

 <p>Nipissing First Nation Health Services PANDEMIC PLAN</p>	Original Date: September 16, 2021	Number: 00001
	Review:	Revised:
	Category:	
	Approved By:	
Subject: COVID-19 Vaccination Status Disclosure Policy		

POLICY STATEMENT

In accordance with a mandate issued by the Office of the Chief Medical Officer of Health in Ontario, Nipissing First Nation (also referred to herein as “NFN”) is implementing a COVID-19 vaccination disclosure policy. NFN promotes fully vaccination and is committed to implementing additional measures to provide a safer workplace and to protect the public receiving services from NFN.

This policy must be fully implemented by October 1, 2021, and will continue to be subject to applicable local, provincial, and federal public health regulations.

This policy does not replace the need to continue with other public health and infection control measures, such as handwashing and sanitizing, wearing a face covering, physical distancing, completion of daily screening, and the use of personal protective equipment (PPE).

The policy does not replace the Ministry of Health’s testing and clearance guidelines for individuals who are a close contact (high risk exposure) or suspected or confirmed to have COVID-19.

PURPOSE

The Chief and Council of Nipissing First Nation have previously approved a mandate to align NFN’s jurisdiction over health services with federal and provincial laws, directives, and guidelines to ensure consistency and to minimize confusion over approaches to addressing public safety measures during the COVID-19 pandemic.

The purpose of this policy is outline NFN’s requirements with respect to disclosure of COVID-19 vaccination status in keeping with applicable directives and orders issued by public health entities and requirements of federally regulated workplaces.

This policy addresses Directive #6 issued by Chief Medical Officer of Health under section 77.7 (1) of the *Health Protection and Promotion Act* for organizations to establish a COVID-19 vaccination policy with procedures that serve to protect the health of individuals against the immediate risk of COVID-19 including the increased transmissibility and disease severity of the COVID-19 Delta variant and others that may develop.

This policy is also subject to the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*, under subsection 2 (2.1) of Schedule 1 and Schedule 4 of O.Reg.364/20 Rules for Areas at Step 3 and at the Roadmap Exit Step. This requires that organizations comply with any advice, recommendations and instructions issued by the Office of the Chief Medical Officer of Health.

DEFINITIONS

1. **Fully Vaccinated** means having received both a 1st and 2nd dose of a Health Canada approved or recognized COVID-19 vaccine (or vaccine combination) with at least 14 days having passed since the date that the individual received the 2nd dose.
2. **Unvaccinated** means not having received two (2) doses of a Health Canada approved or recognized COVID-19 vaccine (or vaccine combination) and includes having received 0 or 1 dose of a vaccine (with or without a documented medical exemption or reasons other than medical). Individuals who do not provide proof of Fully Vaccinated status will be considered Unvaccinated.
3. **Booster** means an additional dose of a COVID-19 vaccine after an individual is Fully Vaccinated.
4. **High-Risk Setting** means a setting where the risk of contracting and transmitting COVID-19 and the Delta variant is higher. The Ministry of Health includes in these higher-risk settings: post-secondary institutions; licensed retirement homes; women's shelters; congregate group homes; day programs for adults with developmental disabilities; children's treatment centres and other services for children with special needs; and licensed children's residential settings. NFN expands this definition to also include the NFN afterschool program and NFN childcare settings.

SCOPE

This policy applies to NFN as an organization that must comply with the *Home Care and Community Services Act, 1994*; the *Local Health System Integration Act, 2006*; the *Canada Labour Code*; and as a Licensee within the meaning of the *Child Care and Early Years Act, 2014*.

As a private school operated by a Band Council, Nbisiing Secondary School (also referred to herein as "NSS") does not follow the *Education Act*. In the interest of workplace safety and the potential for student transfer between other secondary schools, students attending Nbisiing Secondary School will be subject to this policy.

To ensure consistency within the organization, all Nipissing First Nation employees, volunteers, Nbisiing Secondary School students and children attending the NFN afterschool program or an NFN childcare centre are subject to this policy.

Exemptions from this policy include:

- Any individual not eligible to receive a vaccine due to an age restriction.

- An individual in need of urgent medical care or treatment.
- Individuals employed by another organization that provides contracted services at the request of NFN. These individuals are subject to the policies of the organization under which they are employed.

PROCEDURES and GUIDELINES

1. Proof of Vaccination

1.1. Proof of vaccination can be provided by one of the following means:

- A printed, emailed, or downloaded (PDF) copy of a vaccine receipt from the province of Ontario confirming that the individual is Fully Vaccinated.

2. Vaccination Disclosure

2.1. Individuals subject to this policy are required to complete the *Nipissing First Nation Vaccination Disclosure Form* appended to this policy.

