

413 COVID-19 HARM REDUCTION

*This Administrative Procedure is in effect immediately. Staff will have until **November 24, 2021** to bring themselves into compliance.*

BACKGROUND

Canadian Rockies School Division (“the Division”) is committed to providing safe and healthy learning and working environments. The Division commits to protecting students and employees from injury, illness, and accidents as required by occupational health and safety legislation, the Education Act, and common law. Transmittable diseases, including COVID-19, are identifiable workplace hazards. Such hazards can have a detrimental effect on health and safety, Division operations, student learning, employee productivity, Division costs, and employee morale. The Division has legal obligations to take all reasonable steps to identify, eliminate, and control workplace hazards like COVID-19.

The purpose of this administrative procedure is to mitigate the risk of spread of COVID-19 infection in all Division facilities in order to protect staff, students, and their families from a highly contagious illness during the global pandemic.

COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-COV-2). Exposure to the virus typically occurs through: (1) inhalation of fine respiratory droplets and aerosol particles; (2) deposit of respiratory droplets and particles on exposed mucous membranes in the mouth, nose, or eye by a direct splash or spray; or (3) touching mucous membranes with hands that have been soiled by virus-containing respiratory fluids (or touching surfaces with the virus on them).

Typical symptoms of infection include fever, cough, shortness of breath, and several other symptoms. Asymptomatic infection is also possible. The risk of severe disease and death increases with age and is elevated in those with underlying medical conditions and those who are pregnant. Previous to the Delta Strain of COVID-19, younger persons have been less likely to develop serious illness or death. However, the emergence of variant strains have seen increasing hospitalization rates and death among younger age groups.

The 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 that a mandatory proof of vaccination or negative test policy be implemented by all School Divisions.

SCOPE

This Administrative Procedure applies to all employees and School Board Trustees of CRSD. It **also** applies to all persons carrying out duties, or activities on Division property and volunteers of the Division. Any new employees, contractors, guests and volunteers to the Division on or after November 24th, 2021 will require proof of full vaccination **or** proof of rapid testing for COVID-19 as a condition of employment or volunteering except as specifically exempted below.

TERMS

COVID-19: Refers to the virus designated “coronavirus 2 (SARS-COV-2)”.

Division: Means Canadian Rockies School Division.

Employee: Means any and every employee of the Division while such individual is performing services on behalf of the Division or on Division property.

School Board Trustee: An elected member of the Canadian Rockies School Division.

Fully Vaccinated: Refers to receiving the required number of doses of vaccine as per Health Canada guidelines. See “vaccine” for further information.

Human Resources: Refers to the Human Resources Department of the Division.

Rapid Test: Refers to any testing devices authorized by Health Canada and approved by the Division.

Vaccine: Refers to any vaccine approved by Health Canada for inoculation against COVID-19. Currently this includes: the Moderna COVID-19 vaccine (2 doses required); the Pfizer-BioNTech COVID-19 vaccine (2 doses required); AstraZeneca COVID-19 vaccine (2 doses required); and the Janssen (Johnson & Johnson) COVID-19 vaccine (1 dose required). A combination of vaccines as approved by Health Canada is also acceptable.

Practicum Students: means any individual who engages in Division related activities and who has direct contact with Division employees and/or students within the role of:

- a. any kind of educational placement or practicum provided through an agreement between the Division and a post secondary educational institution (e.g. student teachers, educational assistants, nurses, psychologists, behaviour therapists, speech language pathologists etc.); or
- b. any internship, co-op placement or apprenticeship program.

PROCEDURE

EMPLOYEE REQUIREMENTS

- 1.1. This Administrative Procedure is in addition to other employee requirements mandated by government authorities and by the Board with respect to COVID-19 (e.g., mask wearing requirements) and does not supersede or

replace any other measures, procedures or policies in place to address the hazard posed by COVID-19. The Administrative Procedure imposes two alternatives for compliance: vaccination against COVID-19 (Section 2) or semi-weekly rapid testing (Section 3).

