

School board implementation resource guide – updated

COVID-19 immunization disclosure policy for the education sector

Updated September 1, 2021

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 students and/or staff, for the 2021-22 school year. Regular rapid antigen testing requirements will be in place for staff 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 schools through vaccination is part of a range of measures and actions that can help prevent and limit the spread of COVID-19 in schools and supports our goal of keeping schools open and safe for in-person learning.

The Chief Medical Officer of Health (CMOH) intends to issue instructions for the education sector that require all publicly-funded school boards to have a COVID-19 immunization disclosure policy in place.

For the purposes of this document, the term “policy” should be interpreted as “process”, “protocol”, “procedure” or any other term commonly used by the school board that have a similar meaning. The Ministry of Education is not requiring that a school board’s immunization disclosure policy receives approval from the Board of Trustees or Board Chair.

The objectives of this policy are to:

- Support safer schools for Ontario’s students and staff;
- Set out a provincially consistent approach to COVID-19 immunization disclosure policies in schools;
- Optimize COVID-19 vaccination rates in schools;

- Ensure that individuals have access to reliable information to support 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 Ministry of Education is committed to providing detailed guidance to school boards to assist with implementation. To ensure school boards receive timely information, the issuance of ministry guidance will be iterative, and will include new information as it emerges. Where there are differences in guidance, the most recent document should be used as the authoritative source.

The ministry is committed to working collaboratively with its school board and education partners and will continue to provide its support to help employers understand the government's policy intent and requirements, and support implementation planning.

Purpose and use

The purpose of this resource guide¹ is to support school boards in implementing their immunization disclosure policy. This guide also includes:

- Appendix A: sample school board immunization disclosure policy template
- Appendix B: additional resources to support a school board's educational program
- Appendix C: frequently asked questions (FAQs)
- Appendix D: 2021-22 COVID-19 vaccination attestation summary – updated

This document will be updated with further guidance shortly, on key areas such as:

- Rapid antigen testing requirements; and
- COVID-19 educational program.

Key dates

- **By September 7, 2021:** Individuals covered by the policy are expected to submit a formal attestation if they are “fully vaccinated” against COVID-19.
- **By September 10, 2021:** School boards are expected to share aggregated, depersonalized statistical information regarding attestations with the ministry using a template issued by the ministry (see pages 8 and 9).

1. The application and use of this document are the responsibility of the user. The Ministry of Education assumes no liability resulting from any such application or use. This document is not intended as a substitute for any applicable legislation, directives, or orders and does not constitute legal advice. In the event of any conflict between this document and any legislation, directive, or order, the legislation, directive, or order prevails. Additionally, this document is not intended to take the place of medical advice, diagnosis, or treatment.

- **By September 15, 2021:** School boards are expected to publicly post the aggregated, depersonalized statistical information and continue doing so on a monthly basis.
- **By September 24, 2021:** School boards are expected to share updated aggregated, depersonalized statistical information with the ministry.

School board's immunization disclosure policy

Individuals subject to a school board'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 program** prescribed by the Ministry of Education.

Those who are not fully vaccinated² 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:

- All school board employees/staff, including daily and long-term occasional teachers and casual education workers;
- School board trustees;
- Student transportation drivers; and

The following individuals if attending the school premises frequently and have direct contact with staff or students:

- Students on educational placement, including professional services students on a placement / work-integrated learning visit (e.g., teacher candidate practicums, nurse, psychologist, behavioural therapist, speech-language pathologist, etc.);
- Volunteers;
- Those who provide professional services to children at school; and
- Visitors, including third-party contractors.

2. "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.

Based on these parameters, school boards are asked to determine the total number of individuals subject to the school board's policy. School boards are also asked, in their reporting to the ministry, to be explicit on categories of individuals captured, including any deviations from the above list. Based on feedback from school boards, the statistical information for the individuals covered by the policy will be reported in two categories: (1) school board employees and trustees; and (2) other individuals, per the categories above.

