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## Resource guide for licensed child care

### Covid-19 immunization disclosure policy

#### Introduction

As announced on August 17, 2021, an immunization disclosure policy ("policy") will be required for all publicly-funded school board employees, staff in private schools and licensed child care settings and other individuals frequently in these settings who may have direct contact with children, providers and/or staff, for the 2021-22 school year. Regular rapid antigen testing requirements will be in place for individuals who are not fully vaccinated against COVID-19. Individuals who do not intend to be vaccinated, without a documented medical reason, will be required to participate in an educational session about the benefits of COVID-19 vaccination.

Achieving high immunization rates in Ontario's licensed child care sector through vaccination is part of a range of measures and actions that can help prevent and limit the spread of COVID-19 in licensed child care. Vaccination against COVID-19 helps reduce the number of new cases, and, most importantly, severe outcomes including hospitalizations and death due to COVID-19.

The Chief Medical Officer of Health intends to issue instructions for the licensed child care sector ("instructions") that require all child care licensees to have a COVID-19 immunization disclosure policy.

The objectives of the instructions and policy are to:

- support safer child care settings in Ontario;
- set out a provincially consistent approach to COVID-19 immunization disclosure policies;
- optimize COVID-19 immunization rates in licensed child care;
- ensure that individuals have access to information required to make informed decisions about COVID-19 vaccination; and,
- ensure that individuals who are not fully vaccinated against COVID-19 are being routinely tested for COVID-19.

The purpose of this resource guide is to support licensees in implementing their immunization disclosure policy<sup>1</sup> and meeting their obligations under the instructions.

This guide also includes:

- Appendix 1: sample policy template
- Appendix 2: additional resources to support a licensee's educational session
- Appendix 3: Frequently Asked Questions (FAQs)

The Ministry of Education is committed to providing guidance to licensees to assist with implementation. This document will be updated with further guidance shortly, on key areas such as rapid antigen testing requirements and the Ministry of Education's educational session.

#### Immunization Disclosure Policy for Licensed Child Care

Individuals subject to a licensee's immunization disclosure policy will be required to provide proof of one of the following three things:

- 1. Full vaccination against COVID-19; or
- 2. A medical reason for not being vaccinated against COVID-19; or
- **3.** Completion of a COVID-19 vaccination **educational session** prescribed by the Ministry of Education.

Those who are not fully vaccinated<sup>2</sup> will be required to complete COVID-19 rapid antigen testing at a minimum frequency prescribed by the Ministry of Education.

#### Individuals Covered by the Policy

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;

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<sup>2. &</sup>quot;Fully vaccinated against COVID-19" means having received all of the doses required for a COVID-19 vaccine(s) approved by the World Health Organization (e.g., two doses of a two-dose vaccine, or one dose of a single-dose vaccine); and having received the final vaccine dose at least 14 days ago.

- 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)

#### **Providing proof**

#### **Proof of vaccination**

For people who were vaccinated in Ontario, the only acceptable proof of vaccination is the receipt provided by the Ministry of Health to the person who was vaccinated.

After vaccination, individuals with an Ontario photo health card can log in to the provincial portal to download or print an electronic COVID-19 vaccine receipt (PDF) for each dose received.

#### Receipts are available:

- for first and second doses received in Ontario regardless of where you were vaccinated in Ontario (for example, at a mass immunization clinic, hospital, pharmacy, or primary care setting); and
- for doses received out of province, for World Health Organization approved vaccines<sup>3</sup>

To log in to the provincial portal (https://covid19.ontariohealth.ca/) and download vaccine receipt(s), individuals will need the following:

- a green photo health (OHIP) card (numbers from both the front and back)
- date of birth
- postal code

#### Steps to download receipts(s):

- Scroll to the bottom of the page and acknowledge that you have read and understood the terms of use:
- Enter the requested personal information and press "Continue";
- Select "Continue" under the header: "Vaccination Receipts"; and
- Click "Download the Receipt" for the desired vaccination date.

<sup>3.</sup> As of August 24, 2021, all receipts for World Health Organization approved vaccines are available.

Individuals with a red and white health card, or individuals who are having difficulty accessing their vaccine receipt(s) online, should call the Provincial Vaccine Booking Line at 1-833-943-3900. A call centre agent can email a copy of the receipt.

