



**Public Service Commission
PO Box 2703, Whitehorse, Yukon Y1A 2C6**

November 16, 2021

Yukon Employees' Union
Attn: Steve Geick, President
201-2285 2nd Ave.
Whitehorse, Yukon Y1A 1C9

Yukon Teachers' Association
Attn: Ted Hupé
2064 – 2nd Ave.
Whitehorse, Yukon Y1A 1A9

RE: Response to request for analysis re testing as a substitute to vaccination

Dear Ted and Steve

In follow up to our letter dated November 10, 2021 regarding the the COVID-19 Vaccine Mandate, the YTA requested the a/Chief Medical Officer of Health's (a/CMOH) analysis regarding testing and why it is not recommended as an alternate to vaccinations. This analysis is shared below as per your request.

Please let us know if we can provide any further information or clarification. Again, we appreciate the general support of mandatory vaccines both the YTA and YEU have made clear publicly and to your members.

Paul Moore
Public Service Commissioner

Analysis:

Testing has been proposed as an accommodation for workers who refuse to get vaccinated despite vaccine mandates.

- Testing is insufficient to support the policy goals.
 - It will not increase vaccine rates. On the contrary it is likely to decrease vaccine rates.
 - It has limited ability to protect those at risk from transmission.
 - It shifts the burden from the individual to the public health system. To implement testing as an alternative requires setting up a program and defining protocols to meet what would be a significant increase in testing demands.
- The Yukon health care workforce is fully occupied and will not be available to support these programs.
- Furthermore, vaccination is the better option from a public health perspective.
 - Vaccination reduces the risk of contracting and spreading the virus.
 - Vaccination reduces the number of clusters, outbreaks and overall case counts; it also reduces the severity of disease overall; this in turn reduces the burden on both the public and acute care health systems. This allows the health system to provide care for patients whose care has been deferred or affected by the pandemic.
- Testing is a point in time assessment of viral load. Point-of-care testing is not accurate during early and late disease when viral load is low. This leads to a false negative test result for a person who has been infected. A false negative increases the risk of transmission as the individual is then permitted to enter the workplace. Conversely, there can also be a false positive result in testing. A false positive would disrupt a person's work as they would have to self-isolate, leading to a potential loss in productivity and impact on people they live with, as well as shift the burden on to the public health system.
- When using self-tests there is a risk of contamination from improperly managed used swabs.
- Public health may be compromised if testing resources are diverted from symptomatic and close contact testing to allow for routine testing of unvaccinated individuals.
- The public health benefit and accuracy of tests in self-administered home programs has not been established. Although emerging evidence out of the UK suggests sensitivity of some antigen tests is significantly lower when undertaken by non-experts, and without clear programming protocols widespread testing can be wasteful.

Other Jurisdictions

- BC is using testing as a short-term, preventative measure in health care for those
 - who are not yet fully vaccinated; or
 - who are awaiting a reply on their request for medical deferral.These healthcare workers must be tested for COVID-19 by means of a rapid test at a facility at every shift.
- BC Public Service Agency states “there are not legitimate grounds for an accommodation” and will not be using testing as an accommodation.
- ON announced on August 17th that it would be mandating vaccines for hospitals and community care and extending the mandate to many other higher-risk settings. The announcement stated that regular antigen testing would be required as an alternative if proof of full vaccination was not provided. The vaccination policy was to be effective no later than September 7, 2021. Although these dates have past, the testing as an accommodation has not been implemented, therefore the success of implementing testing as an alternative is unknown. Furthermore, other reports around school screening programs suggest the supply is not meeting the demand for testing.
- NWT is requiring that those who are unvaccinated to undergo regular testing (up to 3 times per week) and wear PPE in the workplace. Government of NWT is planning to procure rapid tests for employees to self-administer if they are unvaccinated. NWT has an existing program “Detect NWT” for businesses and organisations to allow for rapid tests for their employees.

Recommendations:

The a/CMOH does NOT recommend testing as a substitute for vaccination.

Medical deferral to a limited group of individuals where vaccine is not currently indicated should be accommodated. This will be a very small number of people that can be accommodated by doing regular symptom screening in their place of work.

Accommodations for religious exemptions are not recommended for communicable disease control although it is recognised that some may be necessary to comply with territorial and/or national legislation on rights and freedoms.