

COVID-19 POLICY			
Effective Date	September 21, 2021	Policy Type	Administrative
Responsibility	President and CEO	Cross-Reference	Student Misconduct: Academic and Non-Academic Policy
Approver	Executive Council	Appendices	Appendix 1 – Procedure to Provide Proof of Vaccination Appendix 2 – Vaccine Medical Exemption Letter Template
Review Schedule	Quarterly		

1. Policy Statement

- 1.1. GPRC is committed to protecting the health and safety of all students, staff, and community members who access our facilities. GPRC and all students, staff, and community members have obligations to ensure the health and safety of everyone who participates in events at GPRC.
- 1.2. Immunization against COVID-19 is the most effective means to prevent the spread of COVID-19, to prevent outbreaks on our campuses, and to protect our students, staff, and community members.
- 1.3. To that end, GPRC adopts this Policy to protect the health and well-being of our students, community members, and communities during the COVID-19 pandemic.

2. Background

- 2.1. A public health emergency was declared on September 15, 2021 for the Province of Alberta having determined that additional measures are necessary to protect Albertans from exposure to COVID-19 and to prevent the spread of COVID-19.
- 2.2. As of September 19, 2021, GPRC, as a publicly funded post-secondary institution as identified in the Post-Secondary Learning Act (PSLA), is exempt from cafeteria and physical distancing restrictions outlined in Order 42-2021 upon implementation of a proof of vaccination policy.

3. Policy Objective

- 3.1. To set out COVID-19 proof of vaccination requirements to protect the health and safety of all GPRC students, staff, and community members.
- 3.2. To set out procedures for compliance of this policy.

4. Scope

- 4.1. This policy applies to all current and prospective members of the GPRC community including students, staff, and community members.
 - 4.1.1. “Students” refers to all current students of the GPRC community, including:
 - 4.1.1.1. Individuals who have been admitted/registered to GPRC on either a part-time or full-time basis.
 - 4.1.1.2. Individuals who have been admitted to a GPRC Collaborative Degree Program.

- 4.1.2. “Staff” refers to: all current employees of GPRC; consultants; and, service and supply contractors and their employees while they are engaged in activities related to GPRC.
- 4.1.3. “Community Members” refers to visitors and volunteers.

5. Definitions

- 5.1. “PCR test” means the polymerase chain reaction test for COVID-19.
- 5.2. “Proof of vaccination” refers to one or more of the following:
 - 5.2.1. Proof that the student, staff, or community member has been vaccinated with at least their first dose of COVID-19 vaccine approved by the World Health Organization (WHO) no later than September 20, 2021 and be fully immunized with a COVID-19 vaccine approved by the WHO no later than November 1, 2021;
 - 5.2.2. Proof of a medical exemption;
 - 5.2.3. Proof of a negative COVID-19 test result from a sample that is taken within the prior 72 hours; or
 - 5.2.4. Proof of COVID-19 diagnosis in the six weeks prior.
- 5.3. “Rapid test” means a COVID-19 testing device that is listed in *Authorized medical devices for uses related to COVID-19: List of authorized testing devices by Health Canada* published on the Government of Canada website and is approved for point-of-care molecular or antigen COVID-19 testing.
- 5.4. “Vaccine medical exemption letter” means written confirmation provided to GPRC by an authorizing health professional which verifies there is a medical contradiction to vaccination that prevents the person from being vaccinated that is valid for a period of no longer than one year from the date on which it is made and clearly sets out the information below:
 - the name of the patron or attendee to whom the exception applies;
 - the name, phone number, contact information, professional registrations number, and signature of the authorizing health professional;
 - the date on which the written confirmation was provided; and
 - the length of time the exemption is valid.

