

2.0 Scope

This policy applies to all members of the NOSM community, students, researchers, staff, faculty, administration, members of the Board of Directors, volunteers, visitors and guests (herein referred to as “**Required Individuals**”) who access NOSM facilities. This includes all individuals entering any indoor facility at NOSM at anytime and for any purposes.

3.0 Definitions

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

Fully Vaccinated means:

- a) Having received:
 - i. The full series of a COVID-19 vaccine or combination of such vaccines approved by Health Canada; or
 - ii. One or two doses of a COVID-19 vaccine not authorized by Health Canada (but authorized by WHO), 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 (but authorized by WHO).
- b) It has been 14 days since receiving the final dose of the COVID-19 vaccine prior to providing proof of being fully vaccinated.

NOSM Facilities are the campus buildings controlled by NOSM situated in Sudbury and Thunder Bay.

Medical exemption: There are very few acceptable medical exemptions to the COVID-19 vaccination. The following are considered acceptable:

- Severe Allergy - 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;
- Myocarditis/Pericarditis - 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 (e.g. Pfizer, Moderna etc.). COVID-19 enhanced vaccine certificates can be downloaded through the COVID-19 vaccination provincial portal <https://covid19.ontariohealth.ca/>.

COVID-19 Testing (if asymptomatic) means rapid antigen screening/point of care testing for COVID-19 (COVID-19 POCT). Testing must be completed by a licensed pharmacy or practitioner using a device used for COVID-19 POCT approved by Health Canada.

4.0 Procedures

4.1 Proof of Vaccination

All individuals permitted by their supervisor/program area, to enter or remain in the indoor spaces of NOSM facilities, are required to be fully vaccinated against COVID-19. All required individuals who attend NOSM campus facilities must provide:

- a) Proof of full vaccination against COVID-19; or
- b) Where all Health Canada approved COVID-19 vaccines are medically contraindicated, the individual must provide written proof of the medical contraindication to HR@nosm.ca (Refer to Statement of Medical Conditions / Disability (**Appendix A**))
- c) from their physician or nurse practitioner that indicates:
 - i. a documented medical reason that the person cannot be vaccinated against COVID-19; and
 - ii. the effective time period for that medical reason (i.e., permanent or time limited)

OR

- d) Where an individual 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 and provide an attestation to the completion of the module which addresses:
 - i. How COVID-19 vaccines work;
 - ii. Vaccine safety related to the development of the COVID-19 vaccines;
 - iii. The benefits of vaccination against COVID-19;
 - iv. Possible side effects of COVID-19 vaccination
 - v. If after completion of that module, the individual chooses to receive vaccination, they must provide proof or will be assumed to be unvaccinated.

4.2 Vaccine Exemptions

Vaccine exemption requests, received from NOSM employees, may be granted if supported for medical exemption reasons or for grounds of creed/religion as recognized by the Ontario Human Rights Commission.

Required individuals who are not eligible for the third dose vaccine booster to be considered “fully vaccinated” per this policy due to having contracted COVID-19 within the last 30 days may contact Human Resources to request an extension.

Exemptions will not be considered for visitors, guests and/or any other attendees.

4.3 Accommodations

Any individual who cannot be vaccinated on medical or other grounds recognized by the Ontario Human Rights Code can request an accommodation.

At the sole discretion of NOSM, employees with an approved exemption to being vaccinated may be accommodated through measures other than being granted access to campus.

Individuals who receive a medical and/or creed/religion-based exemption and legally required to be accommodated will be accommodated to the point of undue hardship.

Accommodations will not be extended to visitors, guests and/or any other attendees.

4.4 Rapid Antigen Screening/Point of Care Testing

An Individual, required to be on NOSM campus, that does not provide proof of being fully vaccinated against COVID-19 in accordance with paragraph 4.1 (a), shall:

- a) Submit to rapid antigen point of care testing for COVID-19 and demonstrate a negative result, at a minimum of once every seven days.
- b) Provide verification of the negative test result to confirm the result to Human Resources by email at hr@nosm.ca.

Procedures for mandatory testing will be communicated to non-vaccinated individuals prior to their attendance on campus.

An individual who has recovered from a previously confirmed COVID-19 infection on a molecular or rapid antigen test may resume asymptomatic screening testing after 30 days from their COVID-19 infection (based on the earlier date of their symptom onset or specimen collection).

4.5 Informed Consent

Visitors, guests and contractors that are required to be on campus will complete an Informed Consent and provide proof of vaccination status.

