



October 5, 2021

Children's Services
Social & Community Services
Department
Halton Region
690 Dorval Drive 5th Floor
Oakville ON L6K 3X9

RE: Updated COVID-19 information

Dear Service Provider,

I am writing to share information with you that we have received from Halton Region Public Health and information regarding the immunization disclosure policy and rapid antigen testing that has been forwarded to us through the Ministry of Education in response to questions they have received directly.

Halton Region Public Health Updates

As you are aware, Halton Region Public Health provides recommendations for child care operators in addition to guidance from the Ministry of Education to enhance health and safety measures based on local experience and data. Halton Region Public Health strongly recommends the following actions:

- Masking for children in kindergarten (i.e. JK and SK) while indoors and when taking child care transportation;
- Eye protection be worn in addition to a medical mask, when working in close contact with children who are not wearing masks both indoors and outdoors;
- Children remain in their designated cohort during outdoor activities/play and maintain a two metre distance from other cohorts and supervisors and/or designates;
- Staff and students on educational placements limit movement between child care locations and between licenced age groups (cohorts) and remain with the same cohort in the same space as much as possible; and
- No large gatherings indoors or outdoors.

These are recommendations at this time and are identified as important to minimize the impact on your centres in the instance of an outbreak. In the event of an outbreak, Halton Region Public Health may require the recommendations to be followed. Additionally, Health Inspectors who visit your sites may identify the recommendations as best practice but are following the Provincial Guidance mandates that were provided to you in August in reporting compliance.

Immunization Policy and Rapid Testing Information

As you are aware, the Ministry of Education introduced a vaccination disclosure policy for licensed child care settings, with rapid antigen testing requirements for staff who are not immunized against COVID-19. Halton Region has sought clarity from the Ministry of Education regarding the details of the immunization policy in licensed child care and school settings. Information has also been shared from the Ministry of Education through the [Resource guide for licensed child care: COVID immunization disclosure policy](#).

Regional Municipality of Halton

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The Ministry has shared question and answers, all found below, on the following topics:

- Immunization Disclosure Policy – p. 3
- Rapid Antigen Testing – p. 4
 - Home Child Care – p. 8
 - EarlyON – p. 8
 - Before and After School Care – p. 10

As a reminder if you have any general inquiries regarding COVID-19 Guidance please utilize the childcareservices@halton.ca email and Children's Services staff will work with Halton Region Public Health to provide you the information you need.

Similar to last year, we request that principals and child care centre/camp operators use the hyperlink provided below to report any positive cases of COVID-19 in students/children to Halton Region Public Health. If you do not have online access, you may call 311 for assistance with submitting an online report.

Reporting tool: <http://halton.ca/Positive-COVID-Result-Reporting-for-School-Child-Care>

In addition, Staff working in schools or child care centres/camps are asked to use the link provided below to report themselves if they are deemed a COVID-19 case by their local Public Health Unit. This information will facilitate prompt identification of the school or child care settings where the staff member works, enabling the efficient dismissal of any impacted cohorts. Staff will continue to receive follow-up from their local Public Health Unit. If staff have challenges with the form, they may call 311 for assistance.

Reporting tool: <http://halton.ca/Positive-COVID-Result-Reporting-for-School-Child-Care>

Thank you for your continued dedication to keeping children, families and our community safe.

Sincerely,



Sandy Palinski
Director, Children's Services

Att.

Questions & Answers

Immunization Disclosure Policy

Q. As child care is not captured under the provincial vaccine certificate policy, can a child care's COVID-19 policy indicate that all individuals who enter the child care premises must be fully vaccinated? Can a child care program deny entry to people if they do not meet the requirements of the policy?

A. As private businesses, licensed child care programs are permitted to put policies in place that go above and beyond the requirements set out in the CCEYA and its regulations; however, licensees must ensure that these policies and protocols do not conflict with their obligations under the CCEYA and other legislation, including parents of children receiving child care cannot be denied access to their child or to the child care premises based on their vaccine status.

Where feasible, licensees are encouraged to continue to offer drop off and pick up procedures where parents do not enter the building. This supports physical distancing and limits the number of in-person interactions necessary when children are dropped off or picked up. Licensees must ensure all requirements for individuals accessing the premises are met, including screening for symptoms of COVID-19, maintaining attendance records that include time in and time out, maintaining appropriate physical distancing and ensuring appropriate personal protective equipment is worn.

Q. When a child care centre is co-located with a public school, are the staff/volunteers and other individuals associated with the child care centre captured under the school board's immunization disclosure policy or the licensed child care immunization disclosure policy?

A. Licensed child care centres located in schools are NOT to be captured as part of a school board's immunization disclosure policy as licensed child care programs are required to have their own policy in place. School boards/schools and child care centres are encouraged to communicate at the local level and ensure both parties are aware of their respective obligations.

