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## COVID-19 Rapid Antigen Testing Policy

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*Approved September 10, 2021*

### **PURPOSE:**

The purpose of this Policy is to detect and respond to COVID-19, a highly infectious and deadly communicable disease, in the workplace through the use of rapid antigen testing of Woodview Mental Health and Autism Services (“**Woodview**”) employees, volunteers, students, contractors (referred to together as “**Staff**”). This permits protective measures to be taken as early as possible to ensure the health and safety of both Staff and the people we support.

This Policy has been developed by Woodview in compliance with Provincial Guidance regarding rapid antigen testing as a reasonable and necessary measure to prevent, respond to, and alleviate the outbreak of COVID-19 and the associated risk to our Staff and to the vulnerable people that we support, many of whom are medically fragile and/or cannot comply with social distancing and infectious disease transmission prevention protocols.

This Policy is also adopted to comply with our obligations under the *Occupational Health and Safety Act* (OHSA) to take every reasonable precaution in the circumstances to protect a worker and to comply with our obligation under applicable emergency orders, as well as government mandated rapid antigen testing for unvaccinated and partially vaccinated Staff and the recommendations and directions of our local Public Health Unit.

### **INFORMATION ABOUT RAPID ANTIGEN POCT**

A number of rapid antigen COVID-19 tests have been approved by Health Canada. The Province of Ontario has provided a number of guidance documents on their appropriate use.

Rapid antigen COVID-19 tests provide quick detection of COVID-19 (sometimes in as little as 15 minutes) with less sensitivity than regular molecular laboratory-based COVID-19 tests. That means that there is a higher rate of false negatives and false positives. A false negative is a result that incorrectly shows that a person does not have COVID-19, while a false positive is a result that inaccurately shows that a person does have COVID-19. Despite this, these tests are accurate enough that they can catch many asymptomatic cases of COVID-19 early.

For that reason, the Province is recommending these rapid tests for screening use but not for diagnosis of COVID-19 and has mandated their use for unvaccinated and partially vaccinated Staff in certain high risk settings. That means that the tests can be used to identify people who may have COVID-19 and who must undergo more accurate testing to confirm that they do or do not have it. That means that if someone has a positive result using a rapid antigen test, the Province requires that they undergo a confirmatory laboratory test within 24 hours. It also means that a negative result does not mean that a person does not have COVID-19, and that the person being tested should continue to take all precautions.

Note, fully vaccinated staff who have previously had a confirmed case of COVID-19 are not eligible for voluntary rapid antigen testing. Unvaccinated and partially vaccinated employees who have previously tested positive must nonetheless comply with rapid antigen testing requirements unless otherwise directed by the government of Ontario.

Woodview will provide each unvaccinated and partially vaccinated staff with a Panbio™ COVID-19 Ag Rapid Test Kit, with tests to be self-administered on a twice weekly basis. The Panbio™ COVID-19 Ag Rapid Test is an antigen test used for point-of-care testing (POCT) that detects COVID-19 in 15 to 20 minutes. The Panbio™ COVID-19 Ag Rapid test should only be used on asymptomatic individuals for screening purposes only.

#### **EFFECTIVE DATE:**

This Policy will take effect on September 24, 2021.

#### **SCOPE:**

Woodview's **COVID-19 Rapid Antigen Testing Policy** applies to all Woodview employees, contractors who regularly enter Woodview worksites or premises (including third-party staffing agencies), volunteers, students and any person who performs work for Woodview (all collectively referred to herein as "**Staff**").

However, it will not apply to contractors who do not regularly enter Woodview worksites or premises. This includes instances where Woodview hires a contractor to perform a single job (such as a plumber hired to repair a leaking pipe) or where Woodview retains a service provider to provide remote services (such as remote information technology services).

