

Contents

| | |
|--|----|
| General..... | 1 |
| Vaccines | 3 |
| Timelines and Other Considerations | 4 |
| Vaccination Exemptions..... | 6 |
| Testing..... | 8 |
| Reporting | 11 |

Note: This document is intended to provide guidance to postsecondary education (PSE) institutions, including Training Delivery Agents (TDAs) but should not be relied on as medical or legal advice. In the event of any conflict between this document and any applicable legislation or any orders, directives, or instructions issued by the government, including the Office of the Chief Medical Officer of Health, the legislation, order, directive, or instructions prevail(s). PSE institutions and TDAs are responsible for their compliance with any applicable requirements and are encouraged to consult with their legal counsel and local public health units on the development and implementation of COVID-19 vaccination policies.

General

1. Under what authority are COVID-19 vaccination policies required at postsecondary education (PSE) institutions and Training Delivery Agents (TDAs)?

Under subsection 2(2.1) of Schedule 1 and Schedule 4 of [O. Reg. 364/20: Rules for Areas at Step 3 and at the Roadmap Exit Step](#) under the [Reopening Ontario \(A Flexible Response to COVID-19\) Act, 2020](#) (ROA), the person responsible for a business or organization that is open shall operate the business or organization in compliance with any advice, recommendations, and instructions issued by the Office of the Chief Medical Officer of Health (OCMOH) or by a medical officer of health after consultation with the OCMOH:

- requiring the business or organization to establish, implement and ensure compliance with a COVID-19 vaccination policy; or
- setting out the precautions and procedures that the business or organization must include in its COVID-19 vaccination policy.

The OCMOH issued instructions that are applicable to the PSE institutions listed, including TDAs, except for Indigenous Institutions, in the Instructions.

All approved Training Delivery Agents are covered by the Instructions, including non-college TDAs, as the Instruction from the Ontario Chief Medical Officer of Health specifically includes “a person approved to provide training for apprenticeship programs” as stated in paragraph 5 of section 64 of the Ontario College of Trades and Apprenticeship Act, 2009.

2. Can postsecondary education (PSE) institutions and Training Delivery Agents (TDAs) implement policies that are more stringent or include additional requirements?

PSE institutions and TDAs have the flexibility to develop and implement policies that are more stringent than requirements set out in the Instructions issued by the Office of the Chief Medical Officer of Health.

PSE institutions and TDAs are encouraged to consult with their legal counsel and work with their local public health units and other relevant stakeholders and communities as they develop and implement their policies.

3. How is “fully vaccinated” defined?

As indicated in the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), “fully vaccinated” means having received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by the WHO (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.

4. Who do the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH) about COVID-19 vaccination policies apply to?

The Instructions issued by the OCMOH apply to all postsecondary education (PSE) institutions including Training Delivery Agents (TDAs) except for Indigenous Institutes.

As per the Instructions, PSE institutions listed, including TDAs must establish, implement, and ensure compliance with a COVID-19 vaccination policy with respect to its employees, staff, contractors, volunteers, and students who attend campus. The COVID-19 vaccination policy must include the precautions and procedures set out in the Instructions issued by the OCMOH.

5. Does the COVID-19 vaccination policy apply to visitors?

Per the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), COVID-19 vaccination policies apply to employees, staff, contractors, volunteers, and students including apprentices who attend campus.

Postsecondary education institutions and Training Delivery Agents have the flexibility to implement policies that are more stringent than the Instructions issued by the OCMOH.

6. Considering that there will be COVID-19 vaccination policies at postsecondary education (PSE) institutions including Training Delivery Agents (TDAs), will physical distancing requirements and capacity limits at PSE institutions still apply?

Yes, physical distancing and capacity limits requirements continue to apply except for indoor in-person instructional spaces at the PSE institution, including TDAs.

Amendments were recently made to [O. Reg. 364/20: Rules for Areas at Step 3 and at the Roadmap Exit Step](#) under the [Reopening Ontario \(A Flexible Response to COVID-19\) Act, 2020, S.O. 2020, c. 17](#), which will, effective September 7, 2021, remove physical distancing requirements and capacity limits for indoor instructional spaces (e.g., classrooms; laboratories; libraries; in-person experiential learning).

