

October 1, 2021

MEMO TO: Long-Term Care Home Licensees

FROM: Erin Hannah
Associate Deputy Minister

SUBJECT: Immunization Policy Update

Thank you for your continued efforts to promote and encourage vaccination for all staff, student placements and volunteers in your organizations. We are pleased to report that as of August 31, 2021, based on the data reported by all 626 homes, 90% of all staff, student placements and volunteers have at least one dose of vaccine and 86% are fully vaccinated. This milestone could not have been accomplished without the dedication and commitment of you and your teams, family and resident councils, and our health partners, and we look forward to receiving your immunization policy reports for the September reporting period by October 7, 2021.

While there has been steady progress to get as many staff vaccinated as possible, we continue to see variability at the home level. We all know we are now in a fourth wave of the COVID-19 pandemic, a wave driven by the Delta variant, the predominant strain circulating in Ontario that is more transmissible and may cause more severe disease than the previous strains.

To provide the greatest protection possible to long-term care residents, we are taking the next progressive step in our COVID-19 vaccination policy and related actions.

Mandatory vaccination in all long-term care homes

Effective today (October 1), the Minister of Long-Term Care has issued a revised *Minister's Directive: Long-Term Care Home COVID-19 Immunization Policy*. Per the revised Directive, every licensee must ensure that all staff, support workers, students, and volunteers provide proof of vaccination against COVID-19 or a valid medical exemption. Existing staff, students and volunteers, as well as support workers who currently attend the home, must provide this proof by November 15, 2021. Effective immediately, any new staff, support workers, students or volunteers must provide it before they begin working, undertaking their placement or volunteering in the home.

Moving to a province-wide mandatory vaccination policy is a progressive step that many in the sector have called for, and we know you are well-poised to communicate this rapidly to your teams, residents and families, and ensure that staff are supported to get their first dose as soon as possible in order to meet the November 15th deadline for two doses. Staff, support workers, students or volunteers who choose not to provide proof of vaccination, or proof of a valid medical exemption, by the required date will not be able to attend a long-term care home to work, undertake a student placement or volunteer.

This directive has also been updated to support public posting of home level data. Following on the advance notice provided via LTCHomes.net in September, we will start to post this data today in combination with the updated immunization policy. Our goal is to support transparency and build confidence that collectively, long-term care sector partners have made significant progress in promoting the benefits of vaccination.

In addition, to aid in the early detection of possible breakthrough cases, effective October 15, 2021, the Minister's Directive: Long-Term Care Home Surveillance Testing and Access to Homes will require licensees to ensure homes conduct randomized testing of fully immunized individuals, at an interval to be determined by the licensee. The MLTC Guidance Document provides additional information on operationalizing this requirement.

Implementation Information

Staff, support workers, students and volunteers who do not have a valid medical exemption must have received all required doses of vaccine by November 15, 2021, or in the case of new staff, support workers, students and volunteers, before they begin working, undertaking their placement or volunteering in the home. If a support worker is attending the home for emergency or palliative situations, to provide timely medical care, or for the purposes of making a delivery, they are not required to provide proof of being fully vaccinated in order to enter the home.

For most people, receiving “all required doses of vaccine” means two doses of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines. In addition, the Directive does provide for people who may have received some or all of their vaccine doses outside of Canada, including of vaccines that are not authorized by Health Canada. Specifically, the Directive requires proof that the person has received:

- the full series of a COVID-19 vaccine authorized by Health Canada, or any combination of such vaccines, or
- one or two doses of a COVID-19 vaccine not authorized by Health Canada, followed by one dose of a COVID-19 mRNA vaccine authorized by Health Canada, or
- three doses of a COVID-19 vaccine not authorized by Health Canada.

To support homes in implementing this new requirement, we have updated the Resource Guide with new sample messages, as well as a checklist for introducing a mandatory vaccination policy based on learnings shared with us from homes that have already introduced this policy. Homes that have introduced their own mandatory vaccination policies can maintain the earlier deadlines by which staff must receive all required doses or provide proof of a medical exemption.

While we are hopeful that most staff will choose to be vaccinated and continue to work in your homes, we recognize that some staff may refuse and will no longer be able to do so. As a reminder, homes have access to Prevention and Containment funding to cover COVID-19-related staffing costs. Homes also have staffing and operational flexibility provided through O. Reg. 95/20: Streamlining Requirements for Long-Term Care Homes, under the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*. For example:

- Licensees may fill any staff position with the person who, in their reasonable opinion, has the adequate skills, training and knowledge to perform the duties required of that position.
- Licensees are not required to ensure the minimum number of staffing hours required under the *Long-Term Care Homes Act, 2007* or O. Reg. 79/10 for a position are met, provided all care requirements are met.

In addition, O. Reg. 79/10: General, under the *Long-Term Care Homes Act, 2007*, provides homes with operational flexibility during a pandemic. For example, where homes are not able to meet the requirement under the Act for a registered nurse who is member of the regular nursing staff to be present in the home at all times, other people may fill this role, such as a registered practical nurse provided the Director of Nursing and Personal Care or a registered nurse is available for consultation.

The above supports, along with a home level risk assessment and proactive staffing contingency plan are important to successfully support the progressive shift to a mandatory vaccination policy. Should you see signs of an imminent and significant staffing shortage leading up to November 15th, please contact the pandemic response team at the email below.

As always, we are available to support homes directly should they have any questions related to the pandemic, including regarding vaccination in long-term care homes. The team can be reached by emailing MLTCPandemicResponse@ontario.ca.

Sincerely,

original signed by

Erin Hannah

Attachments (5):

- Minister's Directive – Long-Term Care Home COVID-19 Immunization Policy
- Immunization Policy Resource Guide
- Minister's Directive – Long-Term Care Home Surveillance Testing and Access to Homes
- MLTC COVID-19 Guidance Document
- Pandemic Response FAQs

c: Nancy Matthews, Deputy Minister, Ministry of Long-Term Care (MLTC)
Dr. Catherine Zahn, Deputy Minister, Ministry of Health (MOH)
Dr. Kieran Moore, Chief Medical Officer of Health
Dr. Barbara Yaffe, Associate Chief Medical Officer of Health

Alison Blair, Associate Deputy Minister, Pandemic Response and Recovery
Division, MOH
Michael Hillmer, Assistant Deputy Minister, Capacity Planning and Analytics
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Lisa Levin, Chief Executive Officer, AdvantAge Ontario
Donna Duncan, Chief Executive Officer, Ontario Long Term Care Association
Monika Turner, Association of Municipalities of Ontario
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Colleen Geiger, President and CEO (Acting), Public Health Ontario
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