

**TO:** Child Care Licensees

**FROM:** Phil Graham  
Early Years and Child Care Division

**DATE:** September 14, 2021

**SUBJECT:** Immunization Disclosure Policy – Testing Requirements

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Thank you again for your continued commitment to supporting children, families, and educators in child care and early years programs. I am writing in follow-up to the memo you received on September 4, 2021 that provided initial details on the testing requirements of the immunization disclosure policy.

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.

Example Scenarios:

Test 1: Monday; Test 2: Thursday; Repeat,  
Test 1: Friday; Test 2: Tuesday; Repeat, or  
Test 1: Sunday; Test 2: Wednesday; Repeat.

This handout explains how an individual can self-administer a COVID-19 rapid test kit:

English:

<https://www.ontariohealth.ca/sites/ontariohealth/files/2021-08/PASP-COVID19-Self-Testing%20Instrucitons.docx>

French:

<https://www.ontariohealth.ca/sites/ontariohealth/files/2021-08/PASP-COVID19-Self-Testing%20Instructions-FR.docx>

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.

A positive result on a rapid antigen test is considered a preliminary (presumptive) positive and requires confirmation with a PCR test.

**Any individual that receives a preliminary positive result on a COVID-19 rapid antigen test, is required to:**

1. **Seek a confirmatory** PCR test immediately (ideally within 48 hours) at a designated testing centre.
2. **Isolate** immediately until the result of their confirmatory test is known.
3. **Safely return to work only after they receive a negative result on a confirmatory test at a designated testing centre.**

Any positive confirmatory test is routinely reported to the local public health unit, consistent with public health legislation, to support case and contact management and surveillance.

An employer has no obligation to inform a public health unit of an employee's rapid antigen test result (regardless of whether it was positive or negative).

**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 90<sup>th</sup> day from the date of their positive COVID-19 PCR result.

Individuals that are covered by the licensee's immunization disclosure policy, but are not directly employed by a licensee must provide their attestations or negative test results directly to the licensee, but are not required to duplicate testing if their employer also has a rapid antigen testing policy.

Alternatively, third-party employers/agencies could also provide the attestation of the employee or negative test results to a licensee.

Please note, 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.

### Accessing Tests

**Please note: Ordering rapid antigen tests through the [Ontario Together website](#) is no longer an option to obtain a supply of tests. Orders placed through the [Ontario Together website](#) will be automatically cancelled.**

A supply of rapid antigen tests will be provided at no cost to licensees and each licensed child care program has been assigned one of three methods of obtaining tests:

1. Direct Delivery
2. Pick-Up through the [Ontario Chamber of Commerce Rapid Screen Initiative](#)
3. Pick-Up at an Assigned School

To find your assigned method of obtaining tests, please log in to the [Child Care Licensing System \(CCLS\)](#) and navigate to the “Licence Details” page. There will be text at the top of the page, above your licence documents, indicating which method you have been assigned. For chamber of commerce and school pick-up methods, you will also be notified of the closest chamber of commerce or assigned school.

If you operate multiple programs, please ensure you check each licence as your programs may have been assigned different pick-up approaches. If you have been assigned direct delivery, each licence will indicate direct delivery; however, you will only receive one shipment with enough rapid antigen tests for all programs.

**For licensees ordering and picking-up tests through the [Ontario Chamber of Commerce Rapid Screen Initiative](#)**, please visit the Rapid Screen initiative website and find the link to your local chamber of commerce in the list of participating organizations. Register as soon as possible and complete the necessary steps to obtain your tests. You do not need to wait for further information or instructions from the Ministry of Education.

**For licensees receiving direct delivery of tests**, your shipment is expected to arrive by mid to late September. Please use the interim approach identified below until your tests arrive.

**For licensees picking up tests at a school**, schools are expected to receive their shipments by mid to late September, and you will receive additional information on arranging your pick-up in the coming weeks. Please use the interim approach identified below until you obtain a full supply of tests.

## Interim Approach

As noted in the September 4 sector memo, for licensees who do not currently have access to rapid antigen tests for their staff/providers, the government has authorized pharmacies to provide publicly funded COVID-19 rapid antigen testing services to those individuals subject to an immunization disclosure policy in licensed child care and schools (i.e., individuals who are not fully vaccinated). **This is a temporary measure that will only be in place from September 7 to September 21, 2021.** Individuals will be required to show valid ID and an eligibility letter from a licensee indicating they are subject to testing requirements.

For those areas of the province where pharmacy-based rapid antigen testing is not available, licensees must access testing kits through their local chamber of commerce. Please visit the [Rapid Screen Initiative](#) for more information if this applies to your organization.

Licensees who have already been assigned to pick-up tests through the [Ontario Chamber of Commerce Rapid Screen Initiative](#) are NOT eligible to use pharmacy based rapid antigen testing services and must obtain tests through their local chamber of commerce as soon as possible.

## Verification of Testing

As you are aware, work is underway on a digital solution for verifying testing results through the Thrive app, offered through the [Creative Destruction Lab Rapid Screening Consortium \(CDLRSC\)](#). CDL Rapid Screening Consortium is a not-for-profit initiative that provides guidance and support to organizations that are implementing a rapid screening program in Canada. More information can be found on CDL RSC's [website](#).

This app will be available free of charge and allows for individuals to submit photo evidence of their rapid antigen test results directly from home. Licensees will also be able to export records of verification for record keeping purposes.

Licensees should designate individuals responsible at the site/licensee level to verify information. Licensees should also designate participating staff to attend a kick-off meeting and sign up for the data collection app on behalf of the site/licensee. Licensees are encouraged to register as soon as possible to allow enough time for onboarding and set-up.

To get started, register your site [By Visiting This Site](#). You will receive a digital copy of CDL RSC's Participant Letter of Agreement for signature.

Once signed digitally, the CDL RSC team will provide you with a link to attend a Kick-Off Webinar, and guide you through next steps.

CDL RSC also supports organizations through weekly operational meetings, scaling guidance through an industry partner 'buddy' system, a quick start guide and resources, virtual helpdesk & communication tools, as well as technical support for screening data intake.

### Indemnification of Licensees for Use of the Thrive Health App

Ontario will agree to indemnify licensees to the extent that liability is incurred under the indemnity provisions<sup>1</sup> in the letters of agreement entered into by the licensee with CDL RSC and Thrive Health Inc.

Further information on how licensees may secure an indemnification from Ontario related to the use of the Thrive Health App will be provided. The Ministry will send further documentation Friday, September 17, 2021. In the meantime, if you have any questions related to the indemnification, please contact Licensed Child Care Helpdesk at [childcare\\_ontario@ontario.ca](mailto:childcare_ontario@ontario.ca).

To facilitate access to this optional tool, the Ministry of Education needs to determine which licensed child care programs are interested in using this app.

Please take 5 minutes to fill out the survey by Wednesday, September 15, 2021 at the following link and let us know whether your program would be interested or not.  
<https://forms.office.com/r/88Vuuu9hg6>

If you operate more than 10 licensed child care programs (child care centres or home child care agencies), you can choose to submit your information individually through the online link or using a template. You can request the template from the Licensed Child Care Helpdesk at [childcare\\_ontario@ontario.ca](mailto:childcare_ontario@ontario.ca).

### Reporting

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:

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<sup>1</sup> Section 5(f) of the Agreement with CDL RSC and section 7.3 of the Agreement with Thrive Health Inc.

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.

### Education Video

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.

Thank you for your cooperation.

Sincerely,

Phil Graham

c. Children Services Managers, Consolidated Municipal Service Managers and District Social Services Administration Boards