- 1.2. **All employees and Trustees** shall complete the COVID-19 Vaccination Attestation form before **November 24th, 2021**, through the secure Employee Self Serve Portal Atrieve and declare one of the following:
 - I affirm that I am fully vaccinated against COVID-19.
 - I affirm that I have received my first dose and intend to receive my second dose as soon as possible.
 - I am not vaccinated against COVID-19 and will participate in Rapid Testing.
- 1.3. Employees who cannot comply with this Administrative Procedure have a duty to inform the Division.
- 1.4. Employees who are unable to show proof of immunization and be fully vaccinated by November 24, 2021 or are unwilling to routinely show proof of COVID-19 semi-weekly rapid testing, shall be considered non-compliant with this Administrative Procedure. Human Resources 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:
 - 1.4.1. Leave of absence without pay and benefits;
 - 1.4.2. Reassignment or modification of duties in very limited circumstances; and
 - 1.4.3. Conclusion of employment.

2. PROOF OF VACCINATION REQUIREMENT FOR CRSD EMPLOYEES

All employees, including Trustees who are not yet fully immunized against COVID-19 are required to meet the following obligations:

- 2.1 Employees who choose the vaccination option shall adhere to the following procedure:
 - 2.1.1 The employee must be fully vaccinated with a vaccine recommended by Health Canada or Alberta Health Services, no later than **November 24, 2021**.
 - 2.1.2 When completing the Vaccination Attestation in Atrieve, the employee shall upload proof of vaccination from Alberta Health Services on the secure employee portal Atrieve, prior to **November 24th, 2021**. Proof of vaccination includes:

- 2.1.2.1 the employee's vaccination record received post-vaccination;
or
 - 2.1.2.2 the record of vaccinations/immunizations/QR Code from Alberta Health Services; or
 - 2.1.2.3 where applicable, equivalent proof of vaccination from another Canadian Province or Territory or the Canadian Armed Forces will be accepted.
- 2.2 Uploaded vaccination documents shall be temporarily stored in Atrieve, but deleted when this Administrative Procedure is repealed. These documents shall not be part of the employee's personnel file.
 - 2.3 All full-time or part-time employees are entitled to three hours of paid leave to obtain a COVID-19 vaccination to the extent provided under s. 53.982 of the *Employment Standards Code* (Alberta).
 - 2.4 Employees must update their COVID-19 Immunization status with the Division if changes occur.
 - 2.5 As of November 24, 2021, all employees who have attested to receiving one vaccination (section 1.2), must follow the procedures for rapid testing as outlined in Section 3 until such time as they are considered fully vaccinated (two weeks after the date of their second vaccination).
 - 2.6 As of November 24, 2021, all employees who have attested to not being vaccinated and selecting rapid testing as a means to comply with Administrative Procedure 413, will commence with the Semi-Weekly Rapid Testing requirements outlined in Section 3.

3. SEMI-WEEKLY RAPID TESTING REQUIREMENT FOR CRSD EMPLOYEES

Employees who do not provide proof of vaccination shall comply with this Administrative Procedure by providing the results of rapid testing on a semi-weekly basis and wearing a mask at all times (unless eating or drinking) when inside CRSD facilities. Although the cost of testing is normally paid by the employee, in order to temporarily limit the burden of such costs, and out of care and concern for all employees, CRSD will provide rapid test kits at no charge for employees who select this option. This measure will be reviewed monthly to determine if Division supply of rapid test kits continues to be a feasible and appropriate approach. At such time that the Division no longer provides free rapid test kits, employees will have to obtain their own rapid test on their own time and at their own expense. The Division is not legally obligated to provide rapid test kits.

To comply with this option, employees shall:

- 3.1 Complete training on rapid testing procedure, provided by the district, by **November 24, 2021**.