#### **DEFINITIONS:**

"**Full vaccination**" or "**fully vaccinated**" is defined as meaning that a Staff has met both of the following criteria:

- a) They have received all required doses of a full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization ("WHO") (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and
- b) At least 14 days have passed since they received their final dose of the COVID-19 vaccine.

Being "**unvaccinated**" or "**not vaccinated**" is defined as not meeting the above criteria. For clarity, a staff who is partially but not fully vaccinated is considered to be unvaccinated or not vaccinated under this policy.

#### **POLICY:**

1. **Mandatory Rapid Antigen Screening:** Staff will be required to participate in Rapid Antigen Testing as follows:
  - a. **Outbreak:** In accordance with directives from Public Health, all Staff regardless of vaccination status, in the event of an outbreak in the Staff's program location.
  - b. **Unvaccinated or Partially Vaccinated Staff:** Twice weekly on Mondays and Thursdays, within 12 hours of the start of their work day. Staff are to ensure they have sufficient time to complete, obtain and report the results prior to the start of their work day.

2. **Respect for Human Rights:** Woodview will provide accommodation up to the point of undue hardship to any Staff who is unable to undergo rapid antigen screening for bona fide medical reasons (or other grounds protected under the Ontario Human Rights Code).

## **PROCEDURE:**

1. **Eligibility and Timing.**

- a. **Unvaccinated or Partially Vaccinated Staff:**

- i. Starting on September 24, 2021 unvaccinated or partially vaccinated staff must provide proof to their manager and [covid@woodview.ca](mailto:covid@woodview.ca) of a negative result from a Health Canada approved rapid antigen testing kit twice weekly on Mondays and Thursdays within 12 hours of the start of their work day. Unvaccinated and partially vaccinated staff members who do not provide proof of a negative test before the start of their work day shall not be permitted to work and will not be paid until they provide proof of a negative test.

- b. **All Staff:**

- i. All staff will comply with surveillance testing requirements as directed or recommended from time to time by local public health authorities during outbreaks or at any other time, and such testing requirements shall be a condition in order to qualify for active duty.

2. **Training.** Where Woodview provides rapid antigen test kits to Staff, all individuals self-administering a rapid antigen testing or administering a Rapid Antigen Test to another person must have received authorized direction / training on proper test administration protocol.

3. **Consent.** Rapid antigen testing for Staff requires one-time prior written consent of the individual being tested in the form attached at Schedule "C".

4. **Medical Exemptions from Testing.** Individuals for whom Rapid Antigen is not recommended, based on test kit manufacturers' guidance and/or recommendations from health and government authorities, are excluded from the scope of this policy provided that documentary evidence is provided to Woodview to support a medical exemption from testing. This does not exempt unvaccinated and partially vaccinated Staff from undergoing rapid antigen testing merely because they've previously tested positive for COVID-19. For Staff exempt from rapid antigen testing due to bona fide medical reasons, Woodview will consider whether accommodation is possible without undue hardship. If it is not possible, then the Staff will be placed on non-disciplinary unpaid leave of absence.

5. **Test Administration.** Unvaccinated and partially vaccinated staff will be provided with a Panbio™ COVID-19 Rapid Test kit containing 25 rapid tests as well as instructions on use of the test kit. The self-collection of specimens, proper handling of specimens, documentation and reporting of results, required actions depending upon results, and appropriate disposal of specimens, kits and other contaminated materials must follow the authorized protocols per the Rapid Antigen Test manufacturer's instructions, and directives per Ontario Health and Ontario Public

Health.

Prior to self-administering a Panbio™ rapid test, staff are to complete the following training modules:

*Take-home testing for the Panbio™ COVID-19 antigen rapid test:*

<https://www.youtube.com/watch?v=XP3aqwO5rJo>

*Self-Collection for COVID-19 Antigen Rapid Testing:*

<https://www.youtube.com/watch?v=RXIEz1YZFDQ>

*How to Swab Your Nose:*

<https://www.youtube.com/watch?v=RXIEz1YZFDQ&t=3s>

Staff will self-administer the rapid tests outside of the workplace and prior to attending their regular work location, on a twice weekly basis on Mondays and Thursdays, within 12 hours of the start of their work day, and provide photo evidence of the negative test result to their manager and [covid@woodview.ca](mailto:covid@woodview.ca) upon completion of each test.