Individuals who have questions or concerns about the information supporting their COVID-19 vaccine receipt should contact their local public health unit for further information.

The physical/hard copy receipt and email version of the receipt a person would have received will resemble the following:



The majority of people who were vaccinated in Ontario were provided a receipt from the Ministry of Health with the individual's name, date of vaccination and product name (i.e., Pfizer, Moderna, etc.). However, there may be some exceptional instances where an individual cannot easily present a copy of their vaccine receipt. The Ministry of Education encourages licensees to work with individuals on a case by case basis to collect acceptable proof of vaccination.

#### Proof of a medical reason for not being vaccinated

Proof must be provided by either a physician or a nurse practitioner (note: a nurse practitioner is a registered nurse who holds an extended certificate of registration under the Nursing Act, 1991).

In some instances, the medical reason for the person not being vaccinated may be time-limited. The note from the physician/nurse practitioner should specify whether the reason is permanent or time-limited. If time-limited, the note should indicate how long it is expected to last. Licensees should communicate this requirement to anyone who is planning on submitting proof of a medical reason.

If an individual is unable to receive their vaccine for a medical reason but that reason is valid for a limited time, the licensee must follow-up with them once that time period has expired and ensure the individual provides proof of vaccination or proof that the individual has completed the educational session approved by the licensee.

#### Proof of completion of an educational session

Individuals who do not intend to be vaccinated, without a documented medical reason, will be required to participate in an educational session about the benefits of COVID-19 vaccination that is approved by the licensee. See following section for more details on the educational session.

Licensees must develop a process for obtaining proof from individuals who have completed the educational session approved by the licensee. Options could include having the person sign a form saying they completed the educational session (i.e. an attestation) or having them answer questions that confirm they have understood the program's content.

Licensees delivering their own educational sessions can make a record of the person's participation directly.

#### Choosing the content for the educational session

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 educational session must be approved by the licensee and must address, at a minimum, all of the following:

- How COVID-19 vaccines work;
- Vaccine safety related to the development of the COVID-19 vaccines;
- Benefits of vaccination against COVID-19;
- Risks of not being vaccinated against COVID-19; and
- Possible side effects of COVID-19 vaccination.

When choosing the content for the educational session that they will be offering, licensees should:

- Consider whether the content meets the requirements specified.
- Consult with their local public health unit.
- Consider the source of the information. Questions to ask include:
  - Is the content from a reputable source?
  - Is the content current?

- Is the content clear and easy to understand?
- Does the content represent the risks and benefits of vaccination fairly and in a transparent manner?
- Does the content respect that it is an individual's personal choice as to whether to get vaccinated?
- Consider whether the content is appropriate for the linguistic and cultural characteristics of the people who will be taking the educational session.

Licensees should also consider and address any accessibility needs of people who will be taking the educational session.

Resources to help support the creation of a licensee's educational session are provided in Appendix 2.

#### **Testing Requirements**

Licensees must require individuals subject to the policy who are not fully vaccinated to submit to regular antigen point of care testing for COVID-19.

For individuals who are not regularly present at the child care premises (e.g., an individual who visits the home child care premises once a month to teach music to the children), frequent testing may not be possible or reasonable. In these cases, the individual must submit to an antigen point of care test as part of screening, prior to interacting with children.

Individuals subject to testing requirements must provide written verification of negative tests results to the licensee. The manner of this verification must be set out in the policy and must enable the licensee to confirm the results at their discretion.

The policy should also identify what steps are to be taken if an individual receives a positive result, including requiring the individual to isolate (e.g., not come to work) and submit to a laboratory-based PCR test to confirm the results as soon as possible (ideally within 48 hours).

More information on the process for obtaining and reporting on antigen tests, as well as the required frequency of testing, will be provided shortly.

#### Communicating about the policy

Licensees are to communicate the content/requirements in the policy to everyone who is subject to the policy, as well as make it available to current and prospective parents.

While licensees should continue to encourage everyone who works at the child care program to get vaccinated, communication about the policy should be provided in a way that respects and supports education and informed choice about COVID-19 vaccination.

