

## **A. Background**

This version, dated, May 11, 2022 replaces the original version of this policy, dated, September 1, 2021.

Policies, directives, and mandates related to COVID vaccination will be modified from time to time as the pandemic progresses. This policy is updated to reflect the current requirements of learners in FHS education programs who have clinical placements.

McMaster University has mandated COVID vaccination for all people attending university property as outlined in McMaster's Policy related to COVID vaccination. McMaster's Vaccine Policy has been paused as of the 2022 spring and summer terms. This pause does not alter the FHS Policy Regarding Submission, Verification, and Sharing of COVID-19 Vaccination Status for Learners in Clinical and Workplace-Based Placements which continues to be in effect.

Learners in health professions programs and other Faculty of Health Sciences (FHS) education programs participate in required placements in healthcare and education organizations. Additionally, organizations with which learners are placed for clinical and other workplace-based learning ("Placement Organizations"), may have their own vaccination requirements.

Currently, McMaster's FHS collects information regarding any mandatory immunization requirements from our learners on behalf of Placement Organizations. This ensures that learners do not have to repeatedly submit the same records to multiple organizations each time they change placements. Placement Organizations have specific base requirements which are generally met via FHS's surrogate screening process to enable our Health Screening Office to screen immunization requirements on behalf of their organizations. Proof of vaccination with a full series of a COVID-19 vaccine according to National Advisory Committee on Immunization (NACI) guidelines is a mandatory requirement and forms part of the FHS health screening requirements for clinical placements.

## **B. Scope**

This policy applies to the following learners registered or enrolled in a Faculty of Health Sciences program:

1. Learners in the following health professions programs (Child-Life; Graduate Nursing; Undergraduate Midwifery; Occupational Therapy; Physician Assistant; Physiotherapy; Postgraduate Medicine; Speech Language Pathology; Undergraduate Medicine; Undergraduate Nursing); and,
2. Learners in the i-Biomed, BHSc, and Graduate Midwifery Programs who are involved in courses that include learning in the clinical environment.

### C. Process of Submission, Verification, and Sharing of COVID Vaccination Status

1. Appropriate proof of COVID-19 vaccination (“vaccination”) will be defined by McMaster University (“operational definition”).
2. Submission:
  - a. Postgraduate Medicine incoming learners will submit to the Health Screening Office, original documentation of a full series of a COVID-19 vaccine via MedSIS or with their Postgraduate Medical Education Health Screening Record before July 1<sup>st</sup> of their incoming year or, if a visiting Postgraduate Medicine elective learner, Fellow or Resident, at least 8 weeks prior to their start date at McMaster.
  - b. All other incoming learners outside of Postgraduate Medicine will submit to the Health Screening Office, original documentation of full series of a COVID-19 vaccine with their FHS Year One Health Screening Record by July 15<sup>th</sup> of their incoming year.
  - c. All Undergraduate Medicine visiting elective learners will submit required COVID-19 vaccination documentation as outlined on the Association of Faculties of Medicine of Canada (AFMC) Portal.
  - d. Programs will advise the Health Screening Office of learners who are returning from a leave of absence. The Health Screening Office will contact the learner for any documentation, including COVID-19 vaccination receipts, required to meet current FHS immunization requirements prior to the learner’s return.
  - e. Learners will submit proof of vaccination as outlined by the Health Screening Office, including the process, formatting and deadlines for submissions.
  - f. Learners may submit proof of vaccination via mail, in person or to a password-protected system that is only accessed by the staff and healthcare providers of the Health Screening Office for the purpose of verifying immunization requirements in the FHS.
  - g. Learners who are seeking exemptions from vaccination should refer to (4) “Exemptions” below.
3. Verification:
  - a. Proof of vaccination will be reviewed by Health Screening Office staff, including administrative and health professional staff to verify that documents demonstrate full vaccination to COVID-19 based on the operational definition.
  - b. Health Screening Office staff and health professionals may contact learners for additional information or documentation to support the verification process.
4. Exemptions:
  - a. Learners may seek an exemption to vaccination to COVID-19 based on human rights grounds as covered in the Ontario Human Rights Code.

- b. Requests for “medical” exemptions will be submitted to the FHS Health Screening Office using the *FHS Health Professional Student COVID-19 Vaccine Medical Exemption Request* form. These requests will be assessed by health professionals in the Health Screening Office. Learners may be asked to submit additional information to substantiate their request.
    - i. The Health Screening Office will notify the learner if the learner has received a medical exemption and the duration of the current exemption. Learners may need to supply subsequent updates if the exemption expires while they are still registered or enrolled in a program with clinical or other workplace-based placements where COVID vaccination is required.
    - ii. Medical exemptions must be valid for the entire duration of each placement; therefore, a student may need to update their medical exemption sooner than the designated expiry date. It is a student’s responsibility to ensure their medical exemption is valid and current with the Health Screening Office. Failure to do so may result in a delayed, interrupted, or missed placement.
  - c. Requests for all other (“non-medical”) exemptions under the Ontario Human Rights Code will be submitted using the same process as the broader University. These requests will be assessed using the process defined for the broader University; and learners will be notified about the status of their exemption request through the same process as the broader University.
    - i. Learners should contact their education program or the McMaster FHS Health Screening Office for direction on how to submit a “non-medical” exemption request.
    - ii. Learners who are granted a “non-medical” exemption will provide their exemption notification to the Health Screening Office using the same submission process as proof of vaccination.
  - d. Learners who are seeking an exemption from vaccination must begin the process well in advance of the submission deadline so as to allow ample time for review of the request which may take several weeks and may result in a request for additional information. Approved exemptions must be in place and submitted with the learner’s Health Screening Record by the applicable due date as outlined in Section C Subsection 2 a, b, c, or prior to returning to a Program following a leave of absence.
5. COVID “Vaccination Status”:
- a. Learners will receive one of four Vaccination Statuses by the Health Screening Office. These statuses will be communicated to the learner’s education program for the purpose of facilitating clinical or other workplace-based placements with Placement Organizations.

