers](#) and visitors at Mount Hope Centre for Long Term Care and Veteran's Care Program which have specific requirements under the Minister of Long Term Care Home's Directive 3.

POLICY

As a health care organization, St. Joseph's recognizes the critical role immunization has in our protection from COVID-19. St. Joseph's is committed to improving the health system and creating a healthier community, championing a culture of quality and safety, and supporting the health and well-being of our staff and affiliates.

PROCEDURE

1. All St. Joseph's staff and affiliates should make an informed decision about whether to receive a COVID-19 vaccine and are required to comply with one of the three requirements outlined below:
 - 1.1 Be [fully vaccinated](#) for COVID-19 AND provide [proof of vaccination](#) to Occupational Health and Safety Services.
OR
 - 1.2 Where all Health Canada approved COVID-19 vaccines are medically contraindicated, the individual must provide written proof of the [medical contraindication](#) to Occupational Health and Safety Services (Refer to [Medical Contraindications or Exemptions](#) (Appendix A)) from their physician or nurse practitioner that indicates:
 - 1.2.1. that the person cannot be vaccinated against COVID-19; and
 - 1.2.2. the effective time period for the medical reason (i.e., permanent or time limited)**OR**
 - 1.3 Where a staff and affiliate elects not to be vaccinated, are unsure of whether they want to be vaccinated or refuse to disclose proof of vaccination, they are required to complete a COVID-19 vaccine education module which addresses:
 - 1.3.1 How COVID-19 vaccines work;
 - 1.3.2 Vaccine safety related to the development of the COVID-19 vaccines;
 - 1.3.3 The benefits of [vaccination](#) against COVID-19;
 - 1.3.4 Risks of not being vaccinated against COVID-19; and
 - 1.3.5 Possible side effects of COVID-19 vaccination.
 - 1.3.6 If after completion of that module, the individual chooses to receive the COVID-19 vaccination, they must provide proof of vaccination or will be assumed to be [unvaccinated](#).
2. Any staff and affiliates covered in [section 1.2](#) and [section 1.3](#) above are required to undergo rapid antigen testing on Monday, Wednesday and Fridays.
 - 2.1 Staff and affiliates of St. Joseph's are encouraged to complete their rapid testing in the community (i.e., pharmacies) and must provide proof of a negative result to Occupational Health and Safety Services. Staff and affiliates are to complete rapid testing on their own time regardless of where testing is completed. Any costs associated with rapid antigen testing in the community are the sole responsibility of the staff or affiliate.
 - 2.2 As an alternative, St. Joseph's will provide rapid antigen testing to staff and affiliates through onsite clinics until no later than December 15, 2021. Staff and affiliates are to complete rapid testing on their own time regardless of where testing is completed. Staff and affiliates are required to present hospital ID and a valid Health Card, as well as share their location of work. Staff and affiliates are required to wait for the results of their rapid antigen testing before leaving the testing area.
 - 2.3 Rapid Antigen Testing will continue as per the current process at Mount Hope Centre for Long Term Care, however the required testing frequency will be increased to three times weekly (Monday to Sunday) as per the above policy and the current process in place. This exception is to accommodate rapid testing requirements for essential caregivers and visitors under the [Minister's Directive COVID-19: Long-Term Care Home Surveillance Testing and Access to Homes](#) which outlines rapid testing requirements.
3. Alternate compliance requirements apply to the following:
 - 3.1 For all new staff and affiliates hired after August 20, 2021 vaccination will be mandatory as per the Pre-Employment Health Review process.
 - 3.2 All volunteers are required to be fully vaccinated and submit proof of vaccination to Occupational Health and Safety Services. For the purposes of this policy, all Care Partners will be considered as volunteers.
 - 3.3 All unpaid students and Clinical Instructors will be required to have one dose of an approved COVID-19 vaccine by September 01, 2021 or provide proof of medical exemption. All unpaid students and Clinical Instructors will be required to be fully vaccinated by November 01, 2021 or provide proof of medical exemption. All students who are unvaccinated between the effective date of this policy and November 01, 2021 shall be required to undergo rapid testing Monday, Wednesday and Friday (Monday to Sunday) at their own expense. Each student and Clinical Instructor's status will be managed and tracked by their respective school. Should the school have more stringent requirements in place, the school's policy will apply as per the affiliation agreement. Each school will be required to provide aggregate statistical information to Occupational Health and Safety Services on a monthly basis for the purposes of Ministry reporting, case and contact management, outbreak management or another reason deemed appropriate.

