

## **SECTION 9**

### **OCCUPATIONAL HEALTH & SAFETY**

#### **9.09 COVID-19 VACCINATION INFORMATION AND TESTING POLICY**

**AUTHORITY:** OCCUPATIONAL HEALTH AND SAFETY SECTION  
PUBLIC SERVICE COMMISSION

**ADMINISTRATION:** PUBLIC SERVICE COMMISSION

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## **1. POLICY**

- 1.01 The Government of Prince Edward Island, as the Employer, is committed to providing all employees with a safe, healthy, and productive work environment and to protecting employees and clients from the risk of infection from, and complications associated with, the SARS CoV-2 virus, the cause of COVID-19.
- 1.02 Vaccination is recognized as the cornerstone for preventing or decreasing the effects of COVID-19 for those at high risk of serious illness or death from COVID-19 infection and related complications.
- 1.03 The Government of PEI and its workers have a duty to actively promote, implement and comply with COVID-19 immunization and testing recommendations in order to decrease the risk of infection and complications.
- 1.04 The Government of PEI is committed to complying with the recommendations of the Chief Public Health Office (CPHO) as it relates to COVID-19.
- 1.04 The Government of PEI has developed this policy in adherence with the CPHO Vaccination Information and Testing Policy Order for Front Line Public Service Providers ("The Order").

## **2. APPLICATION**

- 2.01 This Policy applies to any Civil Service employee who performs work in a correctional centre, provincial group home, public school workplace, or other facility as defined by the Order, where there is prolonged exposure to vulnerable and/or medically complex populations. Where applicable, the policy also applies to volunteers, students, interns and contractors.

## **3. PURPOSE AND SCOPE**

- 3.01 The Purpose of this Policy is to protect clients and employees from COVID-19 by preventing the transmission of SARS CoV-2 and decreasing the risk of COVID-19.
- 3.02 This Policy is established by the Employer to set out expectations and clear guidelines for appropriate behaviour in accordance with this Policy and to provide the consequences for non-compliance.

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3.03 This Policy provides employees with guidance on the requirements to be fully immunized against the COVID-19 virus or submit to regular rapid antigen testing at the worksite.

3.04 Violation of this Policy may be grounds for disciplinary action, up to and including, dismissal from employment.

#### 4. BACKGROUND

There is an immediate risk to persons who receive care or services within schools, correctional centres and group homes where populations being served may not be fully immunized against COVID-19 infection and are more vulnerable and medically complex than the general populations, and therefore are more susceptible to infection and severe outcomes from COVID-19. Employees who are not fully vaccinated and who work in these facilities are at a higher risk of importing COVID-19 into those settings.

To protect the health and safety of employees, some providers may implement COVID-19 rapid antigen screening tests. Rapid antigen tests (also known as rapid point-of-care tests) do not replace important public health measures such as vaccination, symptom screening, physical distancing, masking, and frequent hand washing. Rapid antigen tests are an additional measure that providers can use to screen for COVID-19 and protect the health and safety of employees and clients.

#### 5. DEFINITIONS

5.01 The following terms, where used in this Policy, shall have the meaning as assigned to them below:

**“Congregate Setting”** A range of facilities where people (most of whom are not related) gather and use shared spaces. For the purpose of this policy, this is defined as correctional centres, provincial group homes, public schools, or other facility as defined by the Order.

**“Employee”** means all full time, part time, temporary, casual, and seasonal employees of the Civil Service (and any others as defined in the Civil Service Act).

**“Employer”** means the Government of Prince Edward Island (as defined in the Civil Service Act).

**“Fully Vaccinated”** 14 days after receiving the second of a 2-dose Health Canada approved vaccine series, or the first of a 1-dose Health Canada

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approved vaccine series, or 14 days after receiving an mRNA vaccine following a one or two doses of a non-Health Canada approved vaccine.

**“Employee(s)”** Employees who access the congregate setting and who are eligible to be vaccinated with a Health Canada approved vaccine.

**“Partially Vaccinated or Unvaccinated”** An employee who is not 14 days past receiving the second dose of a 2-dose Health Canada approved vaccine series or the first of a 1-dose Health Canada approved vaccine series, or 14 days past receiving one dose of an mRNA vaccine in addition to 2 doses of a non-Health Canada approved vaccine.

**“Point of Care Test (POCT)”** A screening test that can identify potential positive cases of COVID-19.

**“Polymerase Chain Reaction (PCR) Test”** A highly sensitive molecular test used to diagnose people infected with the SARS-CoV-2 virus.

**“Presumptive Positive”** A positive result on a point-of-care screening test (POCT) is considered a presumptive positive. A presumptive positive POCT must be confirmed with a diagnostic, lab-based PCR test.