6. Guiding Principles

- 6.1. GPRC is committed to protecting the health and safety of its students, staff, and community members.
- 6.2. This policy shall be reviewed regularly, at least every four (4) months, to ensure alignment with public health measures and regulations, and to confirm it adequately covers the health and safety risks it addresses.
- 6.3. GPRC will require all students, staff, and community members to provide proof of vaccination in order to attend any GPRC campuses or activities after September 20, 2021. GPRC will require all students, staff, and community members to provide proof of vaccination for COVID-19 in accordance with the Procedure in Appendix 1 or through a medical exemption (template in Appendix 2).
- 6.4. Proof of vaccination is being collected to protect the health and safety of GPRC students, staff, and community members.
- 6.5. Proof of vaccination collected under this Policy shall be securely and confidentially verified and used only as necessary to determine fit for work/fit to learn status of students, staff, and community members required or requesting to attend GPRC’s campuses or activities, to manage and administer employment and other working relationships, to address accommodation requests, and to comply with all applicable laws, such as the Occupational Health and Safety Act (Alberta).
- 6.6. Proof of vaccination information is collected under the authority of Section 33(c) of the Freedom of Information and Protection of Privacy Act (Alberta) and shall be used, accessed, and disclosed in accordance with the legislation and relevant GPRC records management policies.
- 6.7. Students failing to comply with this Policy and Procedure may be disciplined in accordance to the Student Misconduct: Academic and Non-Academic Policy.

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- 6.8. Staff failing to comply with this Policy and the Procedure may be placed on an unpaid leave of absence or otherwise removed from service.

7. Roles and Responsibilities

Stakeholder	Responsibilities
Board of Governors	<ul style="list-style-type: none">• Received for Information.
Executive Council	<ul style="list-style-type: none">• Approve and formally support this policy.• Inform Community Members and Students about this policy.• Clearly define the roles and responsibilities within this policy.• Regularly review this policy.

8. Exceptions to the Policy

- 8.1. GPRC will reasonably accommodate, to the point of undue hardship, a GPRC Student, Staff, or Community Member who is unable to be vaccinated for COVID-19 due to a protected ground under the Alberta Human Rights Act.
- 8.2. Executive Council may make additional procedures for the appropriate implementation of this policy.

9. Inquiries

- 9.1. Staff inquiries will be handled by the Executive Director of Human Resources.
- 9.2. Student inquiries will be handled by the Vice President Academic and Research.
- 9.3. Community member inquiries will be handled by the host department.

10. Amendments (Revision History)

- 10.1. Approved by Executive Council September 16, 2021
- 10.2. Revised by Executive Council September 17, 2021
- 10.3. Revised and approved by Executive Council September 21, 2021

Appendix 1 – Procedure to Provide Proof of Vaccination

1. Staff:
 - 1.1. Upon implementation of this policy or time of hire, staff will provide proof of vaccination to Human Resources, according to the dates listed in the policy, in-person or electronically via staffcovid@gprc.ab.ca
 - 1.1.1. Contract managers, or delegate, will notify contractors of this policy and implications for access to GPRC Campuses.
 - 1.1.2. Service and supply contractors are responsible for compliance of their employees working on GPRC campuses.
 - 1.2. Human Resources will verify, record, and confirm receipt of proof of vaccination.
 - 1.3. Human Resources will notify senior leaders and direct reports of executive members of the status of receipt of proof of vaccination of their employees.
 - 1.4. Staff must provide proof of vaccination by September 20, 2021.
 - 1.4.1. If applicable, staff must provide additional proof of vaccination by November 1, 2021.
 - 1.5. Staff who do not provide proof of vaccination by September 27, 2021 will be placed on unpaid leave or otherwise removed from service.
2. Students:
 - 2.1. GPRC admitted/registered and GPRC Collaborative Degree Students
 - 2.1.1. Upon implementation of this policy or prior to the first day of classes, students must provide proof of vaccination to the Registrar's Office, according to the dates listed in the policy, through the online form found in myGPRC.
 - 2.1.2. The Registrar's Office will verify, record, and confirm receipt of proof of vaccination.
 - 2.1.3. An automated list of active students enrolled in on campus courses who have not submitted proof of vaccination will be shared with the Registrar and Deans daily.
 - 2.1.4. An automated email will be sent daily to active students enrolled in on-campus courses daily who have not submitted proof of vaccination.
 - 2.2. Continuing Education Students
 - 2.2.1. Upon implementation of this policy or prior to the first day of classes, students must provide proof of vaccination to the Continuing Education Office, according to the dates listed in the policy, in-person or electronically via ce@gprc.ab.ca.
 - 2.2.2. The Continuing Education Office will verify, record, and confirm receipt of proof of vaccination.
 - 2.2.3. Failure to provide proof of vaccination will result in registration cancellation.
 - 2.3. Conservatory Students
 - 2.3.1. Upon implementation of this policy or prior to the first day of classes, students must provide proof of vaccination to the Conservatory Assistant according to the dates listed in the policy, in-person or electronically via conservatory@gprc.ab.ca.
 - 2.3.2. The Conservatory Assistant will verify, record, and confirm receipt of proof of vaccination.
 - 2.3.3. Failure to provide proof of vaccination will result in registration cancellation.
3. Residence Tenants:
 - 3.1. Upon implementation of this policy tenants must provide proof of vaccination to the Residence Office according to the dates listed in the policy, in-person or electronically gpresidence@gprc.ab.ca for GP Campus Residences or fvresidence@gprc.ab.ca FV Campus Residences.
 - 3.2. The Residence Office will verify, record, and confirm receipt of proof of vaccination.
 - 3.3. It is the residence tenants'/students' responsibility to ensure their visitors are in alignment with this policy and will be held responsible.
 - 3.4. Failure to provide proof of vaccination will result in eviction.
4. Community Members:

