Workforce Safety & Employee Health

Administrative Policy A1701: COVID-19 Vaccination

COVID-19 Rapid Testing Program

October 28, 2021

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ADMINISTRATIVE POLICY A1701: COVID-19 VACCINATION

As an employer with a strong commitment to health and safety, the City of Edmonton will take every reasonable step to protect the health, safety and welfare of its employees and others from the hazard of COVID-19. The City determined that it is necessary for the protection of its workplace to maximize COVID-19 vaccination rates of its employees as a further control measure in mitigating the hazard of COVID-19. Administrative Policy A1701: COVID-19 Vaccination, and its related Procedure, outline the requirement for employees to be fully vaccinated against COVID-19, unless an exemption has been approved on the basis of a protected legal ground.

COVID-19 RAPID TESTING PROGRAM SCOPE

This program applies to all employees who have not provided proof that they will be fully vaccinated by November 15. The program testing requirement applies to employees working on City worksites as well as those working at home, as they could be required to attend the workplace for operational reasons.

COVID-19 rapid antigen testing (“rapid testing” or “rapid test”) is required starting November 1, 2021. Employees must receive a negative rapid test result in the 72 hours prior to November 1 in order to report for work on that date.

- **Proof of Negative Test:** Proof of a negative test result includes a written, printed or electronic copy of a result that indicates the employee has tested negative for COVID-19 on a Health Canada approved rapid antigen test. Valid test results must include the employee’s full name, the provider that completed the test, the type of test, date and time of sample collection, and a clear indication of a negative result.

- **Submitting Negative Test Result:** Employees who are participating in the rapid testing program will be required to fill out the designated COVID-19 Rapid Testing Program Pre-Shift Screening Form before each shift.

- **Positive Rapid Test Result:** If an employee’s rapid test is positive, the employee will be directed to follow Alberta Health Services guidance and to book a confirmation test. The employee is not to enter the worksite and must immediately notify their supervisor.

- **Ineligible Tests:** Test results cannot be from at-home kits or from the Alberta Health Services public COVID-19 testing system.

Rapid testing is a workplace control measure. Leaders and branch management will know whether an employee is on the testing program and will have access to information to ensure that the employee is complying.
Table 1 - Example Testing Schedules

<table>
<thead>
<tr>
<th>Work Schedule</th>
<th>Example Rapid Testing Schedule</th>
<th>Tests per week</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monday to Friday</td>
<td>Sunday and Wednesday</td>
<td>2</td>
</tr>
<tr>
<td>Sunday to Thursday</td>
<td>Saturday and Tuesday</td>
<td>2</td>
</tr>
<tr>
<td>Saturday</td>
<td>Friday</td>
<td>1</td>
</tr>
<tr>
<td>Hybrid Work Arrangement -</td>
<td>Sunday and Wednesday</td>
<td>2</td>
</tr>
<tr>
<td>Monday to Tuesday at home;</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wednesday to Friday in the</td>
<td></td>
<td></td>
</tr>
<tr>
<td>office</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**RAPID TESTING PROGRAM ELIGIBILITY**

To be eligible for a rapid test, an employee must meet the following conditions:

1. Have no symptoms of COVID-19;
2. Not be a household contact of someone who has tested positive for COVID-19 in the past 14 days;
3. Not been diagnosed with COVID-19 in the six weeks prior to the date of rapid testing; and
4. Meet any other requirements of the pharmacy/authorized provider.

If an employee has symptoms of COVID-19 or is a household contact of someone who has tested positive for COVID-19 in the past 14 days (and the employee is not fully vaccinated), the employee must isolate, contact their direct supervisor and follow direction from Alberta Health Services (AHS).

Employees who have tested positive for COVID-19 by AHS within the last 6 weeks will not be eligible for rapid antigen testing and will be granted a temporary exemption from the testing requirement. Employees must provide proof of a positive COVID-19 PCR test from Alberta Health Services to Disability Management to be granted the exemption. Disability Management will provide direction on pre-shift screening requirements during the 6 week temporary exemption. The exemption expires at the conclusion of six (6) weeks from the positive PCR test result and the employee will resume the rapid testing program if they have not yet submitted proof of full vaccination.

**RAPID TESTING PROCESS & REQUIREMENTS**

Employees must have taken a COVID-19 rapid antigen test within 72 hours of the start of every shift and provide proof of a negative result. This requirement applies whether the employee is working on site or at home as they could be required to attend the workplace for operational reasons.

Employees are responsible for scheduling their own tests at their own cost. Providers may require appointments to be scheduled. Employees are required to book their test outside of working hours, and employees will not be paid for their time while getting tested. Employees are required to show proof of a negative test through the designated
process. Employees must keep the record of their test for 14 days and may be asked for it by their leader, Workforce Safety and Employee Health or Labour Relations.