**“Prolonged Exposure”** A period of 15 cumulative minutes over 24 hours in close proximity (within 2 meters) of individual receiving service.

**“Rapid Antigen Test”** A type of rapid COVID-19 screening test that detects specific proteins on the surface of the virus.

**“Self-Test”** A test that can be administered to oneself.

## 6. PROCEDURES

### 6.01 Immunization Record

- (a) Fully immunized employees working in congregate settings with vulnerable populations (i.e. clients, students and children) will submit to the Employer their immunization record for COVID-19 to ensure their compliance with the immunization requirements.
- (b) The Employer will verify the immunization record and enter the vaccination information into Peoplesoft on the employee’s personnel record. The immunization record will subsequently be destroyed once the information is recorded electronically.

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- (c) For partially vaccinated or unvaccinated employees, they will adhere to the rapid antigen testing requirements of the Employer in order to continue working in the facility.

#### 6.02 Testing Eligibility

- (a) Rapid antigen tests are to be used to screen employees who are not fully vaccinated, who are accessing the congregate setting, and who are interacting with other individuals within the congregate setting.
- (b) Rapid antigen tests should only be used for asymptomatic employees. Rapid antigen tests should not be used with symptomatic employees or employees who have had close contact with confirmed positive cases.
- (c) Employees who have previously been diagnosed with and recovered from COVID-19 infection may resume asymptomatic screening testing after 90 days from their COVID-19 infection (based on the date of their positive result).

#### 6.03 Testing Frequency

- Unvaccinated or partially vaccinated employees without symptoms must be tested for COVID-19. Testing will be conducted on the following schedule:
  - Employee works full time each week: Tests will be spaced out up to a maximum of 3 per week.
  - Employee works 1 shift per week: 1 test completed per shift.
  - Employee works 2 consecutive shifts weekly: Test twice, once per shift.
  - Employee works 3 consecutive shifts weekly: Test three times, once per shift.
- Any employees experiencing symptoms of COVID-19 must go to a Health PEI COVID-19 clinic for testing.

#### 6.04 Testing Procedure

- (a) Appropriate safety precautions, in accordance with the manufacturer's label, must be taken for all rapid antigen tests to ensure the safety of the employee being tested as well as the employee conducting or witnessing the specimen collection and performing the test. If a test is conducted through a self-testing method, the specimen collection must be overseen and witnessed by another person at the congregate setting in order to be compliant.

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- (b) See Appendix A: COVID-19 Rapid Antigen Test Procedure for specific instructions.
- (c) Employees must arrive fifteen (15) minutes ahead of their scheduled shift to complete the testing requirement and this will be on the employee's own time.

6.05 Positive Case Results

- (a) A presumptive positive rapid antigen result means that the employee may be infected with COVID-19. However, rapid antigen tests do occasionally produce false positive results, and the employee will need a regular laboratory PCR test to confirm their result.
- (b) If an employee receives a presumptive positive result after a self-test they must:
  - Inform the supervisor, or designate, at the congregate setting of the result and access a laboratory-based PCR test through a COVID-19.
  - Go home immediately and self-isolate until they receive their PCR test result.
  - They may safely return to the congregate setting once they receive a negative PCR test result.
  - If the confirmatory test is positive, the CPHO will follow up directly with the employee.
- (c) If there is a presumptive positive result at a congregate setting site, the Employer shall:
  - Ensure the employee is advised of their responsibility to access a laboratory-based PCR test through a Health PEI COVID-19 testing clinic as soon as possible.
  - Inform the employee that they must leave the site as soon as operationally feasible and determine when that must occur.
  - Call the Chief Public Health Office nurse on-call at 902-213-5824 during the hours of 0800hr-2100hr to report the presumptive positive case, by name and work location, and notify that the employee has been directed to take a PCR test. If the presumptive

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positive result is outside of the on-call hours, the call must be made at 0800hr the next morning.

- Follow up with the employee to confirm that that they have received a negative PCR test.
- If the confirmatory test is positive, the CPHO will follow up directly with the positive case.