#### Sample key messages:

- Vaccinations will help create a safe environment for children, families, staff and providers, which will support the learning, development and well-being of children.
- High rates of vaccination in child care is important to protect all staff, children and families who we provide care for and to help reduce the risk of outbreaks and the need for isolation or closing of programs.
- All vaccines delivered as part of Ontario's vaccine rollout provide high levels of effectiveness against hospitalization and death from COVID-19 and its variants, including the Delta variant.
- We strongly encourage you to get vaccinated if you are eligible and to consult with your doctor on your health history and review any resources that are available to you to make an informed choice about your personal health. We will support you in getting access to vaccination.

#### **Records**

The records required under the instructions may contain personal information, including personal health information. It is critical that licensees put practices in place to ensure this information is kept private. Licensees must ensure they are abiding by their own policies related to personal and confidential information, as well as ensure they are operating in accordance with all applicable privacy legislation.

Licensees must ensure that records required under the instructions are kept in a secure location at the child care centre, home child care agency or home child care premises.

Licensees may wish to request a formal attestation from staff indicating that they are considered "fully vaccinated" against COVID-19 in addition to providing proof of vaccination (i.e. vaccine receipt).

The following language may be considered as part of the attestation form. This language is provided for illustrative purposes only and there is no requirement to use it.

I affirm that I am fully vaccinated against COVID-19.

In this attestation, "fully vaccinated against COVID-19" means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the World Health Organization (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series); and having received the final dose of the COVID-19 vaccine at least 14 days ago.

I affirm that all of the information and answers provided herein and any accompanying supporting documentation are complete, true and correct to the best of my knowledge and belief as required by law. I understand that any misrepresentation, falsification, or omission of any material facts may render this attestation void.

Licensees must ensure that a record of the testing required under the Instruction is kept at the child care centre or home child care agency.

Licensees must ensure that the records required by the instructions are made available for inspection by an inspector or program adviser at all times.

#### **Statistical Information**

In accordance with the instructions, every licensee must collect and maintain the following information:

- the total number of individuals subject to the licensee's policy;
- the number of individuals that provided proof of being fully vaccinated against COVID-19;
- the number of individuals that provided a documented medical reason for not being fully vaccinated against COVID-19; and,
- the number of individuals that completed an educational session about the benefits of COVID-19 vaccination.

In addition to collecting and maintaining the above information, licensees are also required to provide aggregate statistical information to the ministry related to the vaccine status of staff and home child care providers (where applicable).

All licensees must disclose the following to the Ministry of Education:

- the total number of staff subject to the licensee's policy
- the number of staff that provided proof of being fully vaccinated against COVID-19;

- the number of staff that provided a documented medical reason for not being fully vaccinated against COVID-19;
- the number of staff that completed an educational session about the benefits of COVID-19 vaccination; and,
- the number of staff who do not fit into the above categories (partially vaccinated, have not yet submitted documentation, etc.)

In addition, every licensee of a home child care agency shall also report the same breakdown of information for all home child care providers.

Licensees must not provide any identifying information (e.g. personal health information) to the ministry and should communicate to all individuals who are subject to the child care program's policy that information will be shared with the ministry in aggregate form only and without any identifying information.

Data submission will occur on a licence by licence basis using an online form (i.e., submission for one licence at a time).

For large multi-site organizations, an offline reporting template will be made available. This template will allow licensees who operate more than 25 licensed child care centres to submit data for all licensed programs in a single spreadsheet, rather than individually for each licence through the online form. This form must be returned to the Licensed Child Care Helpdesk via email at childcare\_ontario@ontario.ca

Each month that reporting is required, licensees will be provided with a submission deadline, a link to the online questionnaire and a copy of the data reporting template, via memo from the Director of the Child Care Quality Assurance and Licensing Branch.

The ministry is collecting this statistical information under the authority of s. 77 of Ontario Regulation 137/15 under the Child Care and Early Years Act, 2014 (CCEYA), and in accordance with section 70 of the CCEYA. This critical information will help to inform evidence-based planning and policy decisions related to COVID-19 health and safety protocols in early years and child care settings across Ontario.

# Appendix 1 Sample Policy (Minimum Requirements)

## (Insert Child Care Program Name) Covid-19 Immunization Disclosure Policy

#### **Purpose**

The purpose of this policy is to outline organizational expectations with regards to COVID-19 immunization disclosure.

Contingent upon vaccine availability, all eligible individuals, are strongly encouraged to receive a COVID-19 vaccine, unless there is a medical reason to not receive a vaccine.