School boards may include authorized recreation providers or other recreation programs operating out of the school consistent with the school board's immunization policy and direction from the Chief Medical Officer of Health.

Q. If a school board directly operates child care and employs child care staff, should the Board be including these within their school policy or is the child care to have its own policy?

A. Where a school board directly operates a child care and employs child care staff, the school board may have one policy for all their employees, including child care, provided that the policy meets all requirements for both schools and child care.

However, reporting aggregate data on vaccine status should be provided separately for child care. If there is an individual who works in both programs, please only count them once, where it is most logical to do so. For child care licensees, the deadline for the first data submission is September 15, 2021.

Q. When a special needs resource consultant, employed by a third party agency provides services at a child care program, is the licensee able to accept an attestation from the employer which indicates that the individual is fully vaccinated, medically exempt or has completed the education session?

A. Yes, licensees are able to accept an attestation from the special needs resource consultant's employer. Licensees will be required to keep a copy of the attestation on file for record keeping purposes.

Where the special needs resource consultant is not fully vaccinated, the licensee will need to comply with the rapid antigen testing requirements as set out in the licensee's vaccination disclosure policy.

Q. For private operators of school and licensed child care at the same location, do they need to have two separate policies?

A. Private schools that also operate licensed child care may choose to include both programs under the same policy, provided the policy meets all requirements for both private schools and licensed child care; however, statistical data must be reported separately for staff associated with the child care and staff associated with the private school. If there is an individual who works in both programs, please only count them once, where it is most logical to do so.

Rapid Antigen Test

Q: Is at-home unsupervised testing acceptable?

A: Licensees must set out a process to implement their immunization vaccine disclosure policies including self-administration of testing of those subject to testing requirements and confirmation of negative results.

Q. Who should be contacted if the school boards or other test distributors run out of rapid tests?

A: Those organizations that received Direct Delivery will be able to order more kits using the online Ontario Together portal at a future date. In the meantime, please contact the licensed helpdesk to order additional kits.

For those licensees who received kits through the Chamber of Commerce, please order additional kits through your local chamber of commerce.

For those licensees who received kits through a local school, please work with the school to order additional kits.

Q. When going online to order the test kits from the Chamber of Commerce it states, "Each company should assign a Screening Supervisor Designate, who will be the contact person. This person is responsible for administrating the test and must be the one who picks up the kits."

Does a staff member need to be trained and overseeing this process or can staff complete the tests independently either at home before they arrive at the centre and/or when they arrive at the centre prior to interacting with children and other staff members?

Anyone who is “trained” can perform a test. Rapid antigen tests can be performed by health professionals or any individual who is trained (including self-swabbing). Any individual is considered trained when they have consulted the appropriate training materials. A trained individual may complete tests independently either at home before they arrive at the centre and/or when they arrive at the centre prior to interacting with child and other staff.

Q. How often do individuals who are not vaccinated need to provide a negative test result?

A. As per the memo dated September 4, 2021 from Phil Graham, Assistant Deputy Minister of the Early Years and Child Care Division, child care programs must require that individuals who are not fully vaccinated submit to regular rapid antigen testing. Individuals subject to testing requirements must provide verification of negative test results two times per week as an added measure to protect child care settings from the risk of COVID-19.

Q: How will tests be available in rural areas?

A: Child care licensees will be able to log onto CCLS, navigate to the License Detail page to see which delivery approach they fall under. Rapid Antigen Tests will be provided at no cost to licensees through direct delivery, Ontario Chamber of Commerce Rapid Screen Initiative or School Board/School Delivery. Details can be found in the memo dated September 4, 2021 from Phil Graham, Assistant Deputy Minister of the Early Years and Child Care Division

At this time, there is no ability to change the delivery approach assigned to each licensee.

Q: Do school boards who distribute rapid testing kits to child care programs have to report their reporting data to the ministry?

A: No. Licensees will be required to report monthly data submissions to the Ministry of Education using an online form. An offline reporting template will be made available for larger multi-site organizations (more than 25 licensed centres).

Q: How should waste generated from rapid antigen tests be disposed of?

A: Waste generated from rapid antigen screening tests is considered a hazardous waste under the *Environmental Protection Act*. The Ontario government recently made amendments to the regulation governing hazardous waste management to exempt waste from these tests from collecting, storage and transportation requirements as long as the waste is disposed in Ontario. This waste must still be disposed of at a waste facility approved to handle biomedical waste. In addition, those collecting, storing or transporting these kits should follow Ontario’s guidance on the [Safe Handling and Management of Rapid Antigen COVID-19 Testing Waste](#).

For waste generated from at-home rapid antigen screening, the regulatory requirements for managing the hazardous waste under the *Environmental Protection Act* do not apply.

