



Mandatory COVID-19 Testing of Staff and Visitors

Park West School Division herein after referred to as “Division” is committed to upholding its statutory obligations to provide a safe environment to all pupils who attend our schools, all employees who work in our facilities, and all members of our community who volunteer or visit our schools (Public Schools Act 41(1); Workplace Safety and Health Act 4(1) & 4(2)).

On August 24, 2021, Manitoba Public Health announced its intention to introduce new Public Health Orders that would compel all employers providing services to vulnerable populations (including children) to observe the implementation of mandatory collection of proof of full vaccination or mandatory testing of all employees and school site visitors having direct contact with children. The Division is also asking that those employees who work in the division office and bus garage to provide evidence of vaccination. These Orders are expected to be published in fall, 2021.

On September 2, 2021, Manitoba Education published additional directives pertaining to “immunization and testing requirements” that serve to operationalize the mandatory collection of proof of full vaccination or mandatory testing of all employees and school site visitors having direct contact with children.

This policy is one component of a comprehensive divisional pandemic response plan that aims to:

- Ensure a successful return to in-school learning, uninterrupted by COVID-19 outbreaks;
- Reduce transmission of COVID-19 in the Division’s schools and facilities; and
- Mitigate the risk of severe COVID-19 outcomes among individuals in our schools, particularly those individuals who are unable to be vaccinated due to legitimate medical, personal or religious reasons or for whom vaccines are not currently approved, notably children born after December 2009.

In accordance with the September 2, 2021, directives published by Manitoba Education on “immunization and testing requirements” educational workers including teachers, educational support staff, school administration staff, custodial staff, bus drivers, child care staff working in school-based early learning and child care facilities, clinical and health care related occupations in schools; volunteers; and post-secondary practicum students, are required to provide proof of full vaccination or submit to testing “up to three times per week.”

The provincial immunization and testing requirements may be found at:

https://manitoba.ca/asset_library/en/proactive/20212022/orders-soe-08272021.pdf

To comply with these requirements the Division has developed these policies, subject to the **GUIDELINES** and **PROCEDURES** that follow, providing that all of its employees and/or volunteers who have direct contact with pupils in the Division must undergo testing up to three times per week or provide proof of full vaccination. Additionally, the Division mandate that all school trustees/board members and visitors who have direct contact with vulnerable populations (including children) are, at the discretion of the Division, required to submit proof of full vaccination prior to entry to school properties where children may be present and/or, at the discretion of the Division, to undergo testing up to three times per week, in order to enter a Division facility. For clarity, the Division may, at its discretion, require those school trustees/board members and visitors who attend a divisional facility on an irregular basis, to have conducted and received a negative test within 48 hours prior to their attendance at such a facility.

For the purposes of this policy, “fully vaccinated” shall mean individuals who have received both doses (any combination) of an approved two dose COVID-19 vaccine (AstraZeneca, Pfizer, Moderna), or a single dose of an approved single dose COVID-19 vaccine (Janssen/Johnson & Johnson) with more than 14 days having passed since the final vaccination was received, which definition shall be subject to ongoing amendment and compliance with the Manitoba Public Health definition of “full vaccination” which may exceed the current dosage definition.

Guidelines

Staff/Volunteers

All persons employed or engaged by the Division as of September 2, 2021, including casual, term, and permanent employees, are asked to disclose and provide proof of full COVID-19 vaccination status by October 28, 2021 to the Workplace Safety and Health Coordinator. An initial informal confirmation of vaccination status will occur by September 24, 2021 via a secure online survey. This will assist in identifying the number of testing kits needed. The official collection of proof of vaccination will occur at the employee’s work location during scheduled visits by the Workplace Safety and Health Coordinator.

Employees and volunteers who are not fully vaccinated against COVID-19 or who do not disclose their COVID-19 vaccination status will be required to undergo COVID-19 testing up to three times per week until they have provided proof that they are fully vaccinated.

New Employees and Volunteers

All persons offered casual, term, or permanent employment, or engagement as volunteers in the Division after September 2, 2021, will be required to disclose and provide proof of full COVID-19 vaccination status at the time of hire or engagement. Newly hired employees or volunteers who are not fully vaccinated against COVID-19 will be required to undergo COVID-19 testing up to three times a week, until they have provided proof that they are fully vaccinated.

Accommodation

Notwithstanding the foregoing and consistent with its human rights obligations, the Division will duly accommodate employees who are legally entitled to accommodation to the point of undue hardship. All employees requesting accommodation must participate in the accommodation process and provide reasonable and necessary information requested by the Division related to the accommodation request, failing which the Division may be unable to provide any accommodation.

Visitors

A visitor is defined as anyone other than:

1. A Divisional employee assigned to work at the school or facility;
2. An itinerant Divisional employee whose duties require them to attend the school or facility;
3. An employee of an organization or person affiliated with an organization that leases space from the Division in the school or facility, unless requirements or Public Health Orders expressly direct a different standard or timeline be applied to the employees or affiliates of the organization; who has direct contact with vulnerable populations, including children.