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- 4.1. Upon implementation of this policy, community members must provide proof of vaccination to GPRC through the department in which they are visiting/volunteering in-person or electronically beforehand.
- 4.2. The host department will verify proof of vaccination.
- 4.3. Failure to provide proof of vaccination will result in cancelation of visit/service.

Appendix 2 – Vaccine Medical Exemption Letter Template

Statement of Medical Exemption for COVID-19 Vaccination

SECTION 1 – REQUESTER INFORMATION		
Last Name	First Name	
GPRC Student ID Number or Employee Number (if applicable)		
Address		
City/Town	Province	Postal Code

SECTION 2 – IMPORTANT INFORMATION

Grande Prairie Regional College (GPRC) requires that all students, staff, and community members attending our campuses be vaccinated against COVID-19, provide proof of an approved medical exemption, or provide proof of a negative test result for COVID-19 by September 20, 2021 according to the [COVID-19 Policy](#).

In order to request a valid exemption for medical reasons, a student/staff/community member must complete this Statement of Medical Exemption form and submit the entire completed form to GPRC directly from a physician or nurse practitioner.

By submitting this form, I am asking that I/my child be exempted from vaccination requirements due to a medical condition. I certify that the information below was completed by myself / my child, and my/my child's physician or nurse practitioner.

1. I understand that should an outbreak occur, Alberta Health Services or GPRC may impose additional restrictions or requirement on me/my child for health and safety reasons which may not apply to others on campus who have been fully vaccinated.

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2. I understand that GPRC may require me/my child to follow additional health and safety protocols, including, but not limited to:
 - a. Mandatory COVID testing and disclosure of test results;
 - b. Masking and/or physical distancing; or
 - c. Remote working/learning.
3. I accept full responsibility for my / my child's health.
4. I understand and agree to comply with and abide by all GPRC COVID-19 policies and procedures, as amended from time to time.
5. I certify that the information below and attached is accurate and complete. I understand that I may be subject to disciplinary action if any of the information I provided in support of this exemption request is false.

Please note. "My child", "Parent", and "Legal Guardian" only applies when the medical exemption is for someone under 18-years of age.

Signature of Student/Staff/Parent/Legal Guardian	Date
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Risks of not being vaccinated:

You may be more likely to be exposed to the COVID-19 virus than others if you live in a group setting or participate in group activities in closed/crowded spaces where the COVID-19 virus may transmit more easily.

COVID-19 can result in severe illness. Those who are at particular risk of developing more severe disease or outcomes from COVID-19 are people:

- who are an older adult (increasing risk with each decade, especially over 60 years)
- of any age with chronic medical conditions, including: lung disease, heart disease, high blood pressure, diabetes, kidney disease, liver disease, dementia, or stroke
- of any age who are immunocompromised, including those with an underlying medical condition, such as cancer or those taking medications which lower the immune system, such as chemotherapy
- living with obesity, such as having a body mass index (BMI) of 40 or higher

Vaccination is one of the most effective ways to protect our families, communities, and ourselves against COVID-19. Evidence indicates that vaccines are effective at preventing serious outcomes, such as severe illness, hospitalization, and death due to COVID-19. A growing body of evidence indicates that people fully vaccinated are less likely to have asymptomatic infection or to transmit COVID-19 to others.

Sources:

<https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/prevention-risks.html#vaccination>

<https://www.cdc.gov/coronavirus/2019-ncov/science/science-briefs/fully-vaccinated-people.html>

Please provide this form to your physician or nurse practitioner for completion.