At this time, the changes in physical distancing requirements and capacity limits noted above for indoor instructional spaces do not apply to Indigenous Institutes, unless the Indigenous Institute implements a COVID-19 vaccination policy that is consistent with the Instructions issued by the Office of the Chief Medical Officer of Health for PSE institutions.

7. Does the COVID-19 vaccination policy apply to students and apprentices training in outdoor spaces?

Per the Instructions issued by the Office of the Chief Medical Officer of Health, COVID-19 vaccination policies apply to all employees, staff, contractors, volunteers, and students including apprentices who attend campus. The Instructions apply to those individuals in all areas (indoors and outdoors) of the postsecondary education (PSE) institution's campus(es) and Training Delivery Agent's site(s).

8. Does the COVID-19 vaccination policy apply to host placement locations for practicums?

Per the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), COVID-19 vaccination policies apply to employees, staff, contractors, volunteers, and students including apprentices who attend campus. This includes all areas (indoors and outdoors) of the postsecondary education (PSE) institution's campus(es) and Training Delivery Agent's site(s). Areas off campus or offsite may be subject to separate requirements.

Vaccines

9. What are the eligible vaccines for an individual to be considered fully vaccinated?

Per the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), "fully vaccinated" means having received the full series of a COVID-19

vaccine or combination of COVID-19 vaccines approved by the World Health Organisation (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.

It is important to note that this does not change the federal government's eligibility requirements for international travelers to qualify for the [fully vaccinated traveller exemptions](#) when entering Canada. For international travelers to be considered fully vaccinated they must—among other requirements—have received the full series of a vaccine or a combination of vaccines accepted by the Government of Canada (Pfizer/BioNTech; Moderna; Oxford/AstraZeneca; Janssen-Johnson & Johnson); and received their last dose at least 14 days prior to entry.

10. What happens if an individual only has one dose but not both? Do they have to be fully vaccinated, and if so, by when?

The Instructions issued by the Office of the Chief Medical Officer of Health require that individuals who do not provide proof of being fully vaccinated against COVID-19:

- submit to regular antigen point of care testing for COVID-19 at an interval to be determined by postsecondary education (PSE) institutions and Training Delivery Agents (must be at minimum of once every seven days).
- provide verification of a negative test result in the manner determined by PSE institution that enables it to confirm the result at its discretion.

Individuals who are partly vaccinated (have received one dose of a two-dose vaccine series, or a final dose of a two-dose vaccine series within the last 14 days), should undertake antigen testing until they are fully vaccinated.

11. If an individual has one dose and has not yet had time to obtain the second dose but is in the process of doing that, does the individual have to undergo testing?

Yes, individuals who are partly vaccinated (have received one dose of a two-dose vaccine series, or a final dose of a two-dose vaccine series within the last 14 days), should undertake antigen testing until they are fully vaccinated.

Timelines and Other Considerations

12. What is the implementation date for this policy for postsecondary education (PSE) institutions and Training Delivery Agents (TDAs)?

In accordance with the Instructions issued by the Office of the Chief Medical Officer of Health, all PSE institutions including TDAs, with the exception of Indigenous Institutes, are required to have mandatory COVID-19 vaccination policies in place by September

7, 2021.

13. What happens if the trajectory of the COVID-19 pandemic drastically changes?

The Office of the Chief Medical Officer of Health and health experts will continue to review data and provide advice to the government on the appropriate and effective measures that are needed to protect the health of Ontarians.

The Ministry of Labour, Training and Skills Development will communicate with Training Delivery Agents on any changes that impact the sector.

14. Can Training Delivery Agents (TDAs) opt out of the COVID-19 vaccination policy requirements?

TDAs cannot opt out of implementing mandatory COVID-19 policies. The Instructions issued by the Office of the Chief Medical Officer of Health apply to the PSE institutions listed in the Instructions including TDAs. Indigenous Institutes are not required to implement a vaccination policy at this time.

TDAs are encouraged to review the requirements set out in [O. Reg. 364/20: Rules for Areas at Step 3 and at the Roadmap Exit Step](#) under the [Reopening Ontario \(A Flexible Response to COVID-19\) Act, 2020](#).

