

**TO:** Child Care Licensees

**FROM:** Phil Graham, Assistant Deputy Minister  
Early Years and Child Care Division

**DATE:** September 4, 2021

**SUBJECT:** Mandatory Immunization Disclosure Policy – Rapid Antigen Testing Updates

---

Thank you for your ongoing efforts to prepare for the implementation of the mandatory immunization disclosure policy announced by the Chief Medical Officer of Health (CMOH) on August 17, 2021. The purpose of this memo is to outline planning to date on the rapid antigen testing component of this policy.

As you know, in accordance with the instructions issued by the CMOH, schools and 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 at least two times per week** as an added measure to protect child care settings from the risk of COVID-19.

Based on planning to date, and subject to further confirmation, the following provides an overview of the proposed testing approach for licensed child care settings, with additional details to come at a later date.

### **Access to Tests**

Tests will be provided at no cost to licensees in one of three ways:

#### 1. Direct Delivery

Approximately 60 of the largest child care organizations in Ontario will receive direct delivery of tests to the licensee's mailing address identified in the Child Care Licensing System. These organizations have been identified for direct delivery as they are not considered small/medium businesses and therefore not eligible for the other options detailed below.

Shipments will include enough tests for all sites associated with the organization and licensees are responsible for ensuring each site gets the required number of tests.

A separate distribution process will also be developed for licensees in remote areas, including First Nations communities.

## 2. Ontario Chamber of Commerce Rapid Screen Initiative

Small and medium child care organizations located close to a chamber of commerce pick-up location must arrange to pick-up tests through the Ontario Chamber of Commerce [Rapid Screen Initiative](#).

Businesses (including non-chamber members) with 150 employees or less are welcome to participate in this program.

Tests are ordered directly from the local chamber of commerce or board of trade, not from a central provincial website, and must be picked up at a designated location. As part of this program you will also be required to report data to the local chamber of commerce.

Please visit the [Rapid Screen Initiative](#) website to see the list of participating chambers of commerce and boards of trade. Once you have identified your local chamber of commerce, please register through their website and arrange to pick up your tests as soon as possible.

## 3. School Board/School Delivery

Tests are being shipped directly to schools and school boards across the province. These shipments include tests for use in both the school system and child care settings that are more than 10 KM away from a chamber of commerce pick-up location.

Licensees who are picking up at a school will receive their assigned location and additional instructions on how to arrange pick-up from the Ministry of Education shortly.

Licensees will be notified of their assigned delivery/pick-up approach beginning the week of September 7, 2021.

Once a full supply of tests has been received, licensees are to make these testing kits available for those individuals required to confirm a negative test result prior to entering the premises or interacting with children.

### **Interim Approach for Select Licensees**

Work is underway to confirm shipping locations and timeframes; however, it is likely that licensees receiving direct delivery of tests and licensees assigned to a school to pick-up tests will not receive their full supply until later in September.

As an interim approach for these licensees, the government is authorizing pharmacies to provide publicly funded COVID-19 rapid antigen testing services effective Tuesday, September 7, 2021 until Tuesday September 21, 2021. Please see the appendix for the list of participating pharmacies. This is a temporary measure that is only available to

those individuals subject to the mandatory immunization disclosure policy (**i.e., individuals who are not fully vaccinated**). Individuals will be required to show valid ID and a letter from the licensee indicating they are subject to testing requirements. A sample letter is attached.

For those regions where pharmacy-based rapid antigen testing is not available, licensees are to arrange to access testing kits through their local chamber of commerce. This is expected to apply in a minority of situations and leverages a distribution network already in place. Please visit the [Rapid Screen Initiative](#) for more information if this applies to your organization.

### **Verification of Testing**

As part of the testing requirements set out in the immunization disclosure policy, licensees must verify that individuals who are not fully vaccinated have completed tests as required and received a negative result.

Work is also underway on a digital solution for verifying testing results in partnership with [Creative Destruction Lab Rapid Screening Consortium \(CDLRSC\)](#). The Thrive app allows for simple and straightforward tracking and verification of rapid testing results. Individuals can submit photo evidence of their rapid antigen test results for verification by the licensee (if testing at home) or organizations can input verification directly (for onsite rapid testing). The app will also allow exportation of records of verification for record keeping purposes.

Please visit the [Creative Destruction Lab Rapid Screening Consortium \(CDL-RSC\)](#) website for more information on this app. Further information will be shared on how your organization can access this app.

Additional information will be forthcoming on the testing and verification processes of the mandatory immunization reporting policy.

Thank you for your efforts to comply with these requirements and your on-going efforts to keep children, staff, providers and our communities safe.

Sincerely,

Phil Graham

Attachment:

- Sample employer letter to present in pharmacy settings

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