Individuals not directly employed by school boards

The ministry recognizes that some individuals covered by the policy are employed by, volunteer at, or provide services to multiple school boards. In most cases, individuals will be expected to provide separate attestations to each school board. In the case of student transportation drivers, school boards are encouraged to work with their respective transportation consortia to implement the policy and data collection processes.

Attestation requirements

By September 7, 2021, individuals covered by the policy are expected to submit a formal attestation if they are "fully vaccinated" against COVID-19 and provide proof of full vaccination (i.e. upload or provide vaccination receipt(s)). This attestation process is envisioned to take approximately 15 minutes.

As many school boards are exploring how their existing human resources information systems (HRIS) can accommodate this attestation process, including the potential to upload vaccine receipts as proof, school boards can accept attestations for the target date of September 7, 2021, with proof to follow. The ministry asks that school boards continue to work towards uploading vaccine receipts or otherwise confirming proof of vaccination as quickly as possible.

This approach aims to balance the need for school boards to have some lead time to undertake implementation activities, with the need to have the policy in place as soon as possible to protect school populations.

Individuals who are not fully vaccinated by the start of school can submit their attestation throughout the school year as soon as they meet the definition of "fully vaccinated" outlined above. It is expected that newly hired or retained individuals would provide an attestation where applicable on or before the first day of attending a school board site, where possible.

Attestation collection guidance

It is recommended that school boards consider the use of a secure electronic system or tool to collect attestation information from staff and other individuals to whom this policy applies. If a school board is unable to, or prefers to use an alternate means of collection,

it may do so. School boards are encouraged to obtain their own privacy advice to ensure they are in compliance with their privacy obligations under applicable legislation.

The following language may be considered as part of a school board's 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.

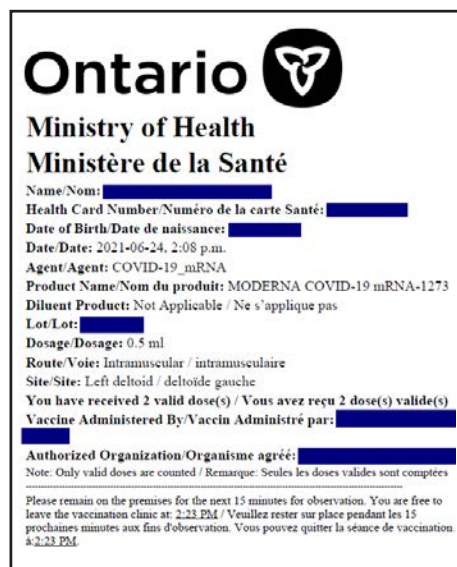
In this attestation, "fully vaccinated against COVID-19" means having received all of the doses required for a COVID-19 vaccine(s) approved by the World Health Organization (e.g., two doses of a two-dose vaccine, or one dose of a single-dose vaccine); and having received the final vaccine dose at least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


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.

Providing proof

Proof of vaccination

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



Ontario 

Ministry of Health
Ministère de la Santé

Name/Nom: [REDACTED]
Health Card Number/Numéro de la carte Santé: [REDACTED]
Date of Birth/Date de naissance: [REDACTED]
Date/Date: 2021-06-24, 2:08 p.m.
Agent/Agent: COVID-19_mRNA
Product Name/Nom du produit: MODERNA COVID-19 mRNA-1273
Diluent Product: Not Applicable / Ne s'applique pas
Lot/Lot: [REDACTED]
Dosage/Dosage: 0.5 ml
Route/Voie: Intramuscular / intramusculaire
Site/Site: Left deltoid / deltoïde gauche
You have received 2 valid dose(s) / Vous avez reçu 2 dose(s) valide(s)
Vaccine Administered By/Vaccin Administré par: [REDACTED]
Authorized Organization/Organisme agréé: [REDACTED]

Note: Only valid doses are counted / Remarque: Seules les doses valides sont comptées

Please remain on the premises for the next 15 minutes for observation. You are free to leave the vaccination clinic at: 2:23 PM / Veuillez rester sur place pendant les 15 prochaines minutes aux fins d'observation. Vous pouvez quitter la séance de vaccination à 2:23 PM.

