

HCAP Mandatory Vaccination Direction

Version date: October 22, 2021

Background:

The Provincial Health Officer (PHO) has issued Orders outlining COVID-19 vaccination requirements for health care workers. These orders require vaccination for all staff in:

- Long-term care and senior's assisted living settings by October 12, 2021 (*Residential Care Covid-19 Preventive Measures Order; September 12, 2021*)
 - This Order was amended October 4, 2021 to permit partially vaccinated staff to work in some circumstances pending their full vaccination.
- Hospitals and other care locations where health care or services are provided, including community settings, with a first dose required by October 26, 2021 (*Hospital and Community (Health Care and Other Services) COVID-19 Vaccination Status Information and Preventive Measures Order; October 14, 2021*)

This document provides guidance and additional information regarding the vaccination requirements laid out in these Orders (for the purposes of this document, "vaccination orders") and the Health Career Access Program.

Mandatory vaccination requirements and HCAP

- The PHO vaccination orders apply to Health Care Support Workers (HCSWs) hired through the Health Career Access Program (HCAP) working or completing practicums in settings under the order. Employers should apply the same processes to these HCSWs as they are taking with other staff that fall under the Order.
- HEABC employers should follow the guidance issued by HEABC regarding implementing the mandatory vaccination requirements (see especially GIU 318, 319, and 321). If HEABC members have questions about how GIUs relate to HCAP staff, they should contact their HEABC representative. Non-HEABC employers may also wish to refer to the GIUs for guidance.

Ministry of Health Direction regarding HCSWs:

- The Ministry of Health is directing that, in addition to the requirements under the vaccination orders, as an HCAP program requirement:
 - **all** HCSWs working in long term care or assisted living must have received their first dose of a vaccine no later than Oct 12 and have received their second dose 28-35 days after dose 1. This includes HCSWs who are completing online education components.
 - **all** HCSWs working in home health and other community care locations, as defined in the October 14 PHO order, must have received their first dose of a vaccine no later than Oct 26 and have received their second dose 28-35 days after dose 1. This includes HCSWs who are completing online education components.
- An unvaccinated HCSW will not be able to complete practicums or work in the health sector. In most cases, this means Employers will take steps to terminate unvaccinated HCSWs. For HEABC members, this means following the advice in the GIUs noted above and applying it to the unique situation of each HCAP participant.

- This direction does not override any requirements for vaccination under the respective PHO vaccination orders or future orders, which may require the HCSW to be vaccinated earlier than this date.
- Employers should notify HCSWs of this requirement as soon as possible, and verify immunization status of these staff if they have not already done so. Employers should follow the same general steps as other staff and contact HCSWs not yet vaccinated to inquire as to why they are not vaccinated, and ask if they intend to seek vaccination, and refer to educational resources if these may help address concerns.

Q&As:

Why is the Ministry requiring HCSWs who are completing their online education components and/or employed in home health to also be vaccinated?

- Given the PHO vaccination orders, vaccination against Covid-19 is now a requirement to complete HCAP successfully. Regardless of current HCAP work setting or education status, HCSWs must meet COVID-19 vaccination requirements to complete HCAP practicum requirements and to be employed in the health sector to complete their return of service obligations upon graduation.

How do the vaccination orders apply to HCAP practicum students?

- Both vaccination orders include HCAP practicum students in their scope. The Hospital and Community Order (October 14) includes students in the definition of “staff member”. The Residential Care Order defines a staff member as “a person employed by the operator of a facility to work in a facility.” As HCAP practicum students are facility employees on educational leave, they are included in the scope of the Order’s staff member definition.

What is the effect of mandatory vaccinations on the HCAP Return of Service?

- HCSWs who have not yet graduated from the program may leave the program for any reason without incurring any obligations to repay under the terms of the HCAP return of service agreement.
- HCAP participants who have graduated and are working as an HCA in their 12-month return of service period should be treated in the same way as any other staff under the PHO orders. If an employee is terminated because they refuse to get vaccinated, it is unlikely that an employer would be successful enforcing the return of service agreement.

How do the vaccination requirements affect the recruitment processes for HCAP?

- Employers should begin immediately screening for COVID-19 vaccination status as part of recruitment into the program for all HCSWs (including home health positions).
- Employers may use the following wording in job descriptions to communicate vaccination status as an occupational requirement:
 - *Must be fully vaccinated against COVID-19 by date of hire to be considered. An individual is considered fully vaccinated when they are at least seven (7) days post-receipt of the second dose of an approved COVID-19 vaccine. Proof of vaccination required.*

Should internal HCAP hires who are refusing vaccination be returned to their base positions?

- As the vaccination orders include most health care workers and care settings across the province, internally-hired HCSW base positions are likely impacted. HEABC employers should

contact HEABC for advice on specific employee situations should they refuse to be vaccinated. Non-HEABC employers should contact Ministry staff directly for guidance on specific situations: HCAPInfoQuery@gov.bc.ca .