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

- a) 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.
- b) Disclose the Statistical Information to the Ministry of Colleges and Universities (MCU) in the manner and within the timelines specified by MCU. MCU may further disclose this Statistical Information and may make it publicly available.

5.0 Roles and Responsibilities

NOSM will focus on educating members of the NOSM 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

- 5.2 NOSM will manage compliance and enforcement of this policy in accordance with applicable policies and procedures and/or collective agreements.
- 5.3 Supervisors are required to ensure all of their employees have a thorough understanding of these requirements and adhere to them.
- 5.4 Individuals who fail to adhere to this policy or who make false attestations about, or provide false documents related to being vaccinated may be subject to disciplinary actions in accordance with professionalism policies, collective agreements, and any other applicable policies, up to and including expulsion for students, 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](#)

7.0 Getting Help

Queries regarding interpretations of this document should be directed to:

Director of Human Resources by email at hr@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 with revised definitions
4.0	February 7, 2022	Policy updated with revised definitions

Appendix A

STATEMENT OF MEDICAL CONDITION/DISABILITY

COVID-19 VACCINE EXEMPTION FORM

Important Information - Please Read

NOSM has implemented a Policy on COVID-19 Vaccination (the “Policy”) to promote and protect the health, safety, and well-being of persons and the economic, social, and well-being of the community during the COVID-19 pandemic declared by the World Health Organization. The definitions as outlined in the Policy are to be utilized in this Statement of Medical Condition/Disability Form (the “Form”).

As per the Policy, NOSM requires that all individuals attending the NOSM Campus or clinical learning sites be fully vaccinated against COVID-19 unless they have a valid exemption.

Forms must be properly completed and uploaded no later than October 7th, 2021

By submitting this Form, individuals understand:

1. That by attending, they may be subject to additional restrictions or requirements that other individuals who are Fully Vaccinated may not be subject to/required to do. Such restrictions or requirements may include, but are not limited to: attestations and mandatory vaccine education, additional/ongoing COVID-19 rapid antigen screening and/or PCR testing; limitations and/or restrictions for NOSM travel and accommodations; and any additional health and safety measures as determined by the NOSM.
2. That they may choose to be vaccinated at a later date.
3. That they are requesting to be accommodated based on their medical condition/disability and accordingly be exempted from the vaccination requirements of NOSM as set out in the Policy.

Instructions for Individuals and Health Care Practitioner

The individual named in Section 1 of this Form has requested exemption from NOSM’s policy on COVID-19 Vaccination which requires individuals attending who are attending one of NOSMs campuses or a clinical learning site to be fully vaccinated against COVID-19. NOSM will review this form to determine eligibility for an accommodation to be exempted from the COVID-19 vaccine due to a medical condition/disability.

Registered Health Care Practitioner: Section 2 of this Form must be completed by a Physician or Registered Nurse in the Extended Class (Nurse Practitioner) based on a current, thorough, and appropriate assessment.

SECTION 1 – PERSONAL INFORMATION				
Last Name			First Name	
Student or Employee ID#				
Unit Number	Street Number	Street Name		P.O. Box
City/Town		Province/State	Country	Postal Code

SECTION 2 - Declaration of Physician or Registered Nurse in the Extended Class (Nurse Practitioner)

I, _____
 (name of physician or registered nurse in the extended class)

certify that, in my professional opinion, due to a medical condition/disability, the named individual in Section 1 requires an accommodation to be exempted from receiving the COVID-19 vaccine and accordingly should be exempted from the requirements as set out in NOSM’s Policy, which requires individuals attending a NOSM Campus or clinical learning site to be fully vaccinated against COVID-19. I have completed an individual assessment, considered the Ministry of Health: COVID-19 Vaccination Recommendations for Special Populations and reviewed risks and benefits with the above-named individual.

If the medical condition/disability is temporary, please indicate the prognosis for the medical condition/disability:
 from _____ to _____.

SECTION 3 – Signature of Physician or Registered Nurse in the Extended Class (Nurse Practitioner)			
Name of Physician or Registered Nurse in the Extended Class		Registration/Licence No.	
Business Address Unit Number	Street Number	Street Name	P.O. Box
City/Town	Province/State	Country	Postal Code
Signature of Physician or Registered Nurse in the Extended Class		Date	
Stamp			

The Northern Ontario School of Medicine protects your privacy and your personal information. Any personal information about an individual collected in respect of this Form and the Policy is in accordance with the Freedom of Information and Protection of Privacy Act (“FIPPA”). Such information will only be used for the purposes and functions outlined in the Policy and this Form. If an individual has any questions about the collection, use, and disclosure of this information please contact Human Resources at hr@nosm.ca