- 3.2 While the division is providing rapid test kits, obtain rapid test kits from the principal / designated supervisor at each work site. Rapid test kits will be distributed confidentially, on a weekly basis.
- 3.3 Beginning the week of **November 24th, 2021**, perform a rapid test at home on Sunday evening and Wednesday evening (for full time employees) of each work week. Part time employees will select testing days (the evening prior) that adhere to the 72 hour testing requirement and appropriate to their work schedule.
- 3.4 Upon completion of each rapid test:
 - 3.4.1 Complete a COVID-19 Rapid Test Attestation form in Atrieve before 7:00 p.m. on Sunday and Wednesday evening for full time employees. Part time employees will select testing days/times that are appropriate to their work schedule. The Attestation must be uploaded by 7:00 PM the evening before your day of work. Proof of rapid testing remains valid for 72 hours from the time and date of the test.
 - 3.4.2 Rapid testing documents for employees will be temporarily stored in Atrieve, but deleted when this Administrative Procedure is repealed. These documents will not be part of the employee's personnel file.
 - 3.4.3 Follow [Alberta Health Services COVID-10 Rapid Test Guidelines](#)
 - 3.4.4 In the event of testing positive for COVID-19, following your isolation period, please contact your school administrator or supervisor for how to proceed regarding rapid testing in accordance with current AHS Guidelines.

4. HUMAN RESOURCES DUTIES

The Human Resources Department is responsible for:

- 4.1 Ensuring 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").
- 4.2 Ensuring the information regarding any individual's vaccination status or test results, including but not limited to any individual's Alberta Health COVID-19 Immunization Record, has been collected pursuant to Section 33(c) of FOIP and will be kept confidential, stored in a secure location, and access and disclosure limited to that permissible by FOIP.

- 4.3 Destroying any notation or record in their possession gathered from the proof of vaccination or rapid testing results when this Administrative Procedure is repealed.
- 4.4 Answering questions from employees with respect to the use, collection, and storage of information gathered under this administrative procedure.

5. EXEMPTIONS

- 5.1. The Division recognizes its responsibilities and duties pursuant to the Alberta Human Rights Act. As a result, those employees who are not fully vaccinated will be reasonably accommodated, and required to participate in the regular COVID-19 testing procedures outlined above in this Administrative Procedure.

6. NON-EMPLOYEE REQUIREMENTS

- 6.1. Contractors must ensure that their workers who carry out duties or activities on Division property comply with this Administrative Procedure (i.e. by either demonstrating proof of vaccination or proof of negative rapid test result taken within 72 hours of the contractor's attendance at Division property), at the expense of the contractor or their employee.
- 6.2. Practicum students must comply with this Administrative Procedure by either demonstrating proof of vaccination or proof of a negative rapid test within 72 hours of their attendance on Division property to their educational institution, who in turn shall provide a declaration of compliance to the Division at the expense of either the practicum student or educational institution.
- 6.3. Volunteers and guests of the Division are required to demonstrate proof of vaccination or proof of a negative rapid test result taken within 72 hours of attendance at Division property, at the expense of the volunteer or guest. The attestation form (Appendix A or B) shall be sent in advance to the school administrator.
- 6.4. If the Division re-entry plan permits, spectators who attend extra-curricular and sporting events held after regular school hours will not be governed by this Administrative Procedure. Such gatherings must adhere to the AHS capacity, masking and social distancing guidelines in effect at the time of the event.

7. CONSEQUENCES FOR BREACH

- 7.1 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 on vaccination status or test results,

will result in administrative or disciplinary action up to and including termination of employment, for just cause.

- 7.2 Any volunteers, independently contracted service providers or practicum students to which this Administrative Procedure is applicable, 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 and cease performance of all duties as a volunteer, independently contracted service provider or practicum student interacting with the Division's staff or students. With respect to any practicum students, any event of non-compliance may result in reporting the event of non-compliance to the appropriate post-secondary institution.

8. ADMINISTRATIVE PROCEDURE REVIEW

- 8.1. 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 reviewed (bi-monthly) and updated/amended as deemed necessary.

References

ALBERTA HUMAN RIGHTS ACT, RSA 2000, c. A-25.5
Freedom of Information and Protection of Privacy Act
Medicine Hat Public School Division
Christ the Redeemer Catholic School Division

History

Developed: November 2021
Amended: January 2022

Appendix A

COVID-19 Vaccination Attestation form

I, _____, a volunteer/contractor of Canadian Rockies School Division through submission of this form (employees will complete this attestation via Atrieve).