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 vaccines³

To log in to **the provincial portal** and download vaccine receipt(s), individuals will need the following:

- A **green photo health (OHIP) card** (you will need numbers from both the front and back of the card, expired cards will be accepted)
- Date of birth
- Postal code

Steps to download receipts:

- 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.

If you have a **red and white health card** or are having difficulty accessing your vaccine receipt(s) online, call the Provincial Vaccine Booking Line at 1-833-943-3900. A call centre agent can email you a copy of your 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 majority of individuals 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 or upload a digital copy of their vaccine receipt. The Ministry of Education encourages school boards 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*).

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

In some instances, the medical reason for a person not being vaccinated may be time-limited (e.g., timing around a procedure or other medical treatment). The documentation from the physician/nurse practitioner must specify whether the reason is permanent or time-limited. If time-limited, the documentation should indicate how long the medical reason is expected to last. School boards 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 school board 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 program prescribed by the Ministry of Education.

Proof of completion of an educational program

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, outside of working hours.

School boards are required to use a video resource that is prescribed by the Ministry of Education as the education program for unvaccinated individuals. The ministry is targeting to share the video resource with school boards by September 10, 2021.

Additional resources are included in **Appendix B** for informational purposes only.

School boards are encouraged to plan a way for individuals to provide proof that they have completed the educational program, where required. Options could include having the person sign a form digitally or in-person saying that they completed the educational program (i.e. an attestation).

Testing requirements

School boards must require individuals who are not fully vaccinated to complete regular rapid antigen testing for COVID-19 at a minimum frequency prescribed by the Ministry of Education. Individuals will be expected to fulfill testing requirements outside of working hours.

For individuals who are covered by a school board's immunization disclosure policy but are less frequently in direct contact with students or staff, frequent testing may not be possible or reasonable. In these cases, the individual must complete a rapid antigen test as part of screening and demonstrate a negative test result, prior to interacting with students or staff.

More information on testing frequency, and the process for obtaining and reporting rapid antigen test results will be provided shortly.

Communicating about the requirements

School boards are expected to communicate the content and requirements of the immunization disclosure policy, and make it available to everyone who is subject to it and to parents/guardians.

While school boards should continue to encourage vaccination, 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 students and staff, which supports learning, development, and health and well-being.
- High rates of vaccination in schools are important to protect all staff and children who attend school and to help reduce the risk of outbreaks and the need for isolation or school closures.
- 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.

Statistical information and reporting

As announced on August 17, 2021, all school boards must collect, maintain, and disclose key data metrics that relate to this policy to the Ministry of Education on a monthly basis for the 2021-22 school year. As school boards implement this policy, there will be two data collections throughout the month of September:

- September 10, 2021: First data disclosure with the Ministry of Education
- September 24, 2021: Second data disclosure with the Ministry of Education

School boards will need to provide the following information. This list has been updated based on consultation feedback from school boards:

1. Total number of individuals to which this policy applies;
2. Total number of individuals who have attested to/and provided proof of being fully vaccinated against COVID-19;
3. Total number of individuals who have attested to being fully vaccinated, without supporting documentation;
4. Total number of individuals who provided a documented medical reason for not being fully vaccinated against COVID-19;

5. Total number of individuals who completed an educational session about the benefits of COVID-19 vaccination as an alternative to 2, 3, or 4 above, where applicable;
6. Total number of individuals who have not yet submitted the attestation, for all individuals in a school board's HRIS;
7. Percentage of individuals who have attested to being fully immunized (with supporting documentation); and
8. Percentage of individuals who have attested to being fully immunized (without supporting documentation).

School boards are also asked, in their reporting to the ministry, to be explicit on categories of individuals captured, including any deviations from the above list.

School boards will also be required to publicly post aggregated, depersonalized board-level data on a monthly basis.

School boards must not provide any identifying information to the ministry and should communicate to all individuals who are subject to the school board's policy that information will be shared with the ministry in aggregate form.

The summarized attestation information must be populated in an Excel template provided by the ministry. Based on feedback from school boards, the Ministry of Education has adapted its reporting template to allow boards to report this information separately for staff and trustees, and for other individuals frequently in school settings and in direct contact with students or staff.

