

KINGSTON HEALTH SCIENCES CENTRE

CORPORATE POLICY MANUAL

Subject: Communicable Disease Screening for Staff and Affiliates

Number: 02-210

Issued by: President and Chief Executive Officer

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Introduction

In accordance with the [Public Hospital Act R.R.O. 1990, Regulation 965](#), all Ontario hospitals are required to implement a communicable disease surveillance program for all persons engaged in activities within such settings. At KHSC, maintaining robust immunity and testing protocols is a key strategy to minimize the risk of communicable disease transmission among patients and those individuals who work, learn, and volunteer at KHSC.

Policy

Communicable disease screening requirements are a condition of employment, credentialing, volunteering, and placement for all KHSC employees (see exception below), credentialed personnel, volunteers, learners patient advisors, and contracted personnel working on site and contributing to the day-to-day functioning of the organization under contract/purchased service agreement (e.g. Paladin, Compass).

Exception- KHSC employees who reside and work remotely outside of Ontario, and who are not expected to attend a KHSC facility, will be exempt from communicable disease screening requirements

For all other KHSC affiliates/outside workers not referenced above (e.g., vendors, construction contractors, agency personnel, etc.) who attend or work on-site at a KHSC facility, a risk-based approach is applied to determine when communicable disease screening is required:

Screening is REQUIRED for affiliates/outside workers where the individual:

- Works/attends patient care areas (e.g. clinical units, operating room); OR
- Has regular contact with patients; OR
- Will be consistently *working* on site in a non-patient care area, either:
 - for a period of more than 30 consecutive days, OR
 - on a regular, recurring basis (e.g. weekly)

where *working* excludes individuals who are on-site briefly and intermittently, such as delivery personnel or couriers who drop off or pick up items without entering patient care areas or having regular contact with staff or patients.

Screening is NOT REQUIRED for affiliates/outside workers such as construction personnel, where:

- They are performing work in a space that is physically isolated from patients and staff by barriers (e.g., “boarded-off” areas, such as enclosed construction zones separated by temporary walls), AND
- The isolated the space does not require entry or exit through a patient care environment.

Communicable disease screening is undertaken with respect to the following diseases: Measles, Mumps, Rubella, Varicella (Chicken Pox), Pertussis, Tuberculosis and, for some individuals, Polio and Hepatitis B. Additional communicable disease requirements may apply

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where warranted (e.g. pandemic).

KHSC offers additional vaccinations to employees who may be at risk of exposure to certain infectious agents during the course of their work. These may include, but are not limited to, vaccines for Hepatitis B and Meningococcal disease, depending on the nature of the role and associated risks.

COVID-19 and Influenza vaccines are offered to KHSC employees, appointed and credentialed personnel, volunteers, learners and regular contracted members of the workforce working on site in alignment with the following organizational policies: [COVID-19 Staff & Affiliate Vaccination Policy #02-199](#), and [Influenza Management- Staff Vaccination & Outbreak Management Policy #12-754](#).

Proof of vaccination/immunity must be submitted, using the appropriate Communicable Disease Screening form (see **Appendices A through F**), prior to the start of any role or activity at KHSC. Submission process is as follows:

Worker Category	Submission Location
New Employees	Occupational Health Dept.
New Medical Residents	Occupational Health Dept.
New Volunteers	Volunteer Services
New Learners	Educational Institution
New Patient Advisors	PFCC Lead's Office
Credentialed and Appointed Personnel (e.g. physicians, dentists, midwives, extended class nurses, departmental and research assistants, clinical observers)	Medical Affairs
Contracted Personnel	See #27 in this policy
Vendors	Intellicentrics Vendor software

Vaccine Exemptions:

KHSC does not accommodate vaccine exemptions based on personal preference. Vaccine exemptions will only be considered where there is an approved medically-based exemption or an approved protected ground-based exemption under the Ontario Human Rights code:

Medical Exemption

- If a required vaccine is medically contraindicated, the individual must submit documentation from their treating physician or a registered nurse in the extended class. This documentation must clearly state:
 - The medical reason for the contraindication,
 - Whether the exemption is permanent or time limited.
- For employees, documentation must be submitted to Occupational Health, Safety & Wellness (OHSW). OHSW will collaborate with the individual's manager to assess whether accommodation is feasible.