#### **Background**

(Insert name of child care program) recognizes the importance of immunization of individuals regularly interacting and providing services to children due to the nature of their work and potential for exposure in the community. This COVID-19 immunization policy aims to protect the child care program's population including children, staff, volunteers, students on educational placements and any person providing child care or other services to a child in care.

COVID-19 is an acute respiratory illness caused by the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2). It may be characterized by fever, cough, shortness of breath, and several other symptoms. Asymptomatic infection is also possible. The risk of severe disease increases with age but is not limited to the elderly and is elevated in those with underlying medical conditions.

#### **Application of the Policy**

The Immunization Disclosure Policy will apply to the following groups of individuals, except where the individual works remotely and the individual's work does not involve in-person interactions:

- Employees of the licensee (including home visitors in the case of home child care);
- 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 person who provides child care or other services to a child who receives child care (e.g., special needs resourcing consultant)

#### **Policy**

The Chief Medical Officer of Health has directed all licensed child care programs to develop, implement and ensure compliance with a COVID-19 immunization disclosure policy. All individuals covered by this policy must provide one of the following:

- **1.** Proof of all required doses of a COVID-19 vaccine approved by the World Health Organization.
- **2.** Written proof of a medical reason, provided by either a physician or nurse practitioner that sets out:
  - a. that the person cannot be vaccinated against COVID-19; and
  - **b.** the effective time period for the medical reason (i.e., permanent or time-limited).
- **3.** Proof that the individual has completed an educational session approved by (insert child care name)

#### **Educational session**

The educational session has been approved by and/or provided by (insert child care name) and addresses all of the following learning components:

- how COVID-19 vaccines work;
- vaccine safety related to the development of the COVID-19 vaccines;
- benefits of vaccination against COVID-19;
- risks of not being vaccinated against COVID-19; and
- possible side effects of COVID-19 vaccination.

#### **Support for Vaccination**

(insert child care name) will provide the following supports for people subject to this policy to receive a vaccine:

(for example: paid time off, assistance with booking vaccine appointment, peer-to-peer support, etc.).

#### **Testing Requirements**

Individuals subject to the policy who are not fully vaccinated must regularly complete an antigen point of care testing for COVID-19 and demonstrate a negative result, every (fill in the blank); and provide written verification of the negative test result (insert details on acceptable documentation).

#### **Confidentiality Statement**

As per s. 77 of O. Reg 137/15 made under the Child Care and Early Years Act, 2014, (name of child care program) is required to report such statistical information to the Ministry of Education as may be required. No identifying information will be provided to the ministry in relation to this policy; all statistical information will be provided in aggregate form.

#### Disclaimer:

This document is an example of a policy. It is intended for illustrative purposes only. It is the responsibility of the licensee to ensure that the information included in their policy meets all requirements applicable legislation and reflects the individual circumstances and needs of each centre or home child care premises in accordance with the Child Care and Early Years Act, 2014 and its regulations.

Please be advised that this example of a policy does not constitute legal advice and should not be relied on as such.

Ministry staff will continue to enforce such legislation based on the facts as they may find them at the time of any inspection or investigation.

## Appendix 2 Resources

# Resources to support the creation of a licensee's educational session

#### **English Only**

COVID-19 Vaccines for Ontario (Ontario Ministry of Health)

**COVID-19 Vaccine Facts** (Ontario Ministry of Health)

Gashkiwidoon toolkit: Covid-19 Vaccine Implementation (Indigenous Primary Health Care Council)

Ontario's doctors answer COVID-19 vaccine questions (Ontario Medical Association)

**Updates on COVID-19** (National Collaborating Centre for Indigenous Health)

#### **Bilingual - English and French**

Building Confidence in Vaccines [English] /Accroître la confiance à l'égard des vaccins [French] (Public Health Ontario)

Communicating effectively about immunization: Canadian Immunization Guide (Government of Canada)

Communication efficace concernant l'immunisation : Guide canadien d'immunisation (Government of Canada)

COVID-19 Info [English] (Immunize Canada) / Informations sur la COVID-19 pour le grand public [French] (Immunisation Canada)

COVID-19 vaccines and workplace health and safety: Learn how COVID-19 vaccines help protect you and make your workplace safer [English] and Les vaccins contre la COVID-19 et la santé et la sécurité au travail: Découvrez comment les vaccins contre la COVID-19 contribuent à vous protéger et à rendre votre lieu de travail plus sécuritaire [French] (Ontario Ministry of Labour, Training and Skills Development)

COVID-19: Vaccines | Centre for Effective Practice - Digital Tools (Centre for Effective Practice)

#### Multilingual

COVID-19: Vaccine Resources and in American Sign Language (City of Toronto)

Coronavirus disease (COVID-19): Awareness resources (Government of Canada)

**COVID-19 Vaccines Explained (World Health Organization)** 

#### Disclaimer:

The Ministry of Education and the Province of Ontario do not assume any responsibility for the content of any of the resources listed above.

