

### BACKGROUND

- Despite the numerous past, present and ongoing COVID-19 risk mitigation and health and safety measures in place, both in our Division and within our communities, the COVID-19 pandemic continues to put strain on our education and health care system as well as the entire community. COVID-19 presents a health risk for staff and students, and it is the responsibility of all school divisions to provide a safe working and learning environment for both staff and students.
- Provincial Government and Health Officials have consistently advised that immunization against COVID-19 is the most effective means to prevent the spread of COVID-19, prevent outbreaks and preserve in person learning.
- The Division recently received a joint letter from the Ministers of Health and Education encouraging a mandatory proof of vaccination or negative test policy be implemented by all School Divisions.
- As a result of our responsibilities to those we serve and employ, including our students under the age of 12 who are unable to be immunized at this point in time, the Division will require all adults entering Division buildings (including, but not limited to: employees, contractors, practicum students, on-site partners, volunteers, parents, guardians and members of the public) as well as contracted bus drivers to be fully vaccinated against COVID-19, or alternatively, comply with testing requirements as provided in this Administration Procedure. This Administration Procedure does not apply to Division students.
- The Division recognizes and will act at all times in accordance with its obligations pursuant to the *Education Act*, the *Alberta Human Rights Act*, the *Occupational Health and Safety Act, Regulation and Code* and advice from the Office of the Chief Medical Officer of Health.

### DEFINITIONS

- A. “Fully Vaccinated” means:
- a. having received two doses of a vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series, or one dose of a vaccine considered valid by Health Canada in a one dose COVID-19 vaccine series; and,
  - b. having fourteen days elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one dose vaccine series.

- B. “Partially Vaccinated” means:
- a. having received one dose of a vaccine considered valid by Health Canada in a two dose COVID-19 vaccine series; or,
  - b. have received the dosage series (typically two doses) but fourteen days have not elapsed since the date upon which the person received the second dose of the COVID-19 vaccine considered valid by Health Canada of a two dose series, or one dose of the COVID-19 vaccine considered valid by Health Canada in a one dose vaccine series.
- C. “Unvaccinated” not being in compliance with either Definition A or B as noted above.
- D. “Employee” means any individual employed by the Medicine Hat Catholic Board of Education (the “Division”).

## PROCEDURES

1. All Division Employees **must declare** their vaccination status to Human Resources by **November 8, 2021** as Fully Vaccinated, Partially Vaccinated or Not Vaccinated
  - a. Employees who are Fully Vaccinated or Partially Vaccinated shall concurrently provide proof of vaccination status by providing Human Resources with a copy of their QR code that verifies their COVID-19 vaccine record, as part of their formal attestation of their vaccination status. A QR code can be obtained at <https://covidrecords.alberta.ca/home>.
  - b. Employees must update their vaccination status with the Division if changes occur.
  - c. Subject to the exemptions set out below, all **new Employees hired** on or after **October 25, 2021** will be **required to be Fully Vaccinated** prior to their first day of work and show proof thereof through the provision of a QR code that verifies their COVID-19 vaccine record.
  - d. Where applicable, equivalent proof of vaccination documents from another Canadian Province or Territory or the Canadian Armed Forces will be accepted.
2. Employees must present one of the following to Human Resources beginning **December 13, 2021**:
  - a. Acceptable proof of full vaccination (if not already provided); or
  - b. Acceptable proof of a negative COVID-19 test completed within the previous 72 hours of the commencement of a “workday” or “shift” of the employee.
    - i. Proof of a negative COVID-19 test consists of a report demonstrating a negative result of a Health Canada approved rapid antigen, rapid PCR or lab-based PCR test—the report must clearly state the type of test, time of sample collection, clear indication of a negative result and laboratory or pharmacy that completed the test, if applicable.
    - ii. The cost of the test and the time required to complete a test will be the sole responsibility of the employee. For further clarity the Division shall not be responsible in any way for the costs of testing.

- iii. Employees must participate in regular rapid testing twice per week, no more than 72 hours prior to the time of their scheduled shift.
- iv. COVID-19 diagnostic testing is an eligible expense and can be submitted to your [ASEBP Health Spending Account](#), if applicable.
- v. If an employee test results come back positive, they are required to book themselves absent (sick) and request a substitute if required in the Automated Dispatch System.
- vi. In the event that an Employee tests positive in response to a COVID-19 Rapid Antigen Screening test, the Employee must:
  - submit to mandatory COVID-19 PCR testing as soon as possible but no more than 48 hours following confirmation of the results of the Rapid Antigen Screening test, and as directed by the Division;
  - inform the Division through Human Resources;
  - isolate until the results of the COVID-19 PCR test are confirmed; and,
  - provide proof of a negative COVID-19 PCR test prior to attending at any Division property.
- vii. Self-produced documentation of a negative result is not sufficient evidence.