15. What is an acceptable source of proof for full COVID-19 vaccination status?

For those who were vaccinated in Ontario, they were provided the physical (hard copy) and email version of the receipt from the Ministry of Health with the individual's name, date of vaccination and product name (i.e., Pfizer, Moderna etc.) at the time of vaccination. COVID-19 vaccination receipts can also be downloaded or printed through the [COVID-19 vaccination provincial portal](#) or by calling the Provincial Vaccine Booking Line at 1-833-943-3900. This version of the COVID-19 vaccination receipt contains a watermark and a digital signature to deter forgery.

While the physical or email COVID-19 vaccination receipt can be provided as a method of demonstrating proof of vaccination, Training Delivery Agents may also accept attestations of full vaccination against COVID-19 until October 29, 2021. In the coming weeks, the province will be rolling out a QR code version of the vaccine passport that can be used as proof of vaccination.

16. Will Training Delivery Agents (TDAs) have to sign an attestation confirming their COVID-19 vaccination policy is in place?

At this time, the Ministry of Labour, Training and Skills Development is not requiring TDAs to sign attestations to confirm whether COVID-19 vaccination policies are in place. However, public health officials/inspectors could still walk-in and verify that the policies are in place and could issue sanctions for non-compliance.

17. When a Training Delivery Agent (TDA) implements its COVID-19 vaccination policy, is indoor masking still required?

Yes. Indoor masking is required. Masking requirements are set out in [O. Reg. 364/20: Rules for Areas at Step 3 and at the Roadmap Exit Step](#).

Masking continues to be required in indoor instructional spaces.

Guidance on face coverings and masks is available through this [webpage](#).

18. The local public health guidance for workplaces indicates that where physical distancing cannot be maintained, safety goggles and medical grade masks are required. Can the Ministry confirm that additional personal protective equipment (PPE) is not required when regular masks are used, and all individuals are fully vaccinated against COVID-19?

Training Delivery Agents must comply with any applicable municipal by-laws, section 22 orders issued by local Medical Officers of Health under the *Health Protection and Promotion Act* (HPPA), any applicable public health advice, recommendations and instructions of the local Medical Officer of Health, and any other applicable instructions, policies, or guidelines issued by the Government of Ontario.

Vaccination Exemptions

19. What are the requirements for individuals who cannot provide proof of full vaccination against COVID-19?

As outlined in the Instructions from the Office of the Chief Medical Officer of Health (OCMOH), the postsecondary education (PSE) institutions listed in the Instructions issued by the OCMOH including Training Delivery Agents (TDAs) must establish, implement, and ensure compliance with a COVID-19 vaccination policy requiring its employees, staff, contractors, volunteers, and students who attend campus to provide proof of full vaccination against COVID-19, or:

- written proof of a medical reason, provided by a physician or registered nurse in the extended class—which refers to nurse practitioners, who have a scope of practice that allows patient diagnosis and treatment—that sets out:
 - a documented medical reason for not being fully vaccinated against COVID-19; and
 - the effective time-period for the medical reason.
- proof of completing an educational session approved by the PSE institution or TDA about the benefits of COVID-19 vaccination prior to declining vaccination for any reason other than a medical reason. PSE institutions and TDAs will need to provide an educational session that they approved that, at minimum,

addresses the matters set out in the Instructions issued by the OCMOH.

As part of their COVID-19 vaccination policies, TDAs may decide to remove the option for an individual to provide proof of having completed an educational session as an exemption. TDAs must still provide an educational session to those individuals to whom the Instruction applies to, even though those individuals may not be allowed on campus.

TDAs are encouraged to consult with their legal counsel as they work to develop and implement their policies.

20. Can proof of a medical exemption from the COVID-19 vaccination policy be obtained from a physician or registered nurse overseas?

Each Training Delivery Agent (TDA) is responsible for determining whether they will accept medical documentation from overseas practitioners. TDAs are encouraged to consult with their legal counsel as they work to develop and implement their policies.