Only Health Canada approved Rapid Tests will be accepted. This does not include at-home testing kits or Alberta Health Services (AHS) provided PCR tests. Employees can identify a pharmacy, or other private provider, of their choice that offers Health Canada approved Rapid Antigen Tests. For your reference, Alberta Health has published a list of COVID-19 rapid testing third party health service vendors. The City has also created a list of rapid testing providers in the Edmonton and surrounding region. Employees may optionally reference this list of rapid testing providers in the City. This list is subject to change.

Cost of Testing

Employees are directly responsible for the full cost of rapid testing and any related fees such as charges for missed or late appointments or repeat testing due to inconclusive test results. It is estimated to cost $40/test. Rapid testing under the COVID-19 Vaccination Policy is not an eligible expense under the City’s health benefits plans.

Employees with an approved exemption on the basis of a protected legal ground through Disability Management or Labour Relations may be reimbursed for the cost of their test (to a maximum of $50 per test). Direction will be provided to those employees at the time of the exemption approval.

Rapid Testing & Pre-Shift Screening Checklist

Employees required to perform rapid testing must document their test completion status on a unique Rapid Testing & Pre-Shift Screening Checklist (the “Checklist”).

Before commencing work, the employee must complete the Checklist and report if they have completed a rapid antigen test within 72 hours prior to the start of their work shift and received a negative result. This form must be completed each day by all employees on the rapid testing program, regardless of work location.

Proof of Rapid Test Results

Each Branch will receive a list of employees that are required to perform rapid testing, and are responsible to ensure all identified employees are completing the Checklist.

Each Branch will be responsible for developing a process to confirm proof of rapid testing. As an option, rapid test records may be uploaded directly into the Checklist, which will be sent directly to the supervisor for review. Another option includes a visual check by the supervisor (or other designate) at the beginning of the employee's shift.

Important: Employees must keep a copy of their most recent test with them at all times during working hours. If an employee is asked to show proof of rapid
testing and they cannot produce the record, the employee will be sent home without pay. This would be considered non-compliance under this Program. Supervisors or designated work area contacts are required to notify Labour Relations when an employee has twice failed to provide proof of a rapid test result, without reasonable explanation.

**TEST RESULTS**

Rapid test results will be displayed as ‘negative’, ‘positive’, or ‘inconclusive’.

**Negative Rapid Test Result**

If the employee's rapid test is negative, the employee may proceed to work as long as the Pre-Shift Screening confirms the employee may do so. A copy of the test result must be with the employee at all times during work, and can be in the form of a written, printed or electronic copy. Valid test results must include the employee's full name, the provider that completed the test, the type of test, date and time of sample collection, and a clear indication of a negative result.

At-home test kit results or self-produced documentation of a negative test result is not valid.

**Positive Rapid Test Result**

If the employee's rapid test is positive, the employee cannot attend work and must contact their supervisor regarding the positive result. Rapid test results are considered preliminary and require further PCR confirmatory testing through Alberta Health Services (AHS). Appointments can be booked by calling 811 or online by completing the AHS COVID Self Assessment Tool. **The employee must book the AHS confirmatory PCR test in a timely manner (i.e. within 48 hours of their positive rapid test).**

Employees who screen positive on a rapid test are presumed to be positive for COVID-19 and are required to isolate for 10 days or until they receive a negative result on an AHS confirmatory PCR test.

If the AHS confirmatory PCR test is positive:

- The employee must continue to self-isolate for 10 days, or until symptoms resolve (if symptomatic), whichever is longer.
- The employee must provide proof of the positive COVID-19 PCR test from Alberta Health Services to Disability Management and then will be granted a **temporary exemption** from the testing requirement. Disability Management will provide direction on pre-shift screening requirements during the 6 week temporary exemption. At the conclusion of 6 weeks from the positive PCR test result the employee will resume the rapid testing program if they have not yet submitted proof of full vaccination.

If the AHS confirmatory PCR test is negative:

- The employee may report back to work, and only in this situation (i.e. confirmatory PCR test following positive rapid test result), the employee may use
Following notification of a positive rapid test by an employee, the supervisor must fill out the COVID-19 Employee Intake Form. The supervisor will update the test result status once the result from the AHS confirmatory PCR test is obtained. Employees will code their time according to the Compensation and Leave FAQ.

Inconclusive Tests

If a rapid test result is inconclusive, the employee is required to repeat the test. If after the second test, it is still inconclusive, the employee must follow the recommendation from the provider which may include booking a confirmation test through Alberta Health Services. The employee may not report to work with an inconclusive test result, and must contact their supervisor.