Rapid testing kits provided to unvaccinated and partially vaccinated Staff are to be kept secure and stored, following the manufacturer's instructions, at room temperature (15°C to 30°C). Rapid testing kits are not to be shared or distributed and are not for personal use. Unused portions of rapid testing kits are to be returned to Woodview by the Staff.

6. **Proof For Testing Administered Elsewhere:** Staff are permitted to obtain rapid antigen testing administered by organizations and persons other than Woodview for the purpose of this policy. However, proof of test results satisfactory to Woodview must be provided in order for such results to be considered under this policy. Adequate proof may include a dated photograph of the test result.
7. **Positive Test Results:** Where a Staff receives a positive rapid antigen test result, the Staff must immediately notify their manager and Irene Richmond, and self-isolate. The Staff must undergo confirmatory laboratory-based PCR testing as soon as possible and in any event within the next 24 hours. If a Staff's confirmatory test is positive, they will need to continue self-isolating, and their local public health unit will be in contact with them. Staff with a confirmed result must immediately advise their manager and Irene Richmond.
8. **Testing on Staff's Own Time:** All rapid antigen testing of Staff must be conducted on the Staff's own time, twice weekly on Mondays and Thursdays, within 12 hours of the start of their work day. While Woodview will help to facilitate this process by offering rapid testing kits that can be used or administered prior to each Staff's work day, Staff remain free to obtain such testing in the community and any time taken in order to administer such testing is not work and shall be unpaid.

9. **COVID-19 Screening Still Applies:** All staff must continue to undergo initial standard screening conducted within the workplace in order to be permitted into the workplace. This applies regardless of the results of a rapid antigen test, and for fully vaccinated staff.

Staff who are symptomatic or otherwise fail initial standard screening, will be prohibited from entering the workplace as part of the initial standard screening process.

## **ACCOMMODATION**

1. Staff who decline to undergo rapid antigen testing for bona fide and substantiated protected reasons under the Ontario Human Rights Code, must submit a request for accommodation by September 24, 2021.
2. Woodview will assess based on the information provided whether accommodation is required and/or possible without undue hardship. Where required by law, Woodview will provide accommodation to the point of undue hardship.
3. Due to the serious health and safety issues at play, accommodation short of undue hardship may not be possible in all circumstances. Accommodations short of undue hardship may include other forms of testing.

## **CONFIDENTIALITY, REPORTING, AND RECORD KEEPING**

All personal health information shall not be collected, used, or disclosed except as permitted by this Policy or required by law.

Woodview may collect, use, or disclose information for the following purposes:

- In order to take reasonable steps to protect the health and safety of Staff and people supported by Woodview;
- In order to fulfill legitimate operational purposes; and
- In order to meet its legal reporting requirements under the *Occupational Health and Safety Act*, the *Health Protection and Promotion Act*, the *Workplace Safety & Insurance Act*, and any other applicable legislation and government directives.

Information about rapid antigen testing results will be stored in a secure manner and retained for only so long as required by law and/or for legitimate operational purposes, after which the records will be securely destroyed.

## **CONSEQUENCES OF BREACH OF POLICY.**

Consent and cooperation with testing as prescribed by this policy and/or mandated by the government is a condition of continuing active employment. Refusal to comply with this policy will result in Staff being placed on an unpaid leave of absence pending cooperation with the policy. Breach of the Covid-19 Rapid Antigen Testing Policy may result in progressive or immediate discipline up to and including termination for just cause.

## **REVIEW**

This policy will be reviewed on a regular basis and/or more frequently upon receipt of new and relevant information (including updated government and public health guidance).