Please see Appendix D for the final Excel template to be used. The template should be submitted to the following email address: vaccinationattestation.edu@ontario.ca using the following naming convention: **VaccinationAttestation_School Board Name.xls**.

If you have any questions regarding the Excel template, please submit them to vaccinationattestation.edu@ontario.ca.

Appendix A: Sample school board immunization disclosure policy

ABC school board's COVID-19 immunization disclosure policy

Purpose

The purpose of this document is to outline “ABC School Board’s” expectations with regards to COVID-19 immunization disclosure of staff, volunteers, third-party contractors, student practitioners, frequent visitors and other professionals who provide in-person services in schools and who have direct contact with staff and/or students (“The Covered Individuals”).

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

Background

The “ABC School Board” recognizes the importance of immunization as a key element to help keep school settings safe. This COVID-19 immunization disclosure policy aims to protect the school board’s population.

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

This immunization disclosure policy applies to the following groups, except where the individual works remotely and the individual’s work does not involve in-person interactions:

- All school board employees/staff, including daily and long-term occasional teachers and casual education workers;

- School board trustees;
- Student transportation drivers; and

The following individuals if attending the school premises frequently and have direct contact with staff or students:

- Students on educational placement, including professional services students on a placement/work-integrated learning visit (e.g., teacher candidate practicums, nurse, psychologist, behavioural therapist, speech-language pathologist, etc.);
- Volunteers;
- Those who provide professional services to children at school; and
- Visitors, including third-party contractors.

Policy

The CMOH has directed *ABC School Board* to develop, implement and ensure compliance with a COVID-19 immunization disclosure policy. This policy requires all individuals covered by the policy to 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 the educational program prescribed by the Ministry of Education.

Educational program

The educational program has been prescribed by the Ministry of Education and addresses 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 (if applicable)

“ABC School Board” will provide the following supports for individuals subject to this policy to receive a vaccine: _____.

Non-compliance with the policy (If applicable, the Ministry of Education recommends that school boards consult with legal counsel regarding potential non-compliance with the policy)

In accordance with “ABC School Board’s” policies, directives and collective agreements, as well as applicable legislation _____.

Testing requirements

Individuals subject to the policy who are not fully vaccinated must regularly complete rapid antigen testing for COVID-19 and demonstrate a negative result, at a minimum interval of ____ weekly; and provide verification of the negative test result (insert details on acceptable documentation).

Confidentiality statement

“ABC School Board” is required, pursuant to the Chief Medical Officer of Health’s direction, to report statistical information to the Ministry of Education. All statistical information will be provided in depersonalized aggregate form on a monthly basis.

Disclaimer:

This document is an example of an immunization disclosure policy. It is intended for illustrative purposes only. It is the responsibility of the school board to ensure that the information included in its policy meets all requirements under the CMOH’s Letter of Instruction and applicable legislation.

Please be advised that this example of a policy **does not constitute legal advice** and should not be relied on as such. It is the responsibility of the school board to ensure compliance with all applicable legislation and regulations. If the school board requires assistance with respect to the interpretation of the legislation and regulations and their application, the school board may wish to consult legal counsel.

Appendix B:

Supplementary educational resources

The Ministry of Education is providing a mandatory video for all individuals who must participate in an education session. Additional, supplementary resources are offered below for more information:

[About COVID-19 Vaccines](#) (Ontario Ministry of Health)

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

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

[Coronavirus disease \(COVID-19\): Awareness resources](#) (Government of Canada – available in many languages)

[COVID-19 Info](#) (Immunize 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)

[COVID-19 Vaccines Explained](#) (World Health Organization)

[COVID-19 Vaccine Information Sheet](#) (Ontario Ministry of Health)

[COVID-19: Vaccine Resources](#) and in [American Sign Language](#) (City of Toronto – available in many languages)

Documents multilingues sur la vaccination contre la COVID-19 (Alliance des communautés culturelles pour l'égalité dans la santé et les services sociaux – available in many languages)

Gashkiwidoon toolkit: covid-19 vaccine implementation (Indigenous Primary Health Care Council)

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

Sunnybrook COVID-19 e-learning module (Sunnybrook Health Sciences Centre)

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

Disclaimer:

The Ministry of Education and the Province of Ontario do not assume any responsibility for the content of any of the supplementary resources listed above. The inclusion of the supplementary resources in the list above does not constitute an endorsement of the resource or the organization/entity that developed the resource. School boards should seek legal advice on the use of any resources/materials whose use is protected by law. If a school board wishes to use any or all of the resources in the list above as a supplement to the mandatory video resource to be provided by the ministry, the school board should clearly and expressly attribute sources appropriately.