Table 2 - Summary of Actions for Rapid Test Results

<table>
<thead>
<tr>
<th>Test Result</th>
<th>Employee Action</th>
<th>Supervisor Action</th>
</tr>
</thead>
</table>
| Negative      | • Complete the Checklist and proceed to work as long as the Pre-Shift Screening confirms you may do so.  
                  • Keep a copy of the negative test result with you at all times.                          | • Visually confirm employee test result is negative and has been completed in the past 72 hours before their shift. |
| Positive      | • Do not proceed to work.  
                  • Contact your supervisor immediately regarding the positive test result.  
                  • Begin isolation, and follow AHS guidance.  
                  • Book a confirmatory PCR test with AHS. If the PCR test result is positive, provide proof from AHS to Disability Management. | • Complete the COVID-19 Employee Intake Form.  
                  • Code the employee as IWP for that shift.  
                  • Once the AHS confirmatory PCR test is received, update the COVID-19 Employee Intake Form to capture results and code time accordingly. |
| Inconclusive / Invalid | • Repeat the rapid test.  
                  • If the second test is inconclusive, do not proceed to work.  
                  • Contact your supervisor regarding the inconclusive test result.  
                  • Follow guidance from the test provider regarding further testing. | • Require the employee to send proof of the two inconclusive test results.  
                  • Code the employee as IWP for that shift.  
                  • Confirm that the employee is following the guidance from the test provider regarding further testing. |

Note: Employees must inform their supervisor immediately if they cannot produce a negative test result and therefore cannot report for work.

RESPONSIBILITIES

Employees are responsible for:

• Understanding and adhering to this program.
• Finding and booking an appointment with a pharmacy or authorized provider to obtain rapid antigen testing.
• Payment of all costs for the rapid testing and attending the test on their own time.
• Ensuring that rapid antigen testing is completed and results are received within 72 hours before the start of their shift (whether they are working on site or at home).
• Keeping a copy of their most recent test with them at all times during working hours, keeping records of each test result for at least 14 days, and providing records on request by their leader, Workforce Safety and Employee Health or Labour Relations.
• Completing the electronic form to report the results of rapid antigen testing and/or communicating the results to their supervisor (or designate).
• Informing their supervisor and submitting appropriate documentation if there is a change in vaccination status.
• Following next steps, as required, after receiving their rapid antigen testing results. This includes attending for a PCR test through AHS, self-isolating, etc.

Leaders are responsible for:

• Ensuring employees on this program submit test results; reviewing those results.
• Following up with employees who fail to provide proof of a negative test result to ensure the employee does not work that shift, is coded as leave without pay and knows they must provide proof of a negative test result before their next shift.
• Contacting or notifying Labour Relations when an employee fails to provide proof of a negative test result on two occasions.

Workforce Safety and Employee Health is responsible for:

• Collecting vaccine intake forms and vaccine records.
• Updating lists of employees eligible to be on the rapid antigen testing program and providing information to the business areas.
• Developing and maintaining the program, electronic forms, and reporting tools.
• Performing quality assurance checks to ensure safe work practices are followed.
• Reviewing temporary exemption requests and providing direction to employees.

CONSEQUENCES OF NON-COMPLIANCE

Under the COVID-19 Vaccination Policy, employees who do not provide proof they are fully vaccinated and do not comply with rapid testing are deemed unfit for work and will be placed on leave without pay.

If an employee fails to provide proof of any rapid test result they will not be permitted to attend work for that shift, or will be sent home, and they will not be paid. If an employee fails to provide proof of a rapid test result on a second occasion without reasonable explanation, they will be placed on leave without pay. Employees may only return from leave without pay in these circumstances if they commit to becoming fully vaccinated, provide proof they have received at least one vaccine injection and comply with rapid testing until they are fully vaccinated.
If an employee initially declines to participate in the rapid testing program and is placed on leave without pay, they may resume attending work (assuming their employment has not yet been terminated), if they agree and commit to participation in the rapid testing program (i.e. provide a negative test result) or if they provide proof they are fully vaccinated.

Employees are required to report accurate and truthful information. Employees knowingly providing false or misleading information may be subject to discipline up to and including termination.

**EXITING THE RAPID TESTING PROGRAM**

The City strongly encourages all employees who are not fully vaccinated to meet with a physician to have a full and honest, two way dialogue about the benefits and risks of a COVID-19 vaccine. A letter to aid this conversation can be found here.

If you are required to comply with the Rapid Testing Program and become fully vaccinated, you must submit your vaccination record through the COVID-19 Vaccine Intake Form. Once your submission has been verified, you will no longer be required to comply with the Rapid Testing Program.

**REVIEW OF THE RAPID TESTING PROGRAM**

This Program is subject to continuous review as circumstances warrant. The City reserves the right to revise or end the rapid testing program at any time.

**FREQUENTLY ASKED QUESTIONS**

A comprehensive FAQ has been prepared to answer common questions.