

# NORTHERN ONTARIO SCHOOL OF MEDICINE

# Policy

COVID-19 Vaccination – Learners in Clinical Settings					Class: A
Approved By:	NOSM's Emergency Response Team				
Approval Date:	February 7, 2022	Effective Date:	February 7, 2022	Review Date:	As needed
Responsible Portfolio/Unit/ Committee:	Administration and Operational Support/Emergency Response Team (ERT)				
Responsible Officer(s):	Chief Operating Officer				

# 1.0 Purpose

The Northern Ontario School of Medicine (NOSM) continues to take proactive steps to ensure the safety and wellbeing of all our learners. As part of those measures, NOSM is implementing this policy requiring learners accessing NOSM facilities and clinical sites to be vaccinated against COVID-19.

While COVID-19 vaccines are highly effective at reducing an individual's risk of infection following a high-risk exposure, they are not 100% protective and vaccinated individuals may develop COVID-19 (known as breakthrough infections). As such, NOSM continues to promote and practice public health measures outline in NOSM's <u>COVID-19 Safety Plan</u> on campus. Learners are required to comply with the COVID-19 protocols, policies and regulations at clinical sites.

This policy is enacted and enforced in accordance with Ministry of Health's Directive #6, guidance of the Postsecondary Education Health Measures Framework for Fall 2021 (the Framework) based on the advice of the Chief Medical Officer of Health (CMOH). NOSM is subject to the requirements outlined in <u>O. Reg. 364/20: Rules for Areas at Step 3 and at the Roadmap Exit Step</u>

This policy is subject to rapid change and at the discretion of the Emergency Response Team in accordance with Government Directives and Regulations, provincial public health guidance (CMOH), Ministry of Colleges and Universities (MCU) guidelines, Ministry of Health (MOH) and other applicable legislation as the COVID-19 pandemic evolves.

# 2.0 Scope

This policy applies to all NOSM students, residents and visiting learners on clinical placement.

# 3.0 Definitions

**Vaccine** means a COVID-19 vaccine, approved for use by Health Canada and/or the World Health Organization.

#### Fully Vaccinated means:

- a) Having received:
  - i. the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada;
  - One or two doses of a COVID-19 vaccine not authorized by Health Canada, followed by one dose of a COVID-19 mRNA vaccine authorized by Health Canada; or
  - iii. Three doses of a COVID-19 vaccine not authorized by Health Canada.
- b) It has been at least 14 days since receiving the final dose of the COVID-19 vaccine prior to providing proof of being fully vaccinated.

**Medical exemption** means grounds to be exempted from getting a COVID-19 vaccine based on the risk of substantive injury and/or disability. CPSO statement issued September 1, 2021 states that there are very few acceptable medical exemptions to the COVID-19 vaccination. The medical exemptions include an allergist/immunologist-confirmed severe allergy or anaphylactic reaction to a previous dose of a COVID-19 vaccine or to any of its components that cannot be mitigated; a diagnosed episode of myocarditis/pericarditis after receipt of an mRNA vaccine.

**Proof of vaccination** means an official dose administration receipt and/or an enhanced vaccine certificate issued by a Provincial Government. Those vaccinated in Ontario were issued an enhanced receipt/QR code from the Ministry of Health with name, date of vaccination and product name (i.e. Pfizer, Moderna etc. COVID-19 enhanced vaccine certificates can be downloaded through the COVID-19 vaccination provincial portal <a href="https://covid19.ontariohealth.ca/">https://covid19.ontariohealth.ca/</a> Individuals receiving vaccine in other jurisdictions should provide vaccination record or receipts issued by your province or territory.

**COVID-19 Testing** means rapid antigen screening/point of care testing for COVID-19 (COVID-19 POCT) at intervals of twice per week (if asymptomatic). Device used for COVID-19 POCT must be approved by Health Canada following the COVID-19 Guidance: Considerations for Antigen Point-of-Care Testing (PDF). It is the responsibility of the learner to arrange and schedule appointments with testing centres to obtain COVID-19 POCT. **COVID-19 Test Results** means providing verification of the negative test result in a manner that enables NOSM to confirm the result at its discretion.

**COVID-19 Vaccination Educational Program** will be mandatory for any learner that has not been vaccinated. Proof of completing an educational session approved by the clinical site/hospital about the benefits of vaccination prior to declining the vaccination for any reason other than a medical reason is required.

# 4.0 Procedures

# 4.1 Proof of Vaccination

All individuals who engage in clinical placements through NOSM are required to follow the mandatory COVID-19 vaccination policies of their clinical location, which may include the following elements

- a) Proof of full vaccination against COVID-19, which may be a condition for clinical placement or
- b) Written proof of medical reason, provided by a physician or registered nurse in the extended class that sets out a documented medical reason for not being fully vaccinated against COVID-19, and the effective time period for that medical reason: or
- c) Completion of an education session approved by the hospital/clinical site about the benefits of vaccination prior to declining the vaccination for any reason other than a medical reason.

The mandatory COVID-19 vaccination policies at clinical placement sites may require proof of full vaccination against COVID-19 as a condition for clinical placement.