- 3.4 All tenants of St. Joseph's are required to be compliant with the policy as outlined above. The status of each tenant's staff member(s) onsite at St. Joseph's will be managed and tracked by their respective employer. Should the tenant have more stringent requirements in place, the tenant's policy will apply. Each tenant will be required to provide aggregate statistical information to Occupational Health and Safety Services on a monthly basis for the purposes of Ministry reporting, case and contact management, outbreak management or another reason deemed appropriate.
- 3.5 Staff of [third-party](#) Vendors or Contractors (i.e., vendors providing supplies to the Laboratory, Food Services, Pharmacy and Facilities) are required to comply with the following:
 - 3.5.1 Third-Party Vendors or Contractors who are at one of St. Joseph's sites on a weekly basis are required to comply with the policy outlined in [section 1](#). Compliance will be managed and tracked by their respective employer.
 - 3.5.2 Third-Party Vendors or Contractors who are not at one of St. Joseph's sites on a weekly basis are required to provide proof of a negative rapid antigen testing that has been completed within 48 hours prior to coming on site. Compliance will be managed and tracked by their respective employer.
4. Any staff and affiliate covered under this policy who is considered to be unvaccinated as per section 1.2 and section 1.3 above will not be permitted to work in an outbreak area and will follow the direction of Public Health and Medical Director of Infection Control regarding outbreak management.
5. It is the responsibility of the [Leader](#) to follow up with staff and affiliates subject to the criteria in section 1.2, section 1.3 and [section 2](#) to ensure compliance with the education and rapid testing requirements outlined in this policy. Occupational Health and Safety Services will provide the Leader a report of those staff and affiliates requiring education and rapid testing on a weekly basis.
6. Where proof of vaccination or medical exemption is not submitted to Occupational Health and Safety Services, regardless of education completion, it will be assumed the staff and affiliate is unvaccinated for the purpose of contact tracing or outbreak management.
7. Failure to adhere to this policy may result in disciplinary action, up to and including termination of employment/contract or loss of appointment or affiliation with the organization.
8. This policy is not withstanding the wide authority that the Medical Officer of Health has under the Health Protection and Promotion Act (1990).

DEFINITIONS

Affiliates – individuals who are not employed by the organization but perform specific tasks at or for the organization, including appointed professionals (e.g., physicians, dentists), students, volunteers, researchers, contractors, or contracted staff who may be members of a third-party contract or under direct contract to the organization, and individuals working at the organization, but funded through an external source, (e.g., research employees funded by Western).

COVID-19 – An acute respiratory illness in humans caused by a coronavirus, capable of producing severe symptoms and in some cases death, especially in older people and those with underlying health conditions. It was originally identified in China in 2019 and became pandemic in 2020.

Confirmed COVID-19 Outbreak – Defined as two or more lab-confirmed COVID-19 cases on a unit or in a home, with an epidemiological link within a 14-day period, where at least one case could have reasonably been nosocomial. The declaration of the outbreak will be made by Infection Prevention and Control in consultation with Middlesex London Health Unit (MLHU) or South West Public Health (SWPH) as applicable.

Essential Caregiver – An essential caregiver is a person identified and designated by the patient/resident – family member, friend, neighbour - who provides important personal, social, psychological and/or physical support, assistance and care, usually without pay, for people in need of support due to frailty, illness, degenerative disease, disability, or end of life circumstances. An essential caregiver does not have to be living with the person they are supporting. They do not have to be biologically related to the patient; can provide support and care for short periods of time (e.g., days) or for extended periods of time (e.g., years)

Family/Visitor - Anyone who is not St. Joseph's employee or affiliate such as: discharged patients; members of the public; and friends and family members visiting staff or patients.

Fully Vaccinated – For the purposes of this document, fully vaccinated means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by WHO (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.

Herd Immunity – Occurs when a large portion of a community (the herd) becomes immune to a disease, making the spread of disease from person to person unlikely. As a result, the whole community becomes protected, not just those who are immune.

Immunization – A process by which a person becomes protected against a disease through vaccination. This term is often used interchangeably with vaccination or inoculation.

Leader – Includes Chief, Division Chief, Site Chief, Operational Leader, Director, Coordinator, Professional Practice Consultant, Union Leader, Vice President or Chief Executive Officer (CEO).

Medical Contraindication or Exemption – A medical reason preventing a person from receiving the COVID-19 vaccine. Where all Health Canada approved COVID-19 vaccines are medically contraindicated, the individual must provide written proof of the medical contraindication from their physician or nurse practitioner that indicates that the person cannot be vaccinated against COVID-19 AND the effective time period for the medical reason (i.e., permanent or time limited). Acceptable medical contraindications include those outlined in Appendix A – Medical Contraindications or Exemptions).