The inclusion of the resources in the list above does not constitute an endorsement of the resource or the organization/entity that developed the resource.

Licensees should seek legal advice on the use of any resources/materials that hold a patent, copyright, trademark, or other proprietary rights.

If a licensee wishes to use any or all of the resources in the list above, the licensee should clearly and expressly attribute sources appropriately.

# **APPENDIX 3 Frequently Asked Questions (FAQs)**

# Licensed Child Care COVID-19 Immunization Disclosure Policy

## 1. What are the requirements in the instructions the Chief Medical Officer of Health intends to issue?

Child care licensees will be required to establish and implement a COVID-19 immunization policy for child care centre staff, home child care providers, home child care visitors, every adult who is ordinarily a resident of the premises or regularly at the premises, volunteers and students on educational placements and any person who provides child care or other services to a child who receives child care (e.g., special needs resourcing consultant). At a minimum, the policy must require these individuals to do one of three things:

- Provide proof of COVID-19 vaccine administration; OR
- Provide a documented medical reason for not being vaccinated against COVID-19;
   OR
- Participate in an educational session about COVID-19 vaccination if not providing proof of vaccination or a medical reason.
- Individuals who are not fully vaccinated must also be required to submit to regular testing for COVID-19.

#### 2. Why is the CMOH requiring licensees to have an immunization disclosure policy?

Achieving high immunization rates in Ontario's child care settings through vaccination is part of a range of measures and actions that can help prevent and limit the spread of COVID-19 in child care. Vaccination against COVID-19 helps reduce the number of new cases, and, most importantly, severe outcomes including hospitalizations and death due to COVID-19.

The objective of this requirement is to:

- set out a provincially consistent approach to COVID-19 vaccination policies in licensed child care;
- optimize COVID-19 vaccination rates in licensed child care; and
- ensure that people have access to information required to make informed decisions about COVID-19 vaccination.

#### 3. When are these requirements coming into effect?

Instructions are expected to be issued shortly. This guide is being provided to give licensees lead time to develop or adapt their policies and undertake implementation activities with the need to have the policy in place as soon as possible to protect children, families, staff and providers. Dates for compliance will be communicated soon, once instructions have been issued..

# **4.** Who is responsible for ensuring that the required individuals are notified of the licensed child care program's immunization disclosure policy?

Licensees are responsible for communicating the requirements to all individuals that are subject to the policy, as well as making the policy available to parents.

While licensees should continue to encourage and support all people who work or otherwise attend child care program to get vaccinated, communication about the policy should be provided in a manner that supports education and informed choice about COVID-19 vaccination.

#### 5. What must be included in an immunization disclosure policy?

- Every licensee must establish and implement a written disclosure policy on COVID-19 immunization and ensure that all individuals subject to the policy comply with its requirements.
- At a minimum, the child care program's policy on COVID-19 must set out:
- individuals subject to the policy
- proof of COVID-19 vaccine administration or proof of medical reason or proof of completion of an educational session.
- requirement regarding the reporting of statistical information related to the ministry
- requirements related to testing for unvaccinated individuals

See appendix A - sample policy template for specific details.

# **6.** What happens if someone has had their first dose of a two dose vaccine series but will not provide proof of a second dose even though it's been several months since he/she got their first dose?

If a person subject to the program's immunization policy provides proof of having received the first dose of a two-dose vaccine series and fails to provide proof of having received the second dose, the licensee would then be required to ask the person to either provide a medical reason for not receiving the second dose or participate in an educational session and continue to complete regular COVID-19 testing.