Appendix C:

Frequently asked questions (FAQs)

1. What are the requirements in the immunization disclosure policy?

As announced on August 17, 2021, the Chief Medical Officer of Health (CMOH) is requiring school boards to establish and implement a COVID-19 immunization disclosure policy for staff, and other individuals who have frequent and direct contact with school board staff or students in schools and/or during student transportation. Individuals subject to a school board's immunization disclosure policy would 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 program** prescribed by the Ministry of Education.

Individuals who are not fully vaccinated, including those with a documented medical reason, will be required to complete COVID-19 rapid antigen testing at a minimum frequency prescribed by the Ministry of Education. More information on testing and frequency will be available shortly.

2. Why did the CMOH issue instructions that require school boards to have an immunization disclosure policy?

Achieving high immunization rates in Ontario's schools through vaccination is part of a range of measures and actions that can help prevent and limit the spread of COVID-19 in schools. Vaccination against COVID-19 helps reduce the number of new cases with the overarching goal of keeping schools open and safe for in-person learning.

The objectives of this policy are to:

- Support safer schools for Ontario's students and staff;
- Set out a provincially consistent approach to COVID-19 immunization disclosure policies in schools;
- Optimize COVID-19 vaccination rates in schools;

- Ensure that individuals have access to reliable information to support 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.

3. When are these requirements taking effect?

By September 7, 2021, individuals covered by the policy are expected to submit a formal attestation if they are “fully vaccinated” against COVID-19 and provide proof of full vaccination (i.e., upload or provide vaccination receipt(s)). This attestation process is envisioned to take approximately 15 minutes.

As many school boards are exploring how their existing human resources information systems (HRIS) can accommodate this attestation process, including the potential to upload vaccine receipts as proof, school boards can accept attestations for the target date of September 7, 2021, with proof to follow. The ministry asks that school boards continue to work towards uploading vaccine receipts or otherwise confirming proof of vaccination as quickly as possible.

This approach aims to balance the need for school boards to have some lead time to undertake implementation activities, with the need to have the policy in place as soon as possible to protect schools’ populations.

Implementation timeline requirements for other elements of the policy (e.g. testing) will be communicated shortly.

4. Who is responsible for ensuring that the covered individuals are notified of a school board’s COVID-19 immunization disclosure policy?

Every school board shall ensure that the policy on COVID-19 immunization disclosure is available to all individuals who are subject to the policy, and that the policy is made available to parents and guardians.

While school boards should continue to encourage all individuals who work in or otherwise attend schools 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 type of data are school boards required to report to the ministry regarding their COVID-19 immunization disclosure policies?

Every school board must collect, maintain, and disclose to the Ministry of Education, on a monthly basis and in a manner set out by the ministry, the following statistical information:

1. Total number of individuals to which this policy will apply;
2. Total number of individuals who have attested to being fully vaccinated, without supporting documentation;

3. Total number of individuals who have attested to/and provided proof of being fully vaccinated against COVID-19;
4. Total number of individuals who provided a documented medical reason for not being fully vaccinated against COVID-19;
5. Total number of individuals who completed an educational session about the benefits of COVID-19 vaccination as an alternative to 2, 3, or 4 above, where applicable;
6. Total number of individuals who have not yet submitted the attestation, for all individuals in a school board's HRIS;
7. Percentage of individuals who have attested to being fully immunized (without supporting documentation); and
8. Percentage of individuals who have attested to being fully immunized (with supporting documentation).