- Affirm that I am fully vaccinated against COVID-19.
- Affirm that I have received my first dose and intend to receive my second dose as soon as possible.
- Affirm that I am not vaccinated against COVID-19, and will participate in rapid testing semi-weekly (OR as required).

Volunteer Signature

Date

Administrative Procedure 413 states:

7. CONSEQUENCES FOR BREACH

- 7.1 Any volunteers, independently contracted service providers or practicum students to which this Administrative Procedure is applicable, 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 and cease performance of all duties as a volunteer, independently contracted service provider or practicum student interacting with the Division's staff or students. With respect to any Practicum Students, any event of non-compliance may result in reporting the event of non-compliance to the appropriate post-secondary institution.

Appendix B

COVID-19 Rapid Test Results Attestation

I, _____, a volunteer/contractor of Canadian Rockies School Division, confirm through submission of this form that on _____, 20__ at _____ a.m./p.m. I performed a Health Canada approved COVID-19 Rapid Test pursuant to Administrative Procedure 413 on which I have been trained and confirm that the result of this test was:

Negative

Positive

I understand that knowingly submitting a false result of the test or tampering with the test to create a false result is an extremely serious breach of the terms and conditions of my employment. I understand that such conduct would result in severe disciplinary action up to and including consideration of immediate dismissal for just cause (employees will complete this attestation via Atrieve).

Volunteer Signature

Date

Administrative Procedure 413 states:

7. CONSEQUENCES FOR BREACH

- 7.1 Any volunteers, independently contracted service providers or practicum students to which this Administrative Procedure is applicable, 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 and cease performance of all duties as a volunteer, independently contracted service provider or practicum student interacting with the Division's staff or students. With respect to any Practicum Students, any event of non-compliance may result in reporting the event of non-compliance to the appropriate post-secondary institution.

Appendix C

Canadian Rockies School Division / CRSD Employees: Procedures for using COVID-19 Rapid Test Kits

1. Remove yellow cap from reagent tube and carefully place tube back in tube container (tray). ***Reagents contain sodium azide, which is harmful if inhaled, swallowed or exposed to skin. If there is contact with skin, wash immediately with plenty of water. Contact with acids produces very toxic gas.**
2. Remove nasal swab by peeling back the package end opposite the swab. Look for “Peel here”
3. Insert swab up to 1 inch into the nostril and roll 5 times (approximately 5 seconds), then do the same on the other nostril.
4. Place swab into reagent tube – being careful not to splash contents out of tube. Gently plunge up and down for a minimum of 15 seconds.
5. Remove the swab while squeezing the tube to extract liquid from the swab.
6. Flip the attached dispensing tip onto the reagent tube and press down firmly ensuring you hear a click. Mix thoroughly by swirling or flicking the bottom of the tube.
7. Dispose of swab in the garbage can.
8. Once processed (nasal swab into reagent), you have 30 minutes to add reagent to the test device.
9. Get the testing device and with the reagent tube inverted squeeze 3 drops into the bottom window (sample well – with a pic of drops and the number 3) of the testing device.
10. Wait for the liquid (lite red in colour) to fill the other screen on the testing device and show either 1 or 2 lines. (Note: all tests must sit for 15 minutes)
11. Dispose of any garbage appropriately.
12. Sanitize hands.
13. **If one line appears - your test result is negative (skip to Step # 15)**
14. **If 2 lines appear (indicating positive) complete the following steps:**
 - a. Isolate immediately.
 - b. 24 hours after the initial positive result, take a second rapid test.
 - c. If the second test is positive, you must stay isolated for a full 10 days from the first positive test, notify your administrator/supervisor and book for testing with AHS for a regular PCR test and follow all instructions from Alberta Health Services.
 - c. If the 2nd test is negative and you are still asymptomatic, you can cautiously resume regular activities while continuing to follow all public health guidelines.
15. Dispose of any garbage appropriately.
16. Record results.
17. **Upload / complete COVID-19 Rapid Test Results attestation form in Atrieve. If you have any questions, please see your administrator/supervisor.**