3. Any employee that does not comply with either proof of full vaccination or acceptable proof of a negative COVID-19 test pursuant to Sections 2 (a) or (b) above, is considered non-compliant and the Division will review each non-compliant circumstance in its own context and circumstances, and at its discretion will determine available options including but not limited to:

- a. Leave of Absence without pay and benefits;
- b. Reassignment or modification of duties that would involve no or minimum in-person contact with students and colleagues, understanding that the Division’s ability to consider such alternative arrangements is likely very limited in most cases; and
- c. Conclusion of employment.

**DISCLOSURE AND TESTING REQUIREMENTS – NON-EMPLOYEES**

- 4. As of December 13, 2021 all adults entering a Division building as well as contracted bus drivers must be fully vaccinated. If not fully vaccinated, they must provide proof of a negative COVID-19 rapid antigen screening test or PCR test completed no more than 72 hours prior to the time they are entering the Division building or the start of their bus driving shift for the Division. Proof of full vaccination or in the alternative a negative COVID-19 test, will be required/permitted in the same form and pursuant to the same rules as applicable to employees of the Division outlined in procedures 1 and 2 above.
- 5. Costs of all testing shall be paid by the individual required to produce the test results. For further clarity, the Division shall not be responsible in any way for the costs of testing.



## EXEMPTIONS

6. The Division recognizes its responsibilities and duties pursuant to the *Alberta Human Rights Act*. If an Employee is unable to be vaccinated due to a protected ground as defined by the *Act*, the Division will consider requests for exemption and reasonable accommodation to the point of undue hardship.
7. Any employee seeking a Human Rights (ie. medical or religious) exemption from compliance with this Administrative Procedure should notify Human Resources as soon as possible. Human Resources will advise any employee inquiring on applying for an exemption the required information to do so. All employees considering applying for an exemption should understand that this Administrative Procedure is purposely designed to provide an alternative for employees not able or wishing to be fully vaccinated, to remain compliant with this Administrative Procedure by providing the required regular COVID-19 negative test result. As a result, it is anticipated in most cases that employees that have a proven legitimate [Human Rights exemption](#) to vaccination will be reasonably accommodated by participating in the regular COVID-19 testing procedures outlined above in this Administrative Procedure.

## NON-COMPLIANCE

8. Any failure to comply with this Administrative Procedure by an Employee, including the refusal to disclose vaccination status and/or the provision of proof of vaccination status, compliance with applicable testing requirements, or the provision of false or misleading information in any regard, may result in administrative or disciplinary action up to and including termination of employment.
9. Any non-employee adults who fail to comply with any part of this Administrative Procedure, including being found to have falsified vaccination or test results, will be considered to be in non-compliance with this Administrative Procedure and must immediately leave Division property.

## SUPPORT FOR VACCINATION

10. If operationally feasible and with the permission of their immediate supervisor, employees may be released on work time to be vaccinated on-duty without any loss of compensation or the requirement to use sick leave banks to a maximum of three (3) hours for each dose.

## CONTINUED COMPLIANCE WITH ALL HEALTH AND SAFETY PRECAUTIONS

11. All employees are expected and required to continue to comply with all applicable health and safety measures to reduce the hazard of COVID-19, including but not limited to compliance with [screening protocols](#), wearing a mask or face covering, using provided



PPE, maintaining appropriate physical distancing and self-monitoring for potential COVID-19 symptoms daily prior to attending the workplace.

#### PROTECTION OF PRIVACY


12. The Division will only collect, use and disclose any personal information regarding any individual subject to this Administrative Procedure in accordance with the *Freedom of Information and Protection of Privacy Act* (“FOIP”).
13. Information regarding any individual’s vaccination status, including but not limited to any individual’s Alberta Health COVID-19 Immunization Record has been collected pursuant to Section 33(c) of *FOIP*, will be kept confidential, stored in a secure location, and access and disclosure limited to that permissible by *FOIP*.

#### PREVENTION OF HARASSMENT, BULLYING OR DISCRIMINATION

14. Harassment, bullying or discrimination of any type against individuals based on their vaccination status, compliance with this Administrative Procedure or any other reason will not be tolerated. Employees experiencing harassment, bullying or discrimination are encouraged to review [Administrative Procedure 170](#).

#### ADMINISTRATIVE PROCEDURE REVIEW

15. Pursuant to the current background and context set out at the beginning of this Administrative Procedure, this Administrative Procedure is considered temporary due to the evolving and dynamic nature of this public health matter, and ongoing direction, recommendations and advice from public health officials and the Alberta Education. As a result, this Administrative Procedure will be periodically reviewed (at least every 6 months) and updated/amended as deemed necessary.

<b>Reference:</b> <a href="#">COVID-19 Vaccination Information ASEBP</a> <a href="#">Human Rights Exemption</a> <a href="#">COVID-19 Daily Screening</a> <a href="#">Administrative Procedure 170</a>	<b>Approved:</b> 
	<b>Date Approved:</b> October 25, 2021
	<b>Reviewed or Revised:</b>

*Note: References shall be updated as required and do not require additional approval*

