

TO: Child Care Licensees

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

DATE: September 2, 2021

SUBJECT: Immunization Disclosure Policy and Health and Safety Updates

Thank you again for your continued commitment to supporting children, families, and educators in child care and early years programs. It is because of your hard work and dedication that child care settings have remained healthy, safe, and available for families over the past 18 months.

Immunization Disclosure Policy

I am writing today in follow-up to the memo you received on August 18, 2021 related to the government's recent announcement of an immunization disclosure policy for all licensed child care settings.

The Chief Medical Officer of Health will be issuing instructions for licensed child care in accordance with the authority granted by the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020*. These instructions require that all licensees establish, implement and report on a COVID-19 Immunization Disclosure Policy. All licensees under the *Child Care and Early Years Act, 2014* are subject to these requirements until such time as they are revoked/rescinded.

Requirements will come into effect on **September 7, 2021** and are anticipated to be in force for the 2021/22 school year. Recognizing that licensees will require time to implement the changes, dates for compliance will be communicated soon, once instructions have been issued.

Vaccination is one of the most important tools for helping stop the spread of COVID-19 and is a particularly important tool for adults working with young children who are not yet able to receive a vaccine. Promoting vaccination through a consistent provincial policy for schools and licensed child care settings will support our children, families and communities in the coming months.

Please find attached, to support you in meeting your obligations, a copy of the instructions, as well as a resource guide specific to child care. The resource guide includes a frequently asked questions section, as well as a sample policy you can adapt and implement in your own program.

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.

Statistical Data Submission

Licensed child care programs are also required to provide statistical information to the ministry related to the vaccine status of staff and home child care providers. Only aggregate numbers are to be submitted - no personal health information or identifiable information should be provided to the ministry.

As a licensed child care program, you are subject to these reporting requirements and will be required to submit data to the Ministry of Education on a monthly basis. More details are provided in the attached resource guide.

All licensees operating fewer than 25 child care centres, as well as all home child care agencies, must report using an online form. One form must be submitted for each licence. Licensees operating more than 25 licensed child care centres may choose to report using a Ministry of Education reporting template (e.g., Excel spreadsheet) that includes all of their licences. If you would like to use this template, please email the Licensed Child Care Helpdesk at childcare_ontario@ontario.ca.

The deadline for your first data submission is **September 15, 2021**.

You can access the online form at the following link:

COVID-19 Immunization Disclosure Questionnaire

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.

It is also expected that licensees ensure they have their own policies and practices in place related to the collection of personal information. Licensees must ensure they are abiding by these policies and operating in accordance with all applicable privacy legislation. If you have additional questions about how this applies to your specific program, you may wish to consult your own legal counsel.

Other Health and Safety Updates

As you are aware, on August 3, 2021 the [Operational Guidance for Child Care During COVID-19 Outbreak](#) document was updated. These changes are based on advice and support by the Chief Medical Officer of Health. To support those updates, amendments have been made to the COVID-19 specific rules in the child care licensing regulation, O.Reg 137/15 under the *Child Care and Early Years Act, 2014*.

The following regulatory changes will take effect shortly:

- Licensees are no longer required to ensure daily attendance records for child care staff that include contact information and time of arrival and departure.
- Essential volunteers are no longer prohibited in licensed childcare settings
- Licensees are no longer permitted to implement COVID-19 policies and protocols that prohibit parents from entering the child care premises.

Licensees may continue to offer drop off and pick up procedures where parents do not enter the premises; however, if a parent wishes to enter the premises, they must be permitted to do so, unless a licensee is implementing a direction of a medical officer of health in respect of COVID-19.

If parents and volunteers do enter the child care premises, licensees must ensure all requirements for those who enter the premises are met, including screening for symptoms of COVID-19 and maintaining up-to-date daily attendance records that include time in and time out.

Updates to Operational Guidance for Child Care and Early Years Programs

In light of the current public health environment and based on advice from the Chief Medical Officer of Health, masking requirements for child care and early years workers have been updated.

Medical masks (surgical/procedural) are required to be worn by child care and early years staff/providers outdoors if two metres of distance from others cannot be maintained. Eye protection is also required if a staff member/ provider comes within two metres of an unmasked individual both indoors and outdoors, as per occupational health and safety requirements. At the advice of the local public health unit, licensees and providers may choose to implement additional masking measures based on local circumstances.

The ministry is working to update the child care, before and after school programs, EarlyON Child and Family Program, and First Nations child care and child and family program guidance documents to reflect this change and they will be made available shortly. We encourage you to communicate this information as soon as possible to your communities, including child care and early years staff and providers as well as parents/families.

The government will monitor the COVID-19 situation, including ongoing risks related to variants of concern (VOCs), and alignment with broader provincial guidance and direction. The ministry will continue to work with the Chief Medical Officer of Health and local public health units (PHUs) to assess key measures to inform and update provincial guidance and direction, including lifting measures when appropriate.

As always, child care licensees must comply with any direction of their local public health unit. Licensees may also choose to implement additional measures based on local circumstances in consultation with local public health.

Once again, I want to reiterate my sincerest appreciation for your ongoing work and dedication during these unprecedented times. Child care professionals have provided a trusted and safe environment for our children and a critical service for families and parents – for that I thank you.

Sincerely,

Phil Graham

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