For greater clarity, public health and safety, social welfare and/or emergency response personnel (such as police officers, first responders, social workers or public health nurses) performing duties in scope of their legal authority or professional responsibilities may still attend schools to carry out their duties. These personnel must however, at all times must maintain compliance with general safety measures, when applicable and warranted. These general safety measures include: mandatory use of medical masks when in the presence of pupils in indoor settings; maintaining physical distancing; proper hygiene measures, such as frequent handwashing and hand sanitization; self-monitoring for symptoms of COVID-19; and self-isolating or staying at home when sick.

In order to reduce the risk of transmission of COVID-19 in the Division's schools and facilities, visitor access to buildings will be restricted. Beginning September 17, 2021, to attend at the premises of the Division, all visitors born on or before December 31, 2009 must provide proof that they are fully vaccinated.

Policy Review

This policy will be reviewed and will be revised or rescinded, as established requirements, Public Health Orders and/or conditions warrant.

Procedures

- A. The Division will accept as proof of COVID-19 vaccination status the digital or physical version of the [Manitoba Immunization Card](#). Other forms of proof will be assessed by the Division according to guidance provided by the Manitoba School Boards Association.
- B. Collection of personal health information will comply with the provisions of the [Personal Health Information Act](#), [Park West AP205A FIPPA](#), and [Park West AP207A Personnel Files](#).
- C. Personnel responsible for hiring new employees or engaging new volunteers will verify the full vaccination status of applicants.
- D. Employees and volunteers required to submit COVID-19 test results up to three times per week, as per GUIDELINES B and/or C, must do so according to the schedule determined by the Division, prior engaging in direct contact with a pupil.

An employee or volunteer who is not at work or not on site on a day that they are scheduled to provide their test result, must provide it the day of their return to work or to the facility, prior to entering a school facility and/or prior to entering into direct contact with a pupil. In the event that the Workplace Safety and Health Officer is not present on the day of return, the proof of test result may be provided to the school principal or divisional supervisor.

For the purposes of **GUIDELINES B** and **C**, the Division will accept the results of: A self-administered rapid test as defined by the Division (see Appendix A - COVID-19 Testing of Staff, Volunteers or Visitors).

An employee or volunteer receiving a positive test result following such a test must:

- Attend a Province of Manitoba Testing Site for a confirmatory test;
- Isolate and follow the advice of public health; and
- Return to work upon the advice of public health.

- E. Requests for accommodation for the exemption of COVID-19 testing must be accompanied by the information required by GUIDELINE D and will be reviewed by the Division.
- F. The Superintendent of Schools will:
 - Closely monitor the requirements and recommendations of the Department of Education, Manitoba Public Health and the Governments of Manitoba and of Canada,
 - Advise the Board of any changes in circumstance which may impact the need and/or application of this policy,
 - Recommend policy revisions, including rescindment, for the Board's consideration.
- G. Any breach of this Policy by a Divisional employee or volunteer, including the provision of false and/or misleading information, may result in discipline, up to and including termination of employment or revocation of volunteer privileges.

- H. Any breach of this Policy by a visitor, including the provision of false and/or misleading information, may result in revocation of visitation privileges.
- I. Consistent with [Policy 11 General Executive Constraint Decision-Making Matrix, the Board](#) authorizes the Superintendent to modify the policy on an interim basis to comply with emergent Public Health Orders, guidance received from a relevant authority or other situations, subject to the conditions below:
- Any interim modification to the policy made by the Superintendent will take effect immediately.
 - The Superintendent shall, within forty-eight (48) hours, inform the Chair and Vice-Chair of any interim modification made to the policy.
 - The Superintendent shall, at the next regular meeting of the Board, inform the Board of any interim modification made to the policy and recommend formal adoption of the modifications.
 - Actions taken by the Superintendent are subject to Board review.

Appendix A - COVID-19 Testing of Staff, Volunteers or Visitors

This Administrative Protocol outlines procedures related to COVID-19 testing of staff, volunteers or visitors. These procedures apply in situations where an employee, volunteer or visitor is required to submit COVID-19 test results under Park West AP 718 Mandatory COVID-19 Testing of Staff & Visitors. In accordance with GUIDELINE G of the aforementioned policy, these procedures are subject to change based on the advice of public health officials.

In order to reduce the risk of transmission of COVID-19, the Division will restrict visitor access to buildings and determine whether and which visitors must comply with the requirements. Effective September 7, 2021, all divisional visitors born on or before December 31, 2009 must provide proof that they are fully vaccinated.