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- For others, documentation must be submitted to the appropriate individual/party (see procedures below).
 - As a healthcare organization, KHSC must consider the potential risk to patients posed by individuals who are not immune to one or more communicable diseases when determining accommodation options

Exemption Based on a Protected Ground under the Ontario Human Rights Code

- Individuals who believe they are exempt from vaccination due to a protected ground under the Ontario Human Rights Code must submit a formal request with supporting documentation. Requests based on personal beliefs or philosophical objections that do not meet the definition of a protected ground under the Code will not be accepted
- Employees and volunteers must submit their request to the Vice President and CHRO. Physicians and credentialed staff must submit to the Vice President, Medical & Academic Affairs.
- KHSC will assess each request in accordance with its duty to accommodate, while also considering the potential impact on patient safety and organizational operations.

Scope and Accountabilities

- A. This policy applies to individuals engaged in activities at KHSC (excluding patients and their family/visitors), including:
 - 1. KHSC employees, including medical residents/trainees
 - 2. Appointed and credentialed personnel,
 - 3. Volunteers, including Patient Advisors
 - 4. Learners
 - 5. Contracted personnel who work on site under contract/purchased service agreement and contribute to the day-to-day functioning of the organization (e.g. Paladin, Compass).
 - 6. Other affiliates/outside workers who attend or work on site at KHSC (e.g. vendors, construction personnel, consultants, staffing agency personnel), subject to the exceptions outlined above in the policy section.
- B. KHSC's Occupational Health, Safety & Wellness (OHSW) department is responsible for:
 - 1. monitoring and identifying changes needed in the communicable disease protocols,
 - 2. revising KHSC documentation and screening forms accordingly,
 - 3. communicating changes to parties across the organization to ensure processes, forms, and contractual language reflect the most current standards and evidence.

Definitions

Affiliate: An individual who is not employed by KHSC but performs specific tasks at KHSC, including contractors or employees of contractors who may be members of a third-party contract or under direct contract to KHSC, and individuals working on KHSC premises, but

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funded/employed through an external source.

Credentialed and Appointed Personnel: Medical (Physicians), dental, midwifery, extended class nursing, and appointed personnel such as departmental and research assistants, whose access to KHSC is granted through Medical and Academic Affairs.

Employee: A person directly hired by KHSC, on an ongoing or temporary basis and on a full-time, part-time or casual basis who are on the payroll of KHSC; includes medical residents (unless expressly excluded from the applicable policy).

Learners: An individual associated with an Academic Institution performing a placement or training towards achieving credit or certification.

Protected Grounds: personal characteristics that are legally protected from discrimination under the Ontario Human Rights Code, such as race, age, sex, disability, religion, etc.

Volunteer: An approved individual who donates their time and expertise to perform in a designated uncompensated position on KHSC's Board of Directors or through KHSC's Volunteer Services or Auxiliary organization.

Procedures

1. KHSC Employees (Permanent and Temporary)

- 1.1. As part of the recruitment process, new employees are provided with the *Pre-Placement Communicable Disease Screening* form (see *Appendix A*) which is used to confirm that the new employee meets KHSC's communicable disease screening requirements.
- 1.2. The new employee is required to have the form completed by their health practitioner, occupational health service at a previous hospital placement, or by their school. This form, or similar document providing documented evidence of immunity, must be provided to KHSC OHSW at the time of the new employee's scheduled pre-placement health appointment.
- 1.3. Where the new employee has made every effort to obtain the required screening and/or documentation in advance of their pre-placement appointment but has been unable to complete all screening/testing/vaccinations, the KHSC OHSW department will conduct the required tests, serology, and/or provide required vaccinations. The new employee will be informed in advance of any costs associated with testing and/or vaccinations administered by OHSW.
- 1.4. KHSC reserves the right to rescind an individual's offer of employment or appointment should that individual fail to comply with this policy.
- 1.5. In addition to the initial immunity requirements that apply to all staff, additional provisions apply to certain staff, depending on their work area, nature of their work, and risk of exposure. KHSC OHSW will be responsible for administering the following additional vaccinations, where indicated and outstanding, and will assume the costs of these vaccines.

