

## **RHRA Recommendation on Retirement Home Staff and Volunteer COVID-19 Immunization Policy**

Effective July 29, 2021, it is recommended that retirement homes implement a policy on staff and volunteer COVID-19 immunization. In developing their policies, retirement homes should consider the following recommendations.

### **Application of the policy**

Under the *Retirement Homes Act, 2010*, retirement home staff includes every person who works or provides services at the home, as an employee of the licensee, pursuant to a contract or agreement with the licensee, or pursuant to a contract or agreement between the licensee and an employment agency or other third party. This may include front-line workers, management, food-service workers, service providers under contract with the retirement home (including temporary staff from employment agencies), basic aides and guest attendants. Under the *Retirement Homes Act, 2010*, volunteer means a person who works in or supplies services to the home, but who is not part of the staff of the home and who does not receive a wage or salary for the services or work that the person provides in the home.

### **Policy on COVID-19 immunization**

Every licensee should implement a written policy on COVID-19 immunization aimed at supporting education and informed choice about COVID-19 vaccination and should ensure that the policy is complied with.

### **Contents**

RHRA recommends the following framework for a staff and volunteer immunization policy; however, licensees may develop their own policy.

Retirement home staff and volunteers must provide **one** of the following to the licensee:

1. Proof of COVID-19 vaccine administration as per the following requirements:
  - a) if the individual has only received the first dose of a two-dose COVID-19 vaccination series approved by Health Canada, proof that the first dose was administered and, as soon as reasonably possible, proof of administration of the second dose; or
  - b) if the individual has received the total required number of doses of a COVID-19 vaccine approved by Health Canada, proof of all required doses
2. Written proof of a medical reason, provided by either a physician or registered nurse in the extended class, that sets out:
  - a) that the person cannot be vaccinated against COVID-19; and
  - b) the effective time period for the medical reason
3. Proof that the individual has completed an educational program approved by the licensee that addresses, at a minimum, all of the following:
  - a) how COVID-19 vaccines work
    - i. vaccine safety related to the development of the COVID-19 vaccines
    - ii. the benefits of vaccination against COVID-19
    - iii. risks of not being vaccinated against COVID-19
    - iv. possible side effects of COVID-19 vaccination

If the effective time period of a medical reason has expired, the licensee should ensure that the individual provides proof of vaccination or proof that the individual completed an educational program.

For individuals who have received the first dose of a two-dose COVID-19 vaccination series and have provided proof, licensees should consider the person to have met the requirements of the policy until such time as they are eligible for a second dose. At that time, the licensee should collect proof of the individual's second dose, or proof of a medical reason for not receiving it, or proof that the individual has completed an educational program. Every licensee should have a process in place for following up with individuals who have not yet received a second dose.

RHRA recommends seeking educational resources from the following organizations:

- Health Canada
- Government of Ontario
- Public Health Ontario
- Ontario Ministry of Health
- Ontario Ministry of Long-term Care
- Local Public Health Units
- Ontario Retirement Communities Association (ORCA)
- AdvantAge Ontario

Note that licensees are not limited to the use of educational materials from the above organizations.

### **Alignment with Applicable Legislation**

In developing and implementing immunization policies, retirement homes are reminded to ensure their policies align with their responsibilities under applicable legislation including (but not limited to):

- The [Retirement Homes Act, 2010](#) and any guidance provided by the Retirement Homes Regulatory Authority on how to achieve compliance with the Act.
- Direction issued by the Chief Medical Officer of Health, including [Directive #3 for Long-Term Care Homes](#), as well as the [Retirement Homes Policy to Implement Directive #3](#).
- The [Personal Health Information Protection Act, 2004](#) with respect to consent to the collection, use, and disclosure of personal health information and record keeping in the event that retirement homes develop an immunization policy that includes the collection of personal health information (e.g., test results, immunization status).

Retirement homes should also consider any collective agreement issues related to immunization and comply with all applicable employment and human rights legislation including Ontario's *Human Rights Code*.

Retirement homes that have questions or concerns on how to meet their obligations are encouraged to obtain legal advice.

### **Communication of policy**

Every licensee should ensure that the policy on COVID-19 immunization is communicated to all retirement home staff and volunteers and a copy of the policy – either in hardcopy or electronic format – is made available to residents and their substitute-decision makers free of charge. An information sheet prepared by the RHRA on immunization will be posted on the RHRA website.