2.2. Completed forms are to be submitted to NFN Health Services by **October 1, 2021** and can be delivered as follows:

- Drop off or mail to: NFN Health Services, 58 Semo Road, Garden Village, ON P2B 3K2 "Attention: CHN – CONFIDENTIAL"
- Fax to: NFN Health Services at (705) 753-5087 "Attention: CHN-CONFIDENTIAL"
- Email to chn@nfn.ca with subject line "Disclosures Form – CONFIDENTIAL"

2.3. NFN Health Services (also referred to herein as "**NFNHS**") will maintain, protect, and secure any information on an individual's vaccination status, and will not release such information unless that individual provides their consent or is otherwise required by law. Individuals who provide proof of vaccination are presumed, by the act of providing the proof, to be consenting to NFN having this information.

2.4. The NFNHS Community Health Nurse or designate will follow-up on employees, volunteers, children at an NFN afterschool program or an NFN childcare centre who have not submitted a disclosure form.

2.5. The NFNHS Community Health Nurse or designate will contact the Nipissing Secondary School Principal to follow-up on NSS employees or students who have not submitted a disclosure form.

3. Boosters

3.1. A Booster may be offered to individuals at higher-risk for serious outcomes associated with contracting COVID-19. The Booster is optional and does not change an individual's Fully Vaccinated status.

4. COVID-19 Vaccine Medical Exemption

- 4.1. To be medically exempt from a COVID-19 vaccine, individuals must provide a document issued by a physician or nurse practitioner confirming that they cannot receive a COVID-19 vaccination for a valid medical reason and the identifying the effective time period of the exemption. Medical exemptions are based on the Ontario Ministry of Health's list of approved medical exemptions.
- 4.2. A copy of this medical documentation must be provided with the disclosure form.
- 4.3. Individuals who are medically exempt from a COVID-19 vaccine as per above will not be required to complete a COVID-19 vaccination education program.

5. Requirement for Individuals with Unvaccinated Status

- 5.1. Individuals who are Unvaccinated and are not medically exempt from a COVID-19 vaccine must complete an NFN-approved COVID-19 vaccination education program prior to submitting the completed disclosure form.
- 5.2. Individuals who are Unvaccinated, whether or not medically exempt from a COVID-19 vaccine, must complete regular antigen point-of-care (rapid testing) for COVID-19 and provide a test result to the NFN Health Services Community Health Nurse based on frequency identified below.
- 5.3. Individuals who are Unvaccinated are responsible for making their own arrangements for rapid testing and for providing the necessary information to the NFN Health Services Community Health Nurse as soon as possible.
- 5.4. NFN Health Services provides rapid testing services during regular office hours. Advance notice is required to schedule an appointment as the number of tests that can be completed within a 1-hour period is limited.
- 5.5. The frequency of rapid testing is based on whether the individual works some or all of the time in a High-Risk Setting and may change depending on the status of the COVID-19 situation.
- 5.6. The frequency of rapid testing for COVID-19 applies as follows:

Position	Setting and Frequency
Registered Nurses, Registered Practical Nurses, Personal Support Workers, Home Makers, Seasonal Workers, Client Transportation Drivers	High-Risk Setting Twice per week and at least 48 hours between tests
Child Care and Early Child Development Workers	High-Risk Setting Twice per week with at least 48 hours between tests
Ojibway Women's Lodge (OWL) Staff	High-Risk Setting Twice per week with at least 48 hours between tests

NFN Medical Transportation Drivers	High-Risk Setting Twice per week with at least 48 hours between tests
All other NFN employees, NSS students, NFN Afterschool Participants, Childcare attendess, Volunteers	Low-Medium Risk Setting Once per week (every 7 –days)

6. NFN-Approved COVID-19 Vaccination Education Program

- 6.1. Completion of the NFN-approved vaccination education program is a requirement for Unvaccinated individuals who have not provided a documented medical exemption from a COVID-19 vaccine as per Section 4 of this policy.
- 6.2. NFN Health Services will be responsible for developing and delivering this education program with virtual and in-person options available.
- 6.3. Confirmation of completion of this program will be retained at NFN Health Services. In the case of NFN employees, a copy will be provided to NFN Human Resources.
- 6.4. The education program shall include information on COVID-19 vaccination that addresses:
 - How the COVID-19 vaccines work
 - Vaccine safety in the development of COVID-19 vaccines
 - Benefits of vaccination against COVID-19
 - Risks of not being vaccinated against COVID-19; and
 - Possible side effects of COVID-19 vaccination.