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1.5.1. Hepatitis B vaccination - for workers at increased risk of occupational exposure to a blood borne pathogen who are not already vaccinated or immune. In addition to those who have direct contact with patients and/or gross contact with blood, workers at risk of needlestick injuries (e.g., housekeeping, central processing) will also be offered vaccination.

1.5.2. Meningococcal vaccination - for workers who are routinely exposed to preparations or cultures of *Neisseria meningitidis* (i.e., some microbiology MLTS). Vaccination will be provided at the time of the initial pre-placement and every 5 years thereafter if exposure is on-going.

1.6 For new employees who do not provide the required evidence of immunity/testing from their health care practitioner, and do not present/return to KHSC OHSW to complete the required testing or vaccinations, a reminder notice requesting they comply will be sent to the employee by OHSW. Continued failure to comply will result in notification to People Services and to the employee's manager. Continued non-compliance could result in disciplinary action up to and including termination.

1.7. In addition to baseline and post-exposure TB testing, KHSC will conduct an annual review of local TB epidemiology, including the number of TB admissions and community disease trends. This review will inform the facility's risk level and determine whether targeted periodic TB surveillance testing is warranted for specific staff or specific clinical units based on their exposure risk.

1.8. For employees who do not meet the required communicable disease screening requirements, a reminder will be issued by OHSW. Continued failure to comply with the protocol(s) will result in notification to the employee's manager, and then to People Services. Continued non-compliance could result in disciplinary action up to and including termination.

2. Medical Residents/Trainees

2.1. As part of the annual Resident intake, each new resident receives the *Communicable Disease Screening Requirements* form (**see Appendix F**), in advance of their start date. This form must be completed by the Resident's own physician/health care practitioner in order to confirm they meet KHSC's communicable disease screening requirements.

2.2. Where a Resident does not provide the required documentation or does not complete outstanding testing/vaccination with their own health care practitioner or through KHSC OHSW, OHSW will notify the Vice President, Medical & Academic Affairs for their follow up.

2.3. Additional requirements may apply to Medical Residents undertaking placement at other hospital(s) where the placement hospital has more stringent requirements in place.

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2.4. A Medical Resident who does not comply with the requirements will not be permitted to complete their KHSC residency and will not be granted privileges.

3. Credentialed and Appointed Personnel

- 3.1. As part of the credentialing/appointment process, KHSC credentialed (e.g. physicians) and appointed (e.g. departmental and research assistants) personnel will receive the *Communicable Disease Screening Requirements Form* (**see Appendix B**) from Medical and Academic Affairs. This form must be completed by their own physician/health care practitioner in order to confirm they meet the communicable disease screening requirements/KHSC Policy.
- 3.2. Failure to provide confirmation of immunity to Medical and Academic Affairs will result in hospital privileges not being granted/approved and could lead to being suspended or revoked.
- 3.3. Where the documentation of immunity is unclear, Medical and Academic Affairs may follow up with KHSC's OHSW department to seek clarification of whether all requirements have been met.

4. Learners

- 4.1. Learners undertaking placement at KHSC are required to meet KHSC's communicable disease screening requirements and this will be outlined in the Memorandum of Agreement between KHSC and the educational institution.
- 4.2. Where screening protocols are revised to include new or different immunity requirements, OHSW will inform the KHSC Student Coordinator in Medical & Academic Affairs who will subsequently inform the schools of the changes.
- 4.3. Prior to initiation of a learner placement, the school must confirm with the Student Coordinator in Medical & Academic Affairs that the learner meets the required immunity requirements (**see Appendix C**).
- 4.4. For schools that do not provide the required confirmation, they will be informed that the placement is at risk.
- 4.5. Other than the seasonal influenza vaccine and COVID-19 vaccine, the KHSC OHSW department does not provide immunity screening, testing or vaccinations to learners.

5. Volunteers

- 5.1. KHSC Volunteers will receive the *Communicable Disease Screening Form* (**see Appendix D**) in advance of their start date. This form must be completed by the Volunteer's own physician/health care practitioner to confirm they meet KHSC's communicable disease screening requirements.
- 5.2. Where the documentation of immunity is unclear, Volunteer Services may follow up with KHSC's OHSW department to seek clarification on whether all requirements have been met.
- 5.3. Patient Advisors are to provide proof of vaccination to the PFCC Lead's Office.