SECTION 3 – DECLARATION OF PHYSICIAN OR NURSE PRACTITIONER

The [College of Physicians and Surgeons of Alberta \(CPSA\)](#) has advised all Physicians as follows:

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The COVID-19 vaccine is safe and effective for nearly every individual aged 12 or older. There are no medical conditions that would universally warrant a complete exemption from initial COVID-19 vaccine. A physician's informed clinical judgement that an exemption from COVID-19 vaccination is appropriate for a patient is expected to be exceedingly rare and must be thoroughly documented in the patient's chart. Physicians are expected to reassess COVID-19 vaccine exemptions periodically to account for updates to vaccination evidence and the potential emergence of newly-approved vaccines. Issuing "blanket" or "lifetime" exemptions would be considered unprofessional.

(CPSA, September 15, 2021. *Guidance for physicians: requests for COVID-19 vaccination exemptions.* <https://cpsa.ca/wp-content/uploads/2021/09/Guidance-for-Physicians-COVID19-Vaccine-Exemption.pdf>. Full document included in this document).

Given the stated rarity of these exceptions, and in light of the fact that vaccines have been proven to be both safe and effective, any notes written for patients who qualify for a medical exemption need to clearly specify:

- the medical reason for which the exemption is being given;
- whether the patient is partially immunized (i.e. received a first dose); and,
- a date by which the exemption expires and/or a date for reassessment.

I, _____
(Name of physician or nurse practitioner)

Certify that, due to a medical condition, the named person should be exempted from the requirements of Grande Prairie Regional College for persons attending on-campus activities to be vaccinated against COVID-19 with a Health Canada-approved or WHO-approved vaccine.

From _____ To _____

Please state the reason(s) for the accommodation request here.

Please describe the nature of the condition that precludes vaccination. Please state whether or not the condition is expected to be permanent. It is not necessary to provide a diagnosis.

<p>Please explain how this accommodation request complies with the CPSA and Alberta Public Health guidance set out above.</p>		
<p>SECTION 4 – Signature of Physician or Nurse Practitioner</p>		
<p>Name of Physician or Nurse Practitioner</p>		<p>Registration/Licence No.</p>
<p>Business Address</p>		
<p>Address</p>		
<p>City/Town</p>	<p>Province</p>	<p>Postal Code</p>
<p>Signature of Physician or Nurse Practitioner</p>		<p>Date</p>

The Physician or Nurse Practitioner must submit the properly completed form to covid19@gprc.ab.ca

The information provided on this exemption form is being collected under the authority of section 33(c) of the Freedom of Information and Protection of Privacy Act (FOIP Act) and in accordance with in accordance with the Chief Medical Officer of Health Order 42-2021, as outlined by the province of Alberta. This information will be used only for the purpose of determining eligibility for proof of a medical exemption as per GPRC’s COVID-19 Policy and will be only retained for the length of time necessary to fulfill the purpose for which it was collected. Information may also be disclosed to provincial or federal authorities if required by law. De-identified aggregated data will be used to track the overall vaccination level of the GPRC community.

Additional information on the privacy aspects of this program are available at gprc.me/COVID19. If you have any questions about the collection or use of this information, contact foip@gprc.ab.ca.



Guidance for physicians: Requests for COVID-19 vaccination exemptions

OVERVIEW

COVID-19 transmission remains a concern in our communities, and CPSA strongly recommends COVID-19 vaccination to anyone who is eligible. While COVID-19 vaccination is not mandatory in Alberta, an increasing number of schools, businesses and jurisdictions are now requiring students, staff and visitors to be fully vaccinated. This is driving an increased number of Albertans to clinics to request medical exemptions from COVID-19 vaccination.

CLINICAL DECISION-MAKING

CPSA continues to review the latest information on contraindications and precautions for COVID-19 vaccination. We advise physicians to inform their decision-making based on the [recommendations](#) from the Alberta Health Services COVID-19 Scientific Advisory Group and to familiarize themselves with the latest resources (see page 3) set out by Alberta Health, the National Advisory Committee on Immunization (NACI) and the Centers for Disease Control and Prevention (CDC).

Physicians have access to readily available information about specific conditions for certain patients for whom a first or second dose of COVID-19 vaccine should be recommended. It is clear the COVID-19 vaccine is safe and effective for nearly every individual aged 12 or older. There are no medical conditions that would universally warrant a complete exemption from initial COVID-19 vaccine. A patient's or physician's individual moral objection to vaccination is not considered sufficient clinical rationale for exemption of vaccination against COVID-19.