#### 7. How are licensees expected to choose content for their educational session?

When choosing the content for the educational session that they will be offering, licensees should:

- Consider whether the content meets the requirements regarding what a program's educational session must address.
- Consult with the local public health.
- Consider the source of the information. Questions to ask include:
  - Is the content from a reputable source?
  - Is the content current?
  - Is the content clear and easy to understand?
  - Does the content represent the risks and benefits of vaccination fairly and in a transparent manner?
  - Does the content respect that it is an individual's personal choice as to whether to get vaccinated?
- Consider whether the content is appropriate for the linguistic and cultural characteristics of the person(s) who will be undertaking the educational session.

Licensees should also consider and address any accessibility needs of people who will be taking the educational session.

#### **8.** How will programs have access to an educational session?

Licensees are responsible for identifying and approving an educational session that meet requirements noted in the previous question. See Appendix 2 for a list of resources.

An educational resource will also be made available to licensees and additional information will be communicated shortly.

## **9.** Do unvaccinated individuals need to complete the educational program more than once?

Individuals will not be required to complete the educational session more than once.

# **10.** What if a person objects to being vaccinated against COVID-19 on religious/conscientious grounds??

If an individual objects to vaccination for any reason other than a medical reason, including based on religious or conscientious grounds, the licensee would be required to ensure that the individual participates in an educational program, and undergoes regular rapid antigen testing.

As it stands, a medical exemption is the only reason an unvaccinated individual would not be required to participate in an education program. Other than for a medical

reason, individuals are not required to make any disclosure on their reason for not being fully vaccinated, nor are licensees expected to collect or report this information.

# **11** What if an individual has a medical condition that prevents them from being vaccinated?

If there is a medical reason that the person cannot be vaccinated, the licensee must ensure that the individual provides the licensee with written proof of a medical reason, provided by either a physician or registered nurse in the extended class (commonly referred to as a nurse practitioner). The written proof must include that the person cannot be vaccinated against COVID-19 and the effective time period for the medical reason (i.e., permanent or time-limited). If the reason is time-limited, the written proof must set out how long the reason is in place (e.g. 6 months, 1 year, etc.).

These individuals must also submit to regular COVID-19 testing in accordance with the policy.

#### 12. What is an acceptable proof of vaccination?

For people who were vaccinated in Ontario, the only acceptable proof of vaccination is presenting the actual or a copy of the physical or electronic receipt provided by the Ministry of Health to each person who has been vaccinated in Ontario. Individuals who misplace their receipt can obtain a replacement copy by logging into the provincial vaccine portal.

For persons vaccinated outside of Ontario, licensees must ensure the proof being provided by the other jurisdiction is valid and that the vaccine administered is one of the ones that has been approved by Health Canada.

#### 13. What is an acceptable proof of having completed the educational session?

Licensees must set out in their policy the ways in which individuals will provide proof that they have completed the educational session. This could take the form of having the individual sign an attestation or complete a short quiz to gauge the person's understanding of the content provided through the educational session.

Licensees delivering their own programs can record the person's participation directly in a manner they see fit.

# **14** How will testing be implemented for individuals who are not at the child care premises every day?

For individuals who are deemed covered by the immunization disclosure policy but are less frequently present at the premises (e.g., an individual who visits the premises once per month to teach music to the children), frequent testing may not be possible or reasonable. In these cases, the individual must submit to a rapid antigen test as part of screening, prior to interacting with children, providers or staff.

**15.** My child care centres has special needs consultants that only come on site for 2 hours once a week; would they be subject to the COVID-19 immunization disclosure policy?

A licensee's COVID-19 immunization disclosure policy must apply to any other person who provides child care or other services to a child who receives child care, including consultants or other professionals who may only be on site once a week.

**16.** Do individuals who are on leave from work (e.g. pregnancy/parental leave, sick leave, extended personal leave, etc.) or who work remotely have to comply with the immunization disclosure policy?

Individuals who work remotely and whose work does not involve in-person interactions are excluded from the requirement. Individuals who are on a leave from work and are not attending child care settings or in direct contact with other staff, providers or children are not subject to this policy until they return to work. Home child care providers who do not currently have an active agreement with a home child care agency are also not subject to the policy.

**17.** How much time do newly hired individuals have to come into compliance with a licensee's immunization disclosure policy?

It is expected that newly hired or contracted individuals would provide an attestation where applicable on or before the first day of work/provision of childcare and provide proof as required under the policy as soon as possible thereafter.