

## GUIDANCE ON TRACKING COVID-19 VACCINATION STATUSES OF LEARNERS

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### PURPOSE

To provide Toronto Region healthcare and academic institutions with guidance on tracking the COVID-19 vaccination status of health professional learners and instructors from academic institutions that teach at the clinical placement site.

### BACKGROUND

Ontario's public health units and healthcare institutions began administering vaccinations against the COVID-19 virus to eligible recipients in December 2020; eligible populations include healthcare workers and patient-facing healthcare professional learners [1]. As healthcare professional learners move across healthcare institutions for clinical training, it is challenging for these institutions to individually track learners' COVID-19 vaccination statuses and for learners to report this information at each placement. With increasingly more learners being vaccinated, it is important for both academic and healthcare institutions to establish a coordinated approach in ensuring COVID-19 vaccination statuses (i.e., not, partially, or fully vaccinated) are tracked [2].

On August 17, 2021, the Government of Ontario issued [Directive #6](#), mandating hospitals and home and community care service providers have a COVID-19 vaccination policy for employees, staff, contractors, students, and volunteers in high-risk settings. Such policy must require these individuals to provide proof of one of the following: full vaccination against COVID-19 or medical reason for not being vaccinated against COVID-19. Completion of a COVID-19 vaccination educational session may be required. Those not vaccinated must submit to regular point of care testing for COVID-19 and demonstrate a negative result, at intervals to be determined by the hospital, which must be at minimum once every seven days. These tests will be administered by the clinical site. [3].

### GUIDING PRINCIPLES FOR TRACKING COVID-19 VACCINATION OF LEARNERS

These guiding principles are designed for both academic and healthcare institutions to follow:

- 1. Collaboration & trust:** Follow a unified approach to tracking learners' COVID-19 vaccination statuses.
- 2. Adherence to applicable legislation and policies:** Adhere to Personal Health Information Protection Act (PHIPA) and uphold their organizations' privacy policies on sharing and utilizing data related to vaccination statuses of learners.
- 3. Safety & minimizing risk:** Only utilize a learner's vaccination status to ensure safety of learners, patients, staff, and any related persons whose health may be impacted by the status.

### ASSUMPTIONS

The recommended approach outlined below for academic and healthcare institutions are based on these assumptions of existing practice which has been in place historically and before the onset of the pandemic:

- Hospitals define the eligibility criteria for placement at its site(s).
- Academic institutions will confirm and ensure that the learner meets the hospital's eligibility criteria for placement.
- Academic institutions support their learners in meeting hospitals' eligibility criteria for placements.
- Academic institutions keep internal records of the immunization status of learners and instructors from the academic institution who teach at the clinical site for vaccine-preventable diseases (e.g. varicella, measles/mumps, etc.).

## RECOMMENDED APPROACH

**1. Academic institutions collect and keep internal records of the COVID-19 vaccination status of learners and instructors from the academic institution who teach at the clinical site.**

As learners may be placed at various sites throughout the year, academic institutions are best suited to collect and maintain, at a minimum, data on whether each of their learners have been fully vaccinated or not.

Academic institutions will ask learners for proof of COVID-19 vaccination. The same conditions apply to instructors from the academic institution teaching at the clinical site.

Such information should be collected and maintained in alignment with applicable laws, regulations, and policies, particularly those safeguarding the privacy of learners.

**2. Healthcare institutions will rely on academic institutions to ensure COVID-19-related information about learners and instructors is maintained.**

As healthcare institutions trust their academic institutions (i.e. education partners) to ensure that learners have met all necessary requirements prior to clinical placement, they will similarly rely on academic institutions to maintain learners' COVID-19 vaccination statuses and provide this information to them when requested.

Hospitals may contact the academic institution to verify a learner's COVID-19 vaccination status or proof as appropriate and on a case-by-case basis. The same conditions apply to instructors from the academic institution teaching at the clinical site.

**3. Academic institutions will notify hospitals if an instructor or learner they intend to place is not vaccinated against COVID-19.**

In cases where a learner is not vaccinated, but the academic institution intends to place the learner, the academic institution will keep record of proof of medical exemption, and/or proof of completion of a COVID-19 education session approved by the placement site. The academic institution will also notify the hospital where they intend to place the learner that the learner is not vaccinated. The hospital and the academic institution will discuss the approach to this learner's placement on a case-by-case basis. The same conditions apply to instructors from the academic institution teaching at the clinical site.

**4. Communicate to learners the reason for tracking their COVID-19 vaccination statuses.**

Academic institutions are recommended to communicate and clearly explain to learners that they will be internally tracking COVID-19 status in addition to status of vaccinations for other vaccine-preventable diseases it already tracks to help the academic institution determine whether the student meets the eligibility criteria for placement set by the healthcare institution. It may also be noted to learners that learners should work with the placement site and academic institution if the placement site requires more information about the learner's COVID-19 vaccination status. Academic institutions may choose to utilize and adapt the sample letter provided in **Appendix A** to communicate this requirement and reasons. Where appropriate, this approach may be applied to instructors from the academic institution.

## REFERENCES

- [1] Government of Ontario, "COVID-19 vaccines for Ontario," 2021. [Online]. Available: <https://covid-19.ontario.ca/covid-19-vaccines-ontario>.
- [2] Toronto Region COVID-19 Hospital Operations, "Guidance related to the emerging challenges of COVID-19 Variants of Concern and Approach to Vaccinated Staff: Recommendations for Hospitals," Toronto, 2021.
- [3] Government of Ontario, "Directive #6 for Public Hospitals within the meaning of the Public Hospitals Act, Service Providers in accordance with the Home Care and Community Services Act, 1994," 17 August 2021. [Online]. Available: [https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination\\_policy\\_in\\_health\\_settings.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/directives/vaccination_policy_in_health_settings.pdf). [Accessed 19 08 2021].

**APPENDIX A: SAMPLE LETTER FOR ACADEMIC INSTITUTIONS TO CUSTOMIZE AND SEND TO THEIR PATIENT-FACING LEARNERS TO COMMUNICATE THE NEED TO REPORT COVID-19 VACCINATION STATUSES**

*Dear Learner,*

*As Ontario's healthcare institutions continue to vaccinate learners according to the province's vaccine distribution implementation plan, to safeguard the health of you, your peers, and patients that you are/will be caring for, please notify the [official name of student office that will house the data] by emailing [email address of person responsible for entering or managing the data] with the following by [month day, year]:*

- *Your COVID-19 vaccination status: not vaccinated, received first dose, fully vaccinated (received both doses)*
- *[If available] proof or documents related to your COVID-19 vaccination.*

*We will keep this information for internal records. Please note that should your placement site specifically require your COVID-19 vaccination status, further coordination and information may be requested from you.*

*We thank you for your co-operation.*

*Best regards,*

*[Name of Dean or Head of Academic Institution's Program]*

*[Name of Academic Program, Name of Academic Institution]*