Patient – Refers to any recipient of health care services, i.e., registered inpatient, outpatient, client or resident

Personal Health Information – As defined by the Personal Health Information Protection Act, 2004 (PHIPA) “...means identifying information about an individual in oral or recorded form, if the information,

- a. relates to the physical or mental health of the individual, including information that consists of the health history of the individual’s family,
- b. relates to the providing of health care to the individual, including the identification of a person as a provider of health care to the individual,
- c. is a plan of service within the meaning of the Home Care and Community Services Act, 1994 for the individual,
- d. relates to payments or eligibility for health care, or eligibility in coverage for health care, in respect of the individual,
- e. relates to the donation by the individual of any body part or bodily substance of the individual or is derived from the testing or examination of any such body part or bodily substance,
- f. is the individual’s health number, or
- g. identifies an individual’s substitute decision-maker.”

Proof of Vaccination – If an individual has received the COVID-19 vaccine in Ontario, the only acceptable proof of vaccination is the receipt provided by the Ministry of Health. For people who have been vaccinated outside of Ontario, acceptable proof is based on the criteria provided by the province/state in which they received their vaccine but only NACI approved vaccines will be accepted. Proof shall include your name, date of birth, date of vaccination, vaccine name, lot number, and name of the health care practitioner administering the vaccine. An individual who does not have a copy of their vaccination can download their COVID-19 vaccine receipt here: <https://covid19.ontariohealth.ca/> Proof of COVID-19 vaccination must be sent to Occupational Health and Safety Services via email (sjhc Vaccination@sjhc.london.on.ca) or in person to Occupational Health and Safety Services at St. Joseph’s Hospital or Parkwood Institute Main Building.

Staff – individual who is hired and paid by the organization

Third Party – For the purpose of this policy, refers to vendors, agencies or other individuals which do not have an employment, educational or a privilege association with the organization.

Unvaccinated – Anyone who has chosen not to be vaccinated, anyone who has refused to disclose vaccination status and anyone who has a documented medical exemption

Vaccination – The act of introducing a vaccine into the body to produce immunity to a specific disease. Vaccination is a simple, safe, and effective way of protecting people against harmful diseases, before they come into contact with them. It uses your body’s natural defenses to build resistance to specific infections and makes your immune system stronger.

REFERENCES

Related Corporate Policies

[Outbreak Management](#)

[Outbreak Management of Respiratory Infections and Influenza – Non-Acute Care](#)

Legislation

Government of Ontario (1990) [Public Hospitals Act, Regulation 965: Hospital Management](#)

Other Resources

Canadian Nurses Association (CNA) [Coronavirus Disease \(COVID-19\)](#)

Chief Medical Officer of Health Directive: [Directive 6 for Public Hospitals COVID-19 Immunization Policy, effective September 07, 2021.](#)

College of Nurses of Ontario (CNO) [COVID-19 Vaccination Information](#)

[COVID-19 Fully Vaccinated Individuals: Case, Contact and Outbreak Management Interim Guidance](#)

Government of Canada [National Advisory Committee on Immunization \(NACI\). COVID-19](#)

Government of Canada [National Advisory Committee on Immunization: Recommendation for people previously infected with SARS-CoV-2 virus](#)

Government of Canada [National Advisory Committee on Immunization Recommendations on the use of COVID-19 Vaccines](#)

Middlesex-London Health Unit [Coronavirus](#)

Ministers Directive: [Long Term Care Home COVID-19 Immunization Policy, effective July 01, 2021.](#)

Ministry of Health [Case and Contact Management Resources.](#)

Ministry of Health (2021-05-06) [COVID-19 Fully Vaccinated Individuals: Case, Contact, and Outbreak Management Interim Guidance](#)

Ministry of Health (2021-08-18) [Resource Guide: Ministers Directive: Long Term Care Home COVID-19 Immunization Policy.](#)

Public Health Ontario (2021-06) [Interim Guidance on Infection Prevention and Control for Health Care Providers and Patients Vaccinated Against COVID-19 in Hospital and Long-term Care Settings](#)

St. Joseph's [COVID-19 Intranet](#)

St. Joseph's [LearningEdge](#) (COVID-19 Vaccination Program)

APPENDICES

Appendix A

[Accepted Medical Contraindications or Exemptions](#)