MANDATORY COVID-19 TESTING OF STAFF & VISITORS

The Swan Valley School 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. These Orders were published on September 24, 2021.

Manitoba Education published 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 procedure 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 2009In accordance with the September 24, 2021 directives published by Manitoba Education on "immunization and testing requirements" educational workers including but not limited to teachers, educational support staff, school administration staff, custodial staff and cleaning staff, bus drivers, transportation staff, maintenance staff, 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."
- To comply with these requirements, the Division has developed these policies, subject to the **GUIDELINES** and **PROCEDURES** below, 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 mandates 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 procedure, "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

A. Staff/Volunteer

a) All persons employed or engaged by the Division as of September 24, 2021, including casual, term, and permanent employees are asked to disclose and provide proof of full COVID-19 vaccination status by September 24, 2021, to their Principal or Supervisor.

b) 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.

B. New Employees and Volunteers

a) All persons offered casual, term, or permanent employment, or engagement as volunteers in the Division after September 24, 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.

C. Visitors

A visitor is defined as anyone other than:

a) a Divisional employee assigned to work at the school or facility;

b) an itinerant Divisional employee whose duties require them to attend the school or facility;

c) 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 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 schools and facilities, visitor access to buildings will be restricted. Beginning **September 24, 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 and/or provide proof of negative COVID-19 results at the discretion of the Division.

Procedure Review

This procedure 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.

B. Collection of personal health information will comply with the provisions of the Personal Health Information Act.

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.

   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 Administrative Protocol: COVID-19 Rapid Testing of Staff).

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

   i. attend a Province of Manitoba Testing Site for a confirmatory test;

   ii. isolate and follow the advice of public health; and

   iii. 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:

   i. closely monitor the requirements and recommendations of the Department of Education, Manitoba Public Health and the Governments of Manitoba and of Canada,

   ii. advise the Board of any changes in circumstance which may impact the need and/or application of this procedure,

   iii. recommend procedure revisions, including rescindment, for the Board's consideration in accordance with

G. Any breach of this Procedure 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 Procedure by a visitor, including the provision of false and/or misleading information, may result in revocation of visitation privileges.

I. The Board authorizes the Superintendent of Schools to modify the procedure 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:

   i. Any interim modification to the procedure made by the Superintendent of Schools will take effect immediately.

ii. The Superintendent of Schools shall, within forty-eight (48) hours, inform the Chair and Vice-Chair of any interim modification made to the procedure.

iii. The Superintendent of Schools shall, at the next regular meeting of the Board, inform the Board of any interim modification made to the procedure and recommend formal adoption of the modifications.

iv. Actions taken by the Superintendent of Schools are subject to Board review.

v. Actions taken by the Superintendent of Schools shall be consistent with the overall procedure of the Board.

vi. 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. 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 in Division schools and facilities, the Division may restrict visitor access to buildings and/or, at divisional discretion, determine whether and which visitors must comply with the requirements. At the discretion of the Division, beginning September 24, 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. Refer to the procedure and to question 2 under the September 11, 2021 guidance provided by the Manitoba School Boards Association, for the definition of “visitor”.

1. Prior to the commencement of the workday and/or prior to entering into direct contact with a pupil, an employee or volunteer 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 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.

4. Should an employee or volunteer 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 must be made in advance. Appointments must be scheduled prior to the beginning of the employee's workday or volunteer's engagement and, when applicable, allow for travel time from the test site to the school facility. Walk-ups are not permitted.
6. Supervised on-site self-administered testing will take place at: SVRSS, Benito, Bowsman, Bus Garage, Minitonas, and the SVSD Administration Office and other designated sites. Principals/supervisors will be provided with a schedule. Testing may be virtual using zoom. 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 principal/supervisor. 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 or workplace 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 record in the date of administration and test result.
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 by the Division.
11. The Division will designate test supervisors 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 in 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
    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.