Instead, persons undertaking at-home rapid antigen tests should consult their local municipality's by-laws on the proper disposal of this waste to ensure it can be disposed of with the household trash.

The ministry will be sharing a communication shortly with additional information regarding antigen testing. This communication will include a resource from Ontario Health about discarding these tests.

Q: Are licensees able to provide free rapid antigen testing kits to visitors, students, and parents, as well as staff?

A: Rapid antigen point-of-care tests provided to licensed child care programs are intended for individuals that are covered by the licensee's immunization disclosure policy. These tests are not intended to be used to screen children. Licensees are expected to maintain their current screening protocols for children and are encouraged to use the provincial COVID-19 school and child care screening tool.

Q: Is there a specific time in the day that rapid antigen testing must be done?

A: Further to the Letter of Instruction issued by the Office of the Chief Medical Officer of Health, licensed child care programs must require that individuals who are not fully vaccinated submit to regular rapid antigen testing. Individuals subject to these testing requirements must provide verification of negative test results two times per week. To support this process, the Ministry asks that licensees inform those required to undertake testing of the following instructions:

- Testing is to take place at an individual's residence prior to attending work.
- Testing should be implemented consistently on a weekly basis with at least 3 days between tests, and conducted Sunday to Friday.
- Testing should not take place more than 48 hours before attending work.

Q: Can mouth swabs be used for COVID-19 rapid tests in place of the Rapid Antigen Tests that are being supplied?

A: Rapid antigen screening must be conducted in accordance with [COVID-19 Guidance: Considerations for Antigen Point-of-Care Testing](#). Please note, rapid antigen screening is only for individuals who are asymptomatic. Anyone who has symptoms should seek testing at their local assessment centre consistent with provincial testing guidance. This is mandatory for all licensed child care, with the exception of those programs operating on-reserve, for which this is an optional approach.

Q: Do child care centres need to report to Chambers of Commerce as well as to EDU?

A: No, licensees will be required to report monthly data submissions to the Ministry of Education using an online form. For larger multi-site organizations (more than 25 licensed centres), an offline reporting template will be made available.

Q. In the memo shared on September 14, 2021, it states "If an individual has had a laboratory-confirmed COVID-19 infection they should not participate in antigen testing for 90 days following the date of their positive COVID-19 test result. These individuals should immediately resume COVID-19 rapid antigen testing after the 90th day from the date of their

positive COVID-19 PCR result.” **What happens after the 14-day isolation/negative test and return to work of those staff that are unvaccinated if they are not to participate in antigen testing for 90 days?**

A: If an individual has had a laboratory-confirmed COVID-19 infection, they should not participate in antigen testing for 90 days following the date of their positive COVID-19 test result. However, they may return to work during this time – it is just not advised that they re-test for the duration of the 90-day period.

Individuals who have previously been diagnosed with and cleared of COVID-19 infection may resume asymptomatic screening testing after 90 days from their COVID-19 infection (based on the date of their positive result). If that individual were to require testing during that 90-day period, they should not be participating in an antigen test. Any individual who is currently symptomatic or has been in contact with a confirmed case of COVID-19 should be directed to obtain a diagnostic test instead of antigen point of care testing. Antigen point of care testing is appropriate for use in asymptomatic individuals only.

Q. Since the Thrive App is optional, but reporting is not optional, where should licensees be reporting the rapid antigen testing data?

A: Organizations who do not want to use the Thrive app will be required to report into a centralized database, the Health Data Collection Service.

Organizations will be onboarded on to the Health Data Collection Service and provided information and training on how to submit data and register data entry persons. Data must be entered weekly by Friday at 11:59pm EST - COVID-19 Health System Response Materials Ontario Health. The below has been pulled from the immunization disclosure policy testing requirements which was sent to licensees on September 14.

Licensees can use the Thrive app for verification and reporting purposes. The Provincial Antigen Screening Program requires that all organizations receiving free antigen screening tests submit weekly reporting to the Ministry of Health (MOH). Using the Thrive app allows organizations to fully meet this requirement and would not require any additional, regular reporting to MOH.

If organizations choose to use another tool for verification, they will be required to report weekly an aggregated data set to the provincial government. The following information will be required from participating organizations:

1. The type of rapid test used.
2. Number of rapid antigen tests used.
3. Number of invalid rapid antigen test results.
4. Number of individuals who tested positive with a rapid antigen test.
5. Number of individuals who tested negative with a rapid antigen test.

All data is reported and stored at the aggregate, de-identified level; no patient identifiable data is collected.

Home Child Care

Q: Are individuals (adults) who reside at a licensed home child care location but are not on premise during the times when children are in care, required to meet the rapid testing requirements if they are not fully vaccinated?