All individuals who have provided written proof of a medical reason may be required to submit to regular antigen point of care testing and demonstrate a negative result. Individuals will be required to provide verification of the negative test result to NOSM in a manner that enables NOSM to confirm the result. **See Section 4.2.** 

NOSM will consider on an individual basis requests for exemptions on medical grounds or protected under the Human Rights Code.

UME and NODIP students should contact the Assistant Dean, Learner Affairs and PGME residents contact the Assistant Dean, Resident Affairs to request such an accommodation.

# 4.2 Regular Antigen Point of Care Testing

An individual that does not provide proof of being fully vaccinated against COVID-19 in accordance with paragraph 4.1(a),

 a) May be required to submit to regular antigen point of care testing for COVID-19 and demonstrate a negative result, at a minimum of twice every seven days. The frequency and type of testing will be determined by the clinical placement site and may vary. The COVID-19 vaccination policy of the clinical placement site will determine the applicability of this provision.

- b) Provide verification of the negative test result in a manner determined by NOSM to confirm the result at its discretion.
- c) NOSM will be responsible for communicating the test results to the clinical placement site/hospital. Test results will be required to be submitted to NOSM is a manner and frequency that complies with the policy of the clinical site/hospital:

Postgraduate Medical Education by email at <a href="mailto:postgrad@nosm.ca">postgrad@nosm.ca</a>

UME Learners by email at <a href="mailto:records@nosm.ca">records@nosm.ca</a>

NODIP learners by email at NODIP@nosm.ca

#### 4.4 Personal Protective Equipment (PPE)

PPE protocols and restrictions at clinical sites may vary between fully vaccinated and unvaccinated individuals. PPE protocols at the clinical site must be complied with for clinical placements.

#### 4.5 Mandatory COVID-19 Education Sessions and Access Campus Training

All learners will be required to complete Mandatory Training in order to access NOSM campus locations at Lakehead and Laurentian University. The Mandatory Training Plan includes COVID-19 Education including links to additional resources.

Attestation to the completion of Mandatory Training, including the COVID-19 education and acknowledgement of the Non-Medical Masks and Face Coverings Policy is required at the completion of the training module.

# 4.6 Collection, Maintenance and Disclosure of Statistical (non-identifiable) information:

- a) Upon request of Ontario's Chief Medical Officer of Health, disclose the Statistical Information to the Ministry of Health and Ministry of Colleges and University (MCU) in the manner and within the timelines specified by the request. The Ministry of Health and MCU may further disclose this Statistical Information and may make it publicly available.
- b) Documentation that includes (collectively, "the Statistical Information"):
  - i. The number of Required Individuals that provided proof of being fully vaccinated against COVID-19
  - ii. The number of Required Individuals that provided a documented medical reason for not being fully vaccinated against COVID-19;
  - iii. The number of Required Individuals that completed an educational session about the benefits of COVID-19 vaccinations;
  - iv. The total number of NOSM Required Individuals to whom these instructions apply.

### 5.0 Roles and Responsibilities

NOSM will focus on educating members of the NOSM learner community about the Policy, including the benefits of vaccination with regard to community transmission of COVID-19, as well as the importance of accommodation and personal privacy regarding medical or other conditions.

### **5.1 Enforcement and Compliance**

- **5.1.1** NOSM will manage compliance and enforcement of this policy in accordance with applicable policies and procedures and/or collective agreements.
- **5.1.2** Program leaders are required to ensure all of their students, residents, and visiting learners have a thorough understanding of these requirements and adhere to them.
- **5.1.3** Individuals who do not adhere to this policy or make false attestations about, or provide false documents related to, being vaccinated may be subject to disciplinary actions, up to and including suspension or dismissal for learners, termination for employees, voiding of contracts for clients and contractors and removal/restriction from campus for visitors and/or any other attendees; such individuals could also be at risk of criminal liability.

#### 6.0 Related Documents

Occupational Health and Safety Policy

Reopening of Ontario Act, 2020 (O. Reg. 364/20)

NOSM COVID-19 Safety Plan

Instructions Issued by the Office of the Chief Medical Officer of Health

Postsecondary Education Health Measures Framework for Fall 2021

<u>COVID-19 Directive #6 for Public Hospitals within the meaning of the Public Hospital Act.</u> Service Providers in accordance with the Home Care and Community Service Act, 1994

#### **Getting Help**

Queries regarding interpretations of this document should be directed to:

Director of Human Resources by email at hr@nosm.ca

Postgraduate Medical Education by email at postgrad@nosm.ca

UME Learners by email at records@nosm.ca

This policy is available, upon request, to a Public Health Inspector or other person authorized to enforce the Emergency Management and Civil Protection Act, R.S.O. 1990 and related Regulations.

DO NOT REMOVE THIS VERSION RECORD FROM THIS DOCUMENT				
Version	Date	Authors/Comments		
1.0	September 7, 2021	Original policy - Approved by NOSM's Emergency Response Team		
2.0	October 29, 2021	Policy updated in accordance with latest Government directives		
3.0	January 19, 2022	Policy updated in accordance with polices of Academic Health Science Centres		
4.0	February 7, 2022	Policy updated with revised definitions		