## **7. Organizational Responsibilities**

- 7.01 The Employer is responsible for ensuring that fully vaccinated employees submit their immunization records to the Employer.
- 7.02 Where an employee is unwilling to submit their immunization record or is partially vaccinated or unvaccinated, they must ensure employees comply with the rapid antigen testing requirements.
- 7.03 In providing rapid antigen testing, the Employer is responsible for:
- Retaining existing public health measures such as symptom screening, masking and PPE, hand hygiene, physical distancing, and outbreak procedures. Rapid antigen testing does not replace these measures.
  - Ensuring safe and secure storage of testing supplies and records of testing.
  - Ensuring adequate inventory of testing supplies.
  - Cooperating with the Chief Public Health Office in the event of an exposure or outbreak investigation.
  - Having a systematic procedure in place to:
    - inform each tested employee of the result of their rapid antigen test; and
    - a process in place to follow when there is a presumptive positive rapid antigen test result, recommendation for and information about accessing confirmatory PCR testing and return to work requirements.
- 7.04 The Employer is responsible to maintain weekly records that can be made available to the CPHO on request, that includes the following variables:
- Congregate setting name, location, and contact information
  - Name of each employee who have provided proof of being fully vaccinated under Order.

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- Name of each employee who did not provide proof of being fully vaccinated.
- The results of the employee's rapid test required under the Order.
- The number of rapid tests that the public service provider has in its inventory.

7.05 Weekly records including the variables noted in 7.04 should be stored in digital format in a safe, secure location to maintain the confidentiality of personal information collected.

### Confidentiality

7.06 Immunization results and any test results or other health assessment information disclosed to the Employer shall be treated as strictly confidential, except where limited disclosure is necessary for related health and safety concerns (e.g. potential risks to self, others, the Employer) and if the matter proceeds to discipline or arbitration.

## **8. Policy Violations & Consequences**

8.01 In adherence of the CPHO Order and in keeping with the Employer's commitment to a safe and healthy work environment, any Employee who violates this Policy will be requested to meet with the Employer within 24 hours to address non-compliance. The Employee may be subject to disciplinary action, as appropriate, up to and including termination of their employment.

## **9. References**

Refer to: *CPHO Vaccination Information and Testing Policy Order for Front Line Public Service Providers.*

### **Appendices**

Appendix A – COVID-19 Rapid Antigen Test Procedure

## APPENDIX A: COVID-19 Rapid Antigen Test Procedure

### Performing your rapid antigen test for COVID-19 using Abbott PanBio

#### Your testing kit contains:



Nasal swab



Test tube with small amount of clear liquid



Test cartridge

#### You will need:

- A clean, level surface
- Paper towel
- Hand sanitizer
- A timer or clock

Scan this QR code for an instructional video



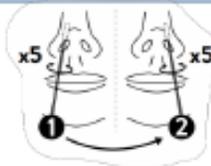
#### Before you start

- Sanitize your hands
- Lay paper towel on a clean, level surface

- Open the contents of your testing kit
- Remove the test cartridge from the wrapper
- Write your name with marker or pencil on the cartridge if testing more than one person

#### STEP 1

Insert the swab into your nostril, approximately 2cm. Rub and rotate the swab 5 times around and repeat for the other nostril (your eyes may water).



#### STEP 2

Gently tap the test tube to bring the fluid to the bottom. Remove blue cap. Immerse swab tip into liquid, swirling up and down for 10 seconds. Pinch tube around swab to squeeze out remaining liquid.



#### STEP 3

Find the break line on the swab handle and snap the swab here. Replace the blue cap, with the swab remaining inside of the tube.



#### STEP 4

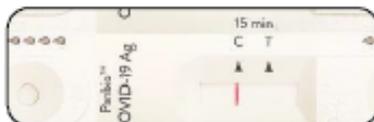
Twist off the white dropper cap from the bottom of the test tube. Gently squeeze 5 drops into the round well of the test cartridge.



**STEP 5:** Let the sample move across the white strip. After a total of 15 minutes, you can determine the result. When finished, put testing supplies in the garbage, sanitize your hands, and clean your testing space.

#### NEGATIVE Result

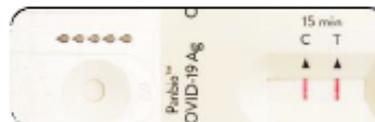
One line at the C mark, no line at the T mark.



A negative test still means you have to wear a mask. A negative test is only valid for the day. You could become positive after today. If you develop symptoms at any point, or have a known COVID contact, you must get a lab-based test.

#### POSITIVE Result (Virus detected)

Two lines: one at the C mark, one at the T mark.



You must immediately self isolate, ensure your employer is aware. A lab-based PCR test will need to be completed as soon as possible.

Your employer will contact the CPHO for follow up.

#### INVALID Result

If your test result does not match either the NEGATIVE or POSITIVE examples, the test may not have worked. In that case, please contact us for advice: [HomeTestKit@gov.pe.ca](mailto:HomeTestKit@gov.pe.ca)

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Scan this QR code  
to see an  
instructional video



**Keep testing kit out of reach  
of children and pets –  
do not drink test fluid**