A: Individuals who are not fully vaccinated and subject to the mandatory immunization disclosure policy are required to complete regular testing (twice a week). At a minimum, the ministry expects that the following groups of individuals would be covered by the policy, except where the individual works remotely and the individual's work does not involve in-person interactions:

- Employees of the licensee (including home visitors);
- Home child care providers;
- Volunteers;
- Students on an educational placement;
- Any licensee who regularly interacts with children, staff or providers;
- Adults ordinarily a resident of or regularly present at a home child care premises; and,
- Any other person who provides child care or other services to a child who receives child care (e.g., special needs resourcing consultant)

Licensees may wish to seek independent legal advice with respect to their individual situation.

At this time, data reporting to the Ministry of Education only applies to staff members and home child care providers.

Licensees must ensure records required under the instruction are kept in a secure location at the child care center, home child care agency, or home child care premises and are made available for inspection by an inspector or program advisor at all times. Copies of these records may be kept in hard copy or digital form.

Q: Is there a timeline for completing the education session? When is the training video expected?

A: Licensees are responsible for identifying and approving the educational session required for individuals who do not intend to be vaccinated. The Ministry of Education will be making a resource available to licensees should they wish to use it for their educational session. The ministry will share the video resource with licensees shortly.

EarlyON centres

Q: Are EarlyON centres required to have a COVID-19 vaccination policy?

A: At this time, no instructions have been issued by the Office of the Chief Medical Officer of Health to persons responsible for the operation of EarlyON centres requiring a COVID-19 vaccination policy.

EarlyON centres must also follow any local vaccination policy requirements as set out by their local public health units.

Q: Do EarlyON centres located in schools or licensed child care have to be included in the vaccination policy?

A: The Office of the Chief Medical Officer of Health issued instructions for schools and licensed child care requiring the establishment, implementation, and compliance with a COVID-19 vaccination policy.

A licensed child care and school board's COVID-19 vaccination policy must apply to all staff, and other individuals who have frequent and direct contact with staff or students in schools, child care and/or during student transportation, including third-party contractors and visitors. Based on these parameters, school boards and child care centres will determine if a vaccination policy is applicable to third-party program staff.

EarlyON providers operating from a school site or attached to a licensed child care centre may be required to comply with the requirements that apply to school boards and child care licensees and therefore should work with the local school board or child care licensee to confirm any requirements that may apply.

EarlyON centres must also follow any local vaccination policy requirements as set out by their local public health units.

Q: If an EarlyON centre shares staff with a licensed child care centre, are the staff from the EarlyON centre required to follow the requirements of the licensed child care centre's COVID-19 vaccination policy?

A: Child care centre licensees are required to establish, implement and ensure compliance with a COVID-19 vaccination policy that requires all staff, which would include EarlyON staff also working in a licensed child care centre, to show:

- proof of full vaccination status against COVID-19 or,
- a medical exemption or proof of medical reason or,
- proof of completion of an education session on the benefits of vaccination.

Q: Will the upcoming rules relating to proof of vaccination apply to EarlyON providers?

A: EarlyON Centres are not listed as an organization or business requiring proof of vaccination/proof of identification.

EarlyON Centres with programs operating in indoor facilities such as meeting and event spaces and facilities used for supports and recreational fitness may be subject to proof of vaccination/proof of identification requirements for these facilities and are encouraged to consult with public health/the organizations managing the facilities to determine if the rules regarding proof of vaccination apply.

EarlyON centres must also follow any local vaccination policy requirements as set out by their local public health units.

Before and After School Programs

Q: What policies are EarlyON providers that offer Before and After School Programs subject to in relation to immunization disclosure/testing/reporting?

A: Licensed child care programs, including licensed before and after school programs, are required to establish, implement and comply with a COVID-19 vaccination policy that includes requirements relating to disclosure, testing and reporting.

Unlicensed before and after school programs, such as authorized recreational and skill building programs, are not required to have a COVID-19 vaccination policy. If the program is located in a school, they may be required to comply with a school board's COVID-19 vaccination policy.

In addition, all before and after school programs must follow any local requirements for vaccination policies as set out by their local public health units.

Q: Are authorized recreation providers who offer an after school program in a school required to have an immunization disclosure policy? These are not school board (or licensed child care) staff or programs, but rather third party organizations delivering programs in schools.

A: Authorized recreational and skill building programs are not required to have a COVID-19 vaccination policy.

A school board's COVID-19 vaccination policy must apply to all staff, and other individuals who have frequent and direct contact with school board staff or students in schools and/or during student transportation, including third-party contractors and visitors. Based on these parameters, school boards will determine if a vaccination policy is applicable to third-party program staff.

Providers of authorized recreational and skill building programs operating from a school site may be required to comply with the policies of the school. Providers should consult with the school/school board for further information regarding these requirements.

In addition, all authorized recreational and skill building programs must follow any local requirements for a COVID-19 vaccination policy as set out by their local public health units.