1. Prior to the commencement of the workday and/or prior to entering into direct contact with a pupil, an employee or volunteer or visitor that has not provided proof that they are fully vaccinated must self-administer a COVID-19 rapid test, or other test as specified by the Division, up to three times per week according to the schedule determined by the Division. At the discretion of the Division, employees and/or volunteers or visitors may be provided all testing supplies.
2. When rapid testing is specified by the Division as the testing method, three rapid tests must be self-administered each week for all persons who work or volunteer on a full-time basis, of which a minimum of one rapid test must be self-administered on-site with designated test supervision. The schedule of on-site self-administration will be determined by the Division. Sample schedules for employees working or volunteers being engaged daily:
 - i. On-site – Monday; at home – Wednesday & Friday
 - ii. On-site – Tuesday; at home – Thursday & Monday
 - iii. On-site – Wednesday; at home – Friday & Monday
 - iv. On-site – Thursday; at home – Monday & Tuesday
 - v. On-site – Friday; at home – Monday & Wednesday
 - vi. On-site – two or more days per week.

As per 2vi above, at the discretion of the Division, employees and/or volunteers may be required to undergo supervised on-site self-administration on a more frequent basis.

3. The period of time between the self-administration of tests will not exceed 48 hours during the week, and self-administration of tests will not exceed 48 hours prior to engaging in direct contact with pupils, whichever is applicable to every employee or volunteer or visitor.

4. Should an employee or volunteer or visitor fail to undergo rapid testing within 48 hours prior to engaging in direct contact with pupils, they must not attend the workplace or facility and, for all employees and volunteers, must immediately notify their principal/supervisor or other person designated by the Division.
5. Appointments for on-site self-administered testing will be scheduled in advance. Ideally, appointments will be scheduled prior to the beginning of the employee's workday or volunteer's engagement. However, planning will allow for travel time by the Workplace Safety and Health Coordinator to the school facility. Walk-ups are not permitted.
6. Supervised on-site self-administered testing will take place at the local work site. Employees and/or volunteers are to arrive at scheduled appointment times, not earlier. Employees and/or volunteers will observe physical distancing while waiting, don a medical mask upon entering, perform hand hygiene upon entering, self-monitor for COVID-19 symptoms before attending the onsite supervision, and self-isolate when sick.
7. An employee who is not at work, or a volunteer who is not on site, on a day that they are scheduled to self-administer the rapid test on-site, must cancel their appointment as far in advance as possible and notify the Workplace Safety and Health Coordinator. The employee and/or volunteer is required to schedule another appointment on the day of their return to the school facility, prior to entering the school facility and/or prior to entering into direct contact with a pupil.
8. Testing will not occur during periods of extended leave (one week duration or longer), but testing must resume no more than 48 hours prior to returning to the workplace and/or facility.
9. Prior to the commencement of the workday on days they are scheduled to self-administer rapid testing at home, employees must report the date of administration and test result to the Workplace Safety and Health Coordinator by email.
10. The results of self-administered tests conducted at home may be subject to verification by the Division. Home test results must be recorded on the form provided under Part IV of the September 11, 2021 memorandum issued by the Manitoba School Boards Association.
11. The Division will designate the Workplace Safety and Health Coordinator as the primary test supervisor for supervision of self-administered on-site rapid testing of employees and volunteers.

12. At all times, on-site rapid testing is to be self-administered by those employees or volunteers who are subject to mandatory testing requirements. Test supervisors must not themselves administer tests.
13. After self-administering rapid testing under supervision, employees and/or volunteers must record the date of administration and test result.
14. The test supervisor will:
 - i. Monitor on-site self-administration of rapid tests by employees;
 - ii. Ensure that the sampling and testing procedures are completed effectively and in keeping with guidelines;
 - iii. Verify and witness rapid test results;
 - iv. Respect employee or volunteer privacy and confidentiality as required by [Park West AP207A Personnel Files](#).
 - v. Provide direction to supervised employees or volunteers regarding the safe, on-site disposal of completed test units;
 - vi. Receive training on and implement applicable workplace safety and health protocols, including those related to handling and disposal of hazardous and/or medical waste; and
 - vii. Wear required personal protective equipment as provided by the Division (i.e., medical mask, protective eyewear and/or face shield, impermeable latex gloves, and medical gown).
15. Should a rapid test yield positive results—whether conducted at home or on site, the employee or volunteer bears the responsibility to immediately self-isolate and should seek confirmation of test positivity by completing a Polymerase Chain Reaction (PCR) COVID-19 test at the nearest Provincial testing site, at the earliest possible time.

To be clear, the Division is not responsible for reporting positive test results to Public Health, based on an at-home or on-site rapid test. If the employee's or volunteer's PCR test confirms positivity, public health notification and contact tracing measures will be operationalized.

16. The Division will provide for secure retention, retrieval and destruction of all records, in compliance with privacy, confidentiality and all safeguards concerning the protection of personal health information as specified by the Personal Health Information Act, of the [Personal Health Information Act](#), [Park West AP205A FIPPA](#), and [Park West AP207A Personnel Files](#).

Legal References:

[Public Schools Act \(Manitoba\) 41\(1\)](#)

[Workplace Safety and Health Act \(Manitoba\) 4\(1\) & 4](#)