

September 25, 2020

Exemption – Order 10-2020 – Order 32-2020 – Single Site Exemption for Specified Professions and Roles

Whereas the Chief Medical Officer of Health (CMOH) initiated an investigation into the existence of COVID-19 within the Province of Alberta.

Whereas the investigation has confirmed that COVID-19 is present in Alberta.

Whereas under section 29(2)(b)(i) of the *Public Health Act*, the CMOH may make an order pursuant to her authority under s. 29(2.1) of the *Public Health Act*.

Further to the above, the CMOH, pursuant to her authority under s. 29(2.1) of the *Public Health Act*, made Record of Decision – CMOH Order 10-2020 on April 10, 2020, amended through CMOH Order 32-2020, which came into effect September 17, 2020, (the Order), to suppress COVID-19 in those who may have already been infected with COVID-19; protect those who have not already been exposed to COVID-19; break the chain of transmission and prevent the spread of COVID-19; and remove the source of infection.

Pursuant to Part 1 - Section 1 of the Order, the operators and any contractors operating within a health care facility must restrict the movement of staff members among health care facilities by ensuring that each staff member works in only one health care facility¹.

Pursuant to Part 1 - Section 8, the CMOH may exempt in writing an operator, contractor, or staff member of a health care facility from the application of Part 1 of the Order on a case-by case basis.

The Office of the CMOH has received the following recommendations from Alberta Health in consultation with industry stakeholders relating to staff members working at more than one health care facility:

- 1) To the greatest extent possible, sites must have all staff work at one single DSL or LTC site. Sites are expected to share and adopt best practices and strive towards a single site workforce. Best practices have also been refined during COVID-19 outbreaks and sites are expected to implement these.

¹ For the purposes of Order 10, Part 1, health care facility is defined as an auxiliary hospital under the Hospitals Act, a nursing home under the Nursing Homes Act, and designated supportive living accommodation under the Supportive Living Accommodation Licensing Act.

- 2) There are certain essential service workers at these facilities that by the nature of their responsibilities have part-time or intermittent responsibilities at multiple sites. This sub-group of essential service workers has been determined by the nature of their work to have the ability to work at more than one site, and through the course of the pandemic, this classification of the workforce has had extra precautions put in place when performing their services. Regardless of where the person is employed these persons are encouraged to provide virtual services where possible and appropriate. Should it be necessary to attend the facility, they should limit the number of different facilities they enter and provide in-person care to only one facility per day, to the greatest extent possible.
- 3) The essential service workers that are described in (2) above include:
 - Physicians;
 - Nurse practitioners;
 - Allied health professionals²;
 - Home care;
 - Specialty consultants (including Resident Assessment Instrument (RAI) coordinators);
 - Dialysis staff;
 - Educators;
 - Pharmacy;
 - Laboratory staff;
 - Public health;
 - Infection prevention and control staff;
 - Authorized inspectors, officers and investigators for care, compliance or safety;
 - Medical Assistance in Dying coordination;
 - Pastoral Care;
 - Information Technology support staff;
 - Specialty maintenance staff; and
 - Operational leaders (including corporate/regional/zone level).
- 4) All others not on this list will require a case by case exemption from the Chief Medical Officer of Health. This includes but is not limited to: frontline staff; extenuating circumstances in outbreak; non-clinical supports like facility maintenance or laundry services.
- 5) Facility operators must track employees who fall into this exemption and provide it to Alberta Health upon request.
 - a. Tracking should include number of employees and number of sites each employee accesses across a period of time.

² Allied health professionals are health care practitioners with formal education and clinical training who are credentialed through certification, registration and/or licensure.

Therefore, pursuant to Section 8 of the Order, I am satisfied that in specific and approved circumstances, the class of workers and professionals identified above may be exempt from Part 1 – Section 1 of the Order, subject to the following conditions:

- I. Subject to paragraphs II, III, and IV, staff members in the job classifications and professions listed below may work at more than one site:
 - Physicians;
 - Nurse practitioners;
 - Allied health professionals;
 - Home care;
 - Specialty consultants (including Resident Assessment Instrument (RAI) coordinators);
 - Dialysis staff;
 - Educators;
 - Pharmacy;
 - Laboratory staff;
 - Public health;
 - Infection prevention and control staff;
 - Authorized inspectors, officers and investigators for care, compliance or safety;
 - Medical Assistance in Dying coordination;
 - Religious leaders;
 - Information Technology support staff;
 - Specialty maintenance staff; and
 - Operational leaders (including corporate/regional/zone level).
- II. The individuals identified in paragraph I must be designated by their employer and are permitted to work at more than one facility as long as best practices are in place to limit the transmission of COVID-19.
- III. The individuals identified in paragraph I and facility operations are to the greatest extent possible to limit the identified individuals to work at only one health care facility per day.
- IV. The individuals identified in paragraph I shall comply with AHS's "Guidance for Staff Working at Multiple Sites Continuing Care", as may be updated from time to time.

Although the individuals identified in paragraph 1 are exempt from Part 1 of the Order, all persons providing or responsible for services to the Albertans in these health care facilities must promote appropriate hygiene, distancing of 2 metres from other people where possible, and other measures identified by public health authorities to protect these persons and Albertans from further transmission of COVID-19.

The exemption provided by this letter may be terminated or modified by the CMOH in writing without notice at any time and for any reason as determined by the CMOH.

This exemption comes into effect on September 25, 2020.

We trust this is satisfactory.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Deena', followed by a stylized, cursive flourish.

Deena Hinshaw, BSc, MD, MPH, CCFP, FRCP
Chief Medical Officer of Health