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- 5.4. Other than the seasonal influenza vaccine and COVID-19 vaccination, the KHSC OHSW department does not routinely provide immunity screening, testing or vaccinations to volunteers.
6. KHSC Affiliates (e.g. Consultants, construction and other contractors, agency personnel)
- 6.1. Pre-Contract/Onboarding Assessment- Before initiating any contract, purchased service agreement (PSA), employment arrangement, or on-site work, the KHSC host/contact person/Most Responsible Person (MRP) must determine whether the individual(s) meets the criteria for communicable disease screening as outlined in this policy.
- 6.1.1. If the communicable disease screening criteria **do not apply**, screening requirements do not need to be included in the contract/PSA or onboarding process.
- 6.1.2. If the communicable disease screening criteria **do apply** the following must be undertaken:
- 6.1.2.1. For individuals directly engaged by KHSC (e.g., independent consultant) KHSC must include communicable disease screening requirements and **Appendix E** in the contract or onboarding documentation. The KHSC host/contact person/MRP must confirm that screening requirements have been met before the individual begins work or receives a KHSC ID badge.
- 6.1.2.2. For individuals provided by an external organization (e.g., contracted service provider, staffing agency) KHSC must incorporate the communicable disease screening requirements, as identified in **Appendix E**, into the contract/PSA. The external organization is responsible for having a process in place to ensure that their personnel meet the screening requirements prior to the individual(s) commencing work.
- 6.2. KHSC reserves the right to request and verify proof of immunity or vaccination from any affiliate.
- 6.3. Exceptions will be made for EMS, Firefighters, and Police Officers, and contractors/service providers responding to the site to address an urgent need (e.g., flood, critical equipment repair, etc.)
7. Vendors
- 7.1. All vendors, including consultants supporting pharmaceutical and hospitality services, are required to register with Intellicentrics to create a vendor profile as part of KHSC's credentialing process.
- 7.2. Vendors who attend patient care areas (e.g., clinical units, operating rooms), or have regular, recurring presence on site in non-clinical areas, must meet KHSC's communicable disease screening protocols as outlined in Appendix E.
- 7.3. Through Intellicentrics credentialing system, vendors must confirm compliance with communicable disease screening requirements.

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- 7.4. Vendors are informed of KHSC's credentialing requirements through Intellicentrics during the initial contract procurement process, and any updates to product or service agreements.
- 7.5. Mohawk Medbuy is responsible for ensuring that all vendor contracts and agreements include language outlining KHSC's credentialing requirements, in accordance with the KHSC [Vendor Monitoring System Policy #02-012](#).

Related Documents

Appendix A – Pre-Placement Communicable Disease Screening - New Employees
Appendix B – Communicable Disease Requirements for Credentialed and Appointed Staff
Appendix C – Communicable Disease Screening Requirements for Students/Learners on Placement
Appendix D – Communicable Disease Screening for Volunteers – Proof of Immunity
Appendix E – Communicable Disease Screening Requirements for Affiliates/Outside Workers
Appendix F – Communicable Disease Screening Requirements for Residents
KHSC Corporate Policy # 02-012 [Vendor Monitoring System](#)
KHSC Corporate Policy #02-195 [Contractor Health and Safety](#)
KHSC Corporate Policy #02-199 [COVID-19 Staff and Affiliate Vaccination](#)
KHSC Corporate Policy #12-754 [Influenza Management- Staff Vaccination and Outbreak Management](#).

References

Ontario Hospital Association and the Ontario Medical Association (2023). [Communicable Disease Surveillance Guide](#)

Public Health Agency of Canada (March 24, 2022) Canadian Tuberculosis Standards, 8th edition. <https://www.canada.ca/en/public-health/services/diseases/tuberculosis/canadian-tuberculosis-standards-8th-edition.htm>

Public Hospital Act. R.R.O. 1990, [Reg. 965: HOSPITAL MANAGEMENT under Public Hospitals Act](#)

Authorizing Signature



Dr. David Pichora
President and CEO

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