7. Compliance

- 7.1. Failure to comply with this policy and its requirements will be addressed as follows:
 - 7.1.1. An NFN employee that has not completed the COVID-19 vaccination education program as required will be notified of their non-compliance by phone or work email from NFN Health Services. The employee will be reminded to register and complete the education program.
 - 7.1.2. A Nbsiing Secondary Student that has not completed the COVID-19 vaccination education program as required will be notified of their non-compliance by the NSS Principal or designate. The student will be reminded to attend and complete the COVID-19 vaccination education program.
 - 7.1.3. Any other individual to whom this policy applies and who has not completed the COVID-19 vaccination education program as required will be notified of their non-compliance by phone or email from the NFN Community Health Nurse or designate. The individual will be reminded to register and complete the education program.
 - 7.1.4. An NFN employee that has not provided a negative COVID-19 rapid test result as per the employee’s applicable frequency schedule will be notified of their non-compliance by phone or work email from NFN Health Services.

The employee will be reminded to obtain a test and submit a negative test result and of the testing schedule applicable to their position.

- 7.1.5. A NSS Student that has not provided a negative COVID-19 rapid test result as per the applicable frequency schedule will be notified by the NSS Principal or designate of their non-compliance. The student will be reminded to obtain a test and submit a negative test result and of the testing schedule.
- 7.1.6. Any other individual to whom this policy applies and who does not provide a negative COVID-19 rapid test result as and when required by the applicable frequency schedule under this policy will be notified of their non-compliance by phone or email from the NFN Community Health Nurse. The individual will be reminded to obtain a test and submit a negative test result and of the testing schedule applicable to their circumstances.
- 7.2. If an NFN employee fails to comply after receiving a reminder under 7.1.1 or 7.1.4, or if the employee repeatedly fails to comply with the requirements under this policy, the matter will be referred to NFN Human Resources. The employee may be subject to discipline per the NFN Human Resources Management Policy.
- 7.3. If a student fails to comply after receiving a reminder under 7.1.2 or 7.1.5, or if the student repeatedly fails to comply with the requirements under this policy, the matter will be referred to the NSS Principal. The NSS Principal or designate will address the matter and may consider placing the student on remote learning or enacting other appropriate discipline processes as per NSS policy.
- 7.4. If any other individual to whom this policy applies fails to comply after receiving a reminder under 7.1.3 or 7.1.6, or if the individual repeatedly fails to comply with the requirements under this policy, their relationship with NFN may be suspended or restricted, as appropriate in the circumstances. This may include, but is not limited to, suspension of volunteer activities, restrictions from entering NFN premises, and other restrictions as NFN deems appropriate, in its discretion.

8. Notice of this Policy

- 8.1. Notice to be posted in the NFN Employee Newsletter and NFN Communications SharePoint site.
- 8.2. Policy to be distributed to all NFN employees and NFN businesses as applicable or upon request.

REFERENCES

1. [RESOURCE GUIDE \(gov.on.ca\)](#)
2. [Reopening Ontario | Ontario.ca](#)

3. [O. Reg. 364/20: RULES FOR AREAS AT STEP 3 AND AT THE ROADMAP EXIT STEP \(ontario.ca\)](#)
4. [Ontario Makes COVID-19 Vaccination Policies Mandatory for High-Risk Settings | Ontario Newsroom](#)

Appendices

- i. Nipissing First Nation COVID-19 Vaccination Status Disclosure Form



NFN COVID-19 VACCINATION STATUS DISCLOSURE FORM

NFN employees, volunteers, Nbisiing Secondary School students, children attending NFN childcare centres or NFN afterschool programs who are subject to the Nipissing First Nation COVID-19 Vaccination Status Disclosure Policy, are required to complete and submit this form to NFN Health Services on or before **October 1, 2021**. Forms can be mailed, dropped off, faxed, or emailed as per Section 2.2 of the policy.

Last Name	First Name	Date of Birth: _____/_____/_____ Month Day Year
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This form is being completed for an individual that is:

- An NFN Employee; if NFN employee, please indicate position and department below
 Employee Position: _____
 Employee Department: _____
- A Nbisiing Secondary School Student
- A volunteer OR an individual attending an NFN afterschool program or an NFN childcare centre

Please read and check all that apply:

- I have read the Nipissing First Nation COVID-19 Vaccination Status Disclosure Policy.
- I have attached proof of Fully Vaccinated status with this form.
- I am providing medical documentation from a physician or nurse practitioner that confirms a medical reason for exemption from a COVID-19 vaccine and includes the time period for which this is in effect. I understand that I am required to participate in a rapid testing program.
- I am consenting that NFN Health Services access my health records to obtain proof of full vaccination status on my behalf including my record contained in Mustimuhw Information System(cEMR) and the provincial COVax System. I have added my health card number for this purpose.
 Health Card #: _____ - _____ - _____ - _____
- I am not providing proof of Fully Vaccinated status or a medical exemption. I have completed the NFN-approved vaccine education program and understand that I must participate in a rapid testing program.

Signature

Date (Month/Date/Year)