21. Do Training Delivery Agents (TDAs) have to provide accommodations to unvaccinated students and apprentices?

As outlined in the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), the PSE institutions listed including TDAs must establish, implement, and ensure compliance with a COVID-19 vaccination policy—effective September 7, 2021—that applies with respect to its employees, staff, contractors, volunteers, and students including apprentices who attend campus.

TDAs are encouraged to consult with their legal counsel as they work to develop and implement their policies.

22. Will individual Training Delivery Agents (TDAs) have to develop an educational session, or will there be access to a common set of training materials or a common platform?

TDAs must make available an educational session that they approve that, at minimum, addresses the topics set out in the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH). COVID-19 educational sessions, at minimum, must address:

- how COVID-19 vaccines work;

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

TDAs may elect to use an educational session developed by a third party, create their own educational session, or work together to develop a common educational session. TDAs may want to consider the following resources:

- [Building Confidence in Vaccines](#)
- [Communicating effectively about immunization: Canadian Immunization Guide](#)
- [Coronavirus disease \(COVID-19\): Awareness resources](#)
- [COVID-19 Information for the Public](#)
- [COVID19 Vaccination: Making an Informed Decision MLTC](#)
- [COVID-19: Vaccines | Centre for Effective Practice - Digital Tools](#)

The Ministry of Labour, Training and Skills Development 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. TDAs should seek legal advice on the use of any resources/materials that hold a patent, copyright, trademark, or other proprietary rights.

Testing

23. Is it mandatory for Training Delivery Agents (TDAs) to provide rapid antigen testing?

As set out in the Instructions issued by the Office of the Chief Medical Officer of Health, individuals who do not provide proof of being fully vaccinated against COVID-19, must:

- submit to regular antigen point of care testing for COVID-19 (rapid antigen testing) at an interval to be determined by PSE institutions (must be at a minimum of once every seven days); and
- provide verification of the negative test result in the manner determined by the PSE institution that enables it to confirm the result at its discretion.

It is the responsibility of TDAs to ensure that the Instructions of the OCMOH are implemented.

Individuals who are partly vaccinated (have received one dose of a two-dose vaccine series, or a final dose of a two-dose vaccine series within the last 14 days), are required to undertake antigen testing until they are fully vaccinated.

24. What if a Training Delivery Agent (TDA) does not implement rapid antigen testing effective September 7, 2021?

In accordance with the Instructions issued by the Office of the Chief Medical Officer of Health, all PSE institutions including TDAs, with the exception of Indigenous Institutes, are required to have mandatory COVID-19 vaccination policies in place effective September 7, 2021. This includes the requirement for rapid antigen testing.

The testing interval is determined by the TDA, but must be a minimum of once every seven days.

25. How can a postsecondary education (PSE) institution access rapid antigen testing kits?

TDAs can apply for the [Provincial Antigen Screening Program \(PASP\)](#) online or through their local Chamber of Commerce .

To access rapid testing kits, TDAs institutions will need to:

- Apply for the PASP online or via their local Chamber of Commerce and agree to the program terms and conditions.
- Notify their local Public Health Unit before testing begins.
- Review onboarding and training materials.
- Order free test kits from the province of Ontario or, private institutions are encouraged to pick up kits from their local Chamber of Commerce.
- Report de-identified data to the province each week.
- Properly handle and dispose of used test kits.

Small and medium-sized businesses, with 150 employees or less, are welcome to participate in their local Ontario Chamber of Commerce [COVID-19 Rapid Screening Initiative](#). Membership with the Ontario Chamber of Commerce is not required to participate in this initiative. Any small and medium-sized businesses can apply for this initiative through the link above and click on the chamber or board of trade in your region to order your tests online.

TDAs are responsible for the program implementation costs (e.g., human resource expenses, supplies).

26. Can the rapid testing kits be used for at-home testing?

Rapid antigen testing is an additional screening method that can help stop the spread of COVID-19. Organizations can test on-site or at-home and get results in about 15 minutes without shipping to a lab. As outlined in the [COVID-19 Guidance: Considerations for](#)

[Antigen Point-of-Care Testing](#) (PDF), rapid antigen testing may be performed at least one time per week, and up to 2-3 times per week for individuals who are not fully vaccinated.