School boards are also asked, in their reporting to the ministry, to be explicit on categories of individuals captured, including any deviations from the above list.

6. My school board has volunteers that only come into schools for two hours once a week; would they be subject to the school board's COVID-19 immunization disclosure policy?

A school board's COVID-19 immunization disclosure policy must apply to all staff, and other individuals who have frequent and direct contact with school board staff or students in schools and/or during student transportation, including volunteers.

7. Do individuals who are on leave from work (e.g., pregnancy/parental leave, sick leave, extended personal leave, etc.) or work remotely have to comply with a school board's immunization disclosure policy?

The CMOH's instructions will exclude individuals who work remotely and whose work does not involve in-person interactions. Individuals who are on a leave from work and are not attending school settings or in direct contact with staff or students are not subject to this policy.

8. How much time do newly hired/retained individuals have to come into compliance with a school board's immunization disclosure policy?

It is expected that newly hired or retained individuals would provide an attestation where applicable on or before the first day of attending a school board site, where possible.

9. When will individuals be expected to test or watch the required educational video?

Individuals will be expected to fulfill testing requirements and/or watch the ministry prescribed education video outside of working hours.

10. What happens if someone has had their first dose of a two dose vaccine series but does not provide proof of a second dose?

If a person subject to the school board's COVID-19 immunization disclosure policy does not provide proof of having received all of the required doses of a World Health Organization approved vaccine, they will be required to provide a medical reason for not receiving the second dose or participate in an educational program and continue to complete regular COVID-19 testing as prescribed by the ministry.

11. How will school boards have access to the educational program?

School boards are required to use a video resource prescribed by the Ministry of Education as the educational program for unvaccinated individuals. The ministry is targeting to share the video resource with school boards by September 10, 2021.

12. Do unvaccinated individuals need to complete the educational program more than once?

The CMOH's direction will not require completion of the educational program more than once.

13. 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 school board is required to ensure that the individual participates in an educational program prescribed by the Ministry of Education, and undergo regular rapid antigen testing at a minimum interval prescribed by the Ministry of Education.

As it stands, a medical exemption is the only reason an unvaccinated individual would not be required to participate in an educational 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 boards expected to collect or report this information.

14. What if an individual has a medical condition that prevents them from being vaccinated?

If an individual cannot be vaccinated due to a medical reason, the school board must ensure that the individual produces written proof of the 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 the medical reason 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., six months, one year, etc.). The person will need to undergo regular rapid antigen testing at a minimum interval prescribed by the Ministry of Education.

15. What happens if an individual has a time-limited medical reason for not being vaccinated?

If an individual is unable to receive their vaccine for a medical reason but that reason is valid for a limited time, the school board 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 program prescribed by the Ministry of Education.

16. What is acceptable proof of vaccination?

For individuals who were vaccinated in Ontario, the only acceptable proof of vaccination is presenting the physical or electronic receipt provided by the Ministry of Health. Individuals who misplace their receipt can obtain a replacement copy by logging into the provincial vaccine portal or calling the Provincial Vaccine Booking Line at 1-833-943-3900.

For individuals vaccinated outside of Ontario, the jurisdiction where the vaccine was administered will have issued some form of documentation. As of August 24, 2021, all receipts for World Health Organization approved vaccines are available online.

17. What is acceptable proof of having completed the educational program?

School boards are encouraged to plan for an approach for individuals to provide proof that they have completed the educational program. This could take the form of having the individual sign a form which says the person completed the educational program (i.e. an attestation).

18. How will testing be implemented for individuals who are not at the school premises every day?

For individuals who are covered by a school board's immunization disclosure policy but are less frequently present at the school premises/in direct contact with students or staff, frequent testing may not be possible or reasonable. In these cases, the individual must complete a rapid antigen test as part of screening and demonstrate a negative test result, prior to interacting with students or staff.

19. Are school boards required to accommodate employees based on their vaccination status?

If a request for accommodation is made based on an individual's vaccination status, then school boards are advised to follow existing policies and procedures and work with the individual employee's union representative on an accommodation plan, if applicable. School boards may also wish to seek legal counsel to establish whether a duty to accommodate exists.