- b. Based on material submitted and the outcome of the verification process, learner status will be one of:
  - i. “Cleared” – learner has provided proof that meets the current operational definition of “fully vaccinated”
  - ii. “Exemption (medical)” – learner has provided documentation that meets the requirements of a medical exemption as determined by the FHS Health Screening Office
  - iii. “Exemption (Non-medical)” – learner has provided documentation from McMaster University verifying that they have received a non-medical exemption from the University
  - iv. “Not Cleared” – the learner has not met one of the above criteria, including:
    - 1. Has not submitted proof of full vaccination, including only partially vaccinated and/or insufficient time following final dose; and,
    - 2. Has not received an exemption.
- c. Learners with a “Not Cleared” Vaccination Status with respect to COVID vaccination requirements will cause a “Not Cleared” overall Health Screening status.

#### 6. Sharing of COVID Vaccination Status:

##### Confidentiality Commitment.

The University will protect personal information and handle records in accordance with its policies, including but not limited to: Privacy Governance and Accountability Framework, Privacy Breach Protocol, Policy for the Handling of Personal Information, Policy for the Handling of Personal Health Information, and the Policy on Access to Personal Health Information. The University will also comply with its obligations in accordance with the Freedom of Information and Protection of Privacy Act and the Personal Health Information Protection Act.

The University will ensure that access to any information provided under this Policy is limited to those who require access on a “need to know” basis only to achieve the purposes of this Policy. This includes persons at the student’s placement site as described in paragraph 6(e) below. This information will be securely stored and will only be used for the purpose of facilitating placements in partner healthcare institutions where vaccination is required to protect patients, visitors, and workers within those institutions and the communities they serve. In the instance that the broader University is required to collect this data to be compliant with, among others requirements, but including legislation, directives, and/or mandates regarding COVID-19 vaccination requirements, the information described herein will be similarly shared with appropriate parties (or individuals and offices) within the University. The University will

delete the information as soon as possible after the purposes for which it was collected are fulfilled.

#### Procedures for Sharing Vaccination Status.

- a. The Health Screening Office will share the Vaccination Status (from #5 above) with the learner's education program through dedicated administrative staff identified in each education program for the purposes of handling health screening information. Information that was submitted to the Health Screening Office or McMaster University to determine the Vaccination Status will not be shared with learners' education programs or placement coordinators unless required by law, orders or directives, see 6(g) below. In the case of non-medical exemptions, information provided to the University to determine eligibility for this exemption will not be shared with the FHS Health Screening Office or education program.
- b. When required, the Health Screening Office will share the Vaccination Status (from #5 above) with McMaster University Technology Services (UTS) who oversee the McMaster Proof of Vaccination Reporting Tool (MacCheck) for the purposes of uploading the Vaccination Status to the university Tool to reduce duplication of uploading the same material and information.
- c. Learners' COVID Vaccination Status will be used by Education Program "Placement Coordinators" to select placement sites for learners that best match learners' Vaccination Status. Placement Coordinators may also need to consult with education program leaders to optimize accommodations for learners with an approved exemption. Normally, this would be done in consultation with the learner.
- d. Education Program Placement Coordinators will liaise with Placement Sites to determine which sites will accept learners with various Vaccination Statuses to facilitate placements of all learners. Sites will be assigned for placements to optimally accommodate the Vaccination Status across all learners.
- e. Placement Sites determine the eligibility for learner presence on site and participation in activities at the Placement Site, including Vaccination Status. Placement Sites will also determine the disposition of learners following contact with individuals with COVID or as part of outbreak management depending on the learner's Vaccination Status.
- f. The learner's Vaccination Status will only be shared with individuals at the Placement Site who require the information to safely facilitate learner placement. This may include, among others, the Placement Site Coordinator, offices that facilitate credentialing, and health & safety offices. When necessary, the learner's supervisor may also be notified if the supervisor is required to actively contribute to accommodations for learners with exemptions.