Generally, however, rapid antigen testing is not recommended for individuals who are fully vaccinated (i.e., ≥ 14 days after receiving their second dose of a two-dose COVID-19 vaccine series or their first dose of a one-dose COVID-19 vaccine series).

Please note that if an individual has tested positive for COVID-19 in the past 90 days, an antigen point of care testing is not recommended. In this instance, the individual shall provide proof of a positive COVID-19 result in the past 90 days. Once the 90-day period has passed, the individual will be required to complete regular antigen point of care testing unless they have become fully vaccinated during that time.

It should be noted that any individual doing self-swabbing must consult the [self-swabbing training resource](#) developed by Ontario Health in collaboration with Public Health Ontario and ensure that they have appropriate knowledge, skills and judgment to perform the test. Individuals and organizations are under no obligation to conduct rapid testing using supervised or unsupervised self-swabbing. That is to be done only on a voluntary basis.

Training Delivery Agents are encouraged to review the [COVID-19 Guidance: Considerations for Antigen Point-of-Care Testing](#) for guidance on conducting rapid antigen testing, including organizational considerations and responsibilities for individuals who perform rapid antigen testing at home (i.e., unsupervised self-swabbing).

27. Are results from antigen tests that individuals take at the border acceptable?

As set out in the Instructions issued by the Office of the Chief Medical Officer of Health, individuals who do not provide proof of being fully vaccinated against COVID-19 must provide verification of a negative test result in the manner determined by the Training Delivery Agent that enables it to confirm the result at its discretion.

28. Is there sufficient supply of rapid antigen testing kits considering the anticipated increase of demand as a result of the COVID-19 vaccination policy requirements across high-risk areas?

The Ministry of Health continually engages in supply and demand modelling to ensure there is a sufficient provision of government-funded rapid antigen tests.

Reporting

29. Will Training Delivery Agents (TDAs) have to report to the Ministry of Labour, Training and Skills Development (MLTSD) on their COVID-19 vaccination policies?

The Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH) require that individuals who do not provide proof of being fully vaccinated against COVID-19:

- Submit to regular antigen point of care testing for COVID-19 at an interval to be determined by the TDA (must be at minimum of once every seven days).
- Provide verification of a negative test result in the manner determined by the TDA that enables it to confirm the result at its discretion.
- Individuals who are partly vaccinated (have received one dose of a two-dose vaccine series, or a final dose of a two-dose vaccine series within the last 14 days), should undertake antigen testing until they are fully vaccinated.
- In accordance with the Instructions issued by the OCMOH, PSE institutions, with the exception of Indigenous Institutes, are required to have mandatory COVID-19 vaccination policies in place effective September 7, 2021. This includes the requirement for rapid antigen testing.
- The testing interval is determined by the PSE institution, but must be a minimum of once every seven days.

Per the Instructions issued by the Office of the Chief Medical Officer of Health (OCMOH), PSE institutions including TDAs are required to collect, maintain, and disclose statistical (non-identifiable) information to the MLTSD in the manner and within the timelines specified by MLTSD.

TDAs must report to MLTSD on a monthly basis. MLTSD will communicate information about reporting and timelines in the weeks ahead.

In the coming weeks, MLTSD will work with TDAs on reporting requirements.

30. How should Training Delivery Agents (TDAs) collect vaccination data from individuals?

TDAs are encouraged to consult with their legal counsel and work with their local public health units as they develop and implement their policies.

TDAs must collect, maintain, and disclose statistical (non-identifiable) information as outlined in the Instructions issued by the Office of the Chief Medical Officer of Health.

31. Will the Ministry of Labour, Training and Skills Development (MLTSD) make data received from Training Delivery Agents (TDAs) public? If so, when? Will MLTSD be sharing data with other government partners including public health units or the federal government?

MLTSD may disclose any aggregated statistical information provided by TDAs pursuant to the Instructions issued by the Office of the Chief Medical Officer of Health and may make it publicly available. At this point in time, MLTSD has not made any further decisions on public disclosure of data.

32. If a Training Delivery Agent (TDA) is affiliated with another TDA, can they use the affiliated TDA's systems for COVID-19 requirements and reporting?

TDAs are encouraged to consult with their legal counsel as they work to develop and implement their policies in accordance with the OCMOH Instructions.