COVID-19 VACCINATION DURING PREGNANCY

COVID-19 vaccines are safe and effective for pregnant individuals and their babies, with mRNA vaccines being the safest type of COVID-19 vaccine to get during pregnancy. Patients may get the vaccine at any time, during any trimester, of pregnancy. A viral vector vaccine may be offered to pregnant individuals when other COVID-19 vaccines are contraindicated or inaccessible. AHS is reporting that the fourth wave of COVID-19 and the Delta variant could have significant adverse effects on unvaccinated pregnant patients:

- In August 2021, six pregnant Albertans were admitted to ICU due to COVID-19. All of them were unimmunized. Only seven pregnant Albertans were admitted to ICU for COVID-19 during the entire first year of the pandemic from March 2020 to March 2021.
- In the six cases that AHS saw in August 2021, COVID-19 had severe impacts on the parents' health and also the child's. Five preterm births occurred as early as 29 weeks.
- Pregnant patients are at a higher risk of severe disease and complications, such as ICU admission requiring ventilation and preterm birth. The threshold for admission is lower and they can get sick faster.
- Pregnant women with co-morbidities such as obesity, diabetes, and cardiovascular disease are potentially at higher risk of severe COVID-19 disease.



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MANAGING CHALLENGING INTERACTIONS

CPSA supports physicians who decline to issue exemptions when the patient making the request does not have a warranting medical condition. We also recognize interactions with patients on this topic may become emotional and difficult. If a patient becomes abusive toward a physician, staff member or other patients because a vaccination exemption request is denied, that patient may be asked to leave the premises. Physicians are not expected to tolerate this type of behaviour and have the right to immediately discharge patients who act in this manner from their practice under the [Terminating the Physician-Patient Relationship](#) standard of practice.

To avoid potential conflict with upset patients, CPSA is supportive of clinic staff screening patients before their arrival to determine if the nature of the visit is related to an exemption request. In some instances, these types of assessments may be conducted virtually to avoid an in-person confrontation. For assessments that must be conducted in-person, physicians may want to employ a buddy system to avoid being alone in a room, or advise the patient that they will be contacted at a later date, by phone, with a decision.

EXPECTATIONS FOR EXEMPTIONS

A physician's informed clinical judgement that an exemption from COVID-19 vaccination is appropriate for a patient is expected to be exceedingly rare and must be thoroughly documented in the patient's chart. Physicians are expected to reassess COVID-19 vaccine exemptions periodically to account for updates to vaccination evidence and the potential emergence of newly-approved vaccines. Issuing "blanket" or "lifetime" exemptions would be considered unprofessional.

In the rare event a physician provides a patient with an exemption from COVID-19 vaccination, the physician should clearly state in writing:

- The patient's name and contact information;
- The medical reason for which the exemption is being given;
- Whether the patient is partially immunized (i.e., received a first dose); and
- A date by which the exemption expires and/or a date for reassessment.

EVIDENCE-BASED ADVICE

The professional advice patients receive from their physicians is very likely to inform discussions with their schools, workplaces and businesses they visit. Knowing this, it is critical for advice from physicians on COVID-19 vaccination to be rooted in the latest evidence. All Albertans, including the rare few who would qualify for an exemption from COVID-19 vaccination, must also receive accurate and founded advice on how to mitigate risk in their communities. An exemption from COVID-19 vaccination should not be misinterpreted as a "free pass," and the patient should be made aware of their elevated risk of acquiring, transmitting and experiencing severe outcomes from COVID-19.



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CPSA continues to encourage all physicians to advocate in favour of public health precautions, such as indoor masking, physical distancing, monitoring for symptoms and heightened hygiene practices.

RESOURCES

1. [CPSA Patient FAQ: Exemption Requests for Vaccination](#)
2. [CPSA FAQ: Mask Use Exemption Letters](#)
3. [CPSA Patient FAQ: Exemption Requests for Mandatory Masking](#)
4. Alberta Health Services COVID-19 Scientific Advisory Group Rapid Brief. [Medical Exemptions for COVID-19 Vaccine: Jurisdictional Scan](#). September 7, 2021.
5. National Advisory Council on Immunization: [Statements and Publications](#).
6. Centers for Disease Control and Prevention. [COVID-19 Vaccine Information for Specific Groups](#).
7. Alberta Health. [COVID-19 Vaccine Questions and answers for the public and healthcare practitioners](#). July 13, 2021.