- g. Provincial laws, orders, or directives may require the Placement Organization to have copies of learners' proof of vaccination. Where this is a requirement of the Placement Organization by law, order, or directive, McMaster's FHS Health Screening Office will provide copies of proof of vaccination to the Placement Organization's Occupational or Employee Health Office, Credentialing Office, and/or Learners' Affairs Office, depending on who is the normal holder of confidential student information for the given Placement Organization.
- h. Learners who have questions about how the Placement Site manages information about their Vaccination Status can seek clarification about this from the following: Placement Site Occupational/Employee Health Office, credentialing office, or education office; or your Education Program leadership.
- i. Learners should be aware that their Vaccination Status may be evident to others as a result of required accommodations. Learners are advised to apprise themselves of a Placement Site's privacy policies.

#### **D. Implications of Vaccination Status**

1. Learners must meet the vaccination requirements of each jurisdiction in which they are present. Where learners are concurrently under more than one jurisdiction, they must meet the requirements of all jurisdictions that concurrently apply. For example, learners that are both at a McMaster site and doing simulated clinical learning are under the jurisdiction of McMaster University's COVID vaccination policy AND the FHS Vaccination policy. The processes and outcomes apply from both policies concurrently. Likewise, a learner on a clinical placement at a Placement Organization are under the jurisdiction of the Placement Organization's COVID vaccination policy AND the FHS Vaccination policy.
2. The University will make efforts to provide reasonable accommodations to learners regardless of, and with respect to, their Vaccination Status.
3. Learners with an "Exemption" Vaccination Status must be aware that Placement Site policies may preclude them from securing a clinical placement in a timely manner. The University will make every reasonable effort to secure a Placement but completion of program degree requirements may be interrupted, delayed, or not possible.
4. Learners with a "Not Cleared" Vaccination Status can not participate in clinical or workplace-based learning placements, including simulation-based learning activities. Each Education Program will determine the eligibility of a learner to be admitted to or continue in their program with a "Not Cleared" Vaccination Status. This determination is based on several considerations, including but not limited to, university policies and practices, and the ability to successfully participate in all aspects of the program.
5. Placement Sites determine eligibility of learners to be present and to participate in activities at the Placement Site. Placement Sites may alter their eligibility requirements

at any time, including in response to broader pandemic conditions such as community epidemiology and health system status; and in response to local pandemic conditions, including case contact and outbreak management. Learners who were once eligible to participate in activities on site may lose that eligibility, temporarily or permanently, dependent on their Vaccination Status. Eligibility may change with minimal notice. As such, Education Programs may have difficulty accommodating learners in a timely manner under some circumstances. This may result in unexpected delays or pauses in education and program progress.

6. Placement Sites determine the conditions by which learners may be present on site and may participate in activities at the Placement Site. Placement Sites may require learners who do not have a “Cleared” Vaccination Status to undergo additional infection prevention and control, surveillance, or other public health measures, including regular antigen testing. Placement Sites will determine the requirements, including frequency, of such interventions and learners are obligated to comply with the requirements conveyed to them if they wish to be present on site and participate in activities to which enhanced requirements apply.
7. Learners who are unable to participate in the required activities that satisfy the degree requirements of their education program, particularly as a result of their Vaccination Status, will have the following options. Options available to each learner may be limited by University and/or Program policies. Learners should consult with their Education Program to understand which options are available to them.
  - a. Endeavour to change their Vaccination Status by becoming fully vaccinated (“Cleared”) and/or by seeking an exemption that would enable them to continue participation in their program.
  - b. Determine if other accommodations are available, including other Placement Sites, remote or virtual access options, alternatives to clinical or other workplace-based learning, etc. Accommodations, particularly in the form of alternatives to clinical or other workplace-based learning, are often limited to satisfy the learning and assessment of objectives and competencies that are typically associated with these settings. Education Programs will not waive any key objectives or competencies to accommodate a learner’s Vaccination Status.
  - c. Learners may choose to pause their program by taking a leave of absence. This may allow time for pandemic conditions to change such that the learner’s Vaccination Status is no longer limiting or can be accommodated to enable them to continue in their program.
    - i. Education Programs determine the implications of taking a leave with respect to when and how learners can re-enter the program, and the total duration of the leave that is compatible with maintaining knowledge and skill required to continue at the stage of the program at which the learner went on leave. Learners may be required to repeat aspects of the

program at the Education Program's discretion, particularly for longer leaves.

- ii. Education Programs may also request that learners return, withdraw, or may withdraw learners if leaves are of a duration that are felt to be incompatible with program return, particularly where the learner is unable to articulate a plan for a timely return to the program.
  - iii. Where appropriate, Education Programs should follow existing policies or practices around adjudicating leaves of absence.
- d. Learners may withdraw from the program. Policies regarding withdrawal, including with respect to transcripts, tuition, fees, etc. will apply.

#### **E. Policy Implementation Accountability**

1. The Vice-Dean, Education of the Faculty of Health Sciences is responsible for the oversight of the implementation of this policy.
2. Any questions or concerns about the administration of this policy can be directed to your education program leaders, usually the Associate or Assistant Dean, and/or Program Manager or Coordinator. Questions or concerns may also be directed to the Vice-Dean, Education.
3. Students who wish to Appeal any findings or processes resulting from this policy may access the normal University Appeal processes where such processes are available.