

CIRCULAR

Date: October 21, 2021

CIRCULAR NUMBER: COVID-19 2021-55

To: Home-Based Early Learning and Child Care (ELCC) Facilities

Subject: Verification of Immunization Status and Rapid Testing of Non-Vaccinated Licensees, Volunteers and Staff

Type: Policy

Procedure

Effective Date: **Immediately**

As you know, the public health [Orders Requiring Vaccination or Testing for Designated Persons](#) came into effect on October 18, 2021. The orders require designated individuals working with vulnerable populations to be regularly tested for COVID-19 and provide proof of a negative test result before they can resume working, unless they provide proof of immunization.

Please be aware that all licensed family and group child care homes, are required to be in compliance with this public health order.

The information in this circular is intended to assist licensed home-based ELCC providers in their efforts to comply with the public health order.

The ELCC Program is the administrator for home-based facilities under this public health order and is required to verify proof of immunization and of regular testing (when applicable) for all designated individuals in child care homes.

For licensed family and group child care homes, this public health order applies to the following designated individuals:

- licensee(s)
- visitors/volunteers who are eligible for COVID-19 vaccination, this includes
 - all residents in the home who have direct and ongoing or prolonged contact with the children attending the child care home including resident children between 12 and 17 years of age
- staff, including paid or unpaid substitutes
- practicum students
- contractors who have direct and ongoing or prolonged contact with the children

If there is any doubt regarding whether the testing requirement applies, the test of “direct and ongoing or prolonged contact” with the children who attend the child care home must guide practice. Considerations include:

- Will the person have close contact with the children (within two metres and for more than 10 minutes total over 24 hours)?
- Will the person come into direct contact with the children? Will they come into contact with the children’s environments (eating or play spaces, vehicle, or another enclosed space) or children’s equipment?
- Is the person in attendance one-time only or rarely (less than twice per month), or will they be in attendance on an ongoing basis?
- Is the person in a role where there is no direct contact or only brief contact with the children?

Verification of Immunization

Child Care Coordinators will be contacting home-based facilities to obtain proof of the immunization status for the licensee(s). In addition, the Child Care Coordinators will be obtaining the names and immunization status of any other designated individuals who have direct and ongoing or prolonged contact with the children who attend the child care home.

The ELCC Program has put safeguards in place to store immunization status information in a safe and secure manner, as per [The Personal Health Information Act](#) and will not keep copies of the proof of vaccination, nor copies of photo identification presented for the purpose of verifying immunization status of designated individuals in child care homes.

Child Care Coordinators must see proof of full immunization over live video using one of the various platforms that are available (for example, video phone call, Teams, Zoom, FaceTime, etc.) or in-person.

Acceptable forms of proof of immunization include:

- Manitoba Immunization Card (physical or digital)
- a printed Manitoba immunization record from either public health or the [Shared Health online portal](#) that shows immunization dates
- National Defence Canada Covid-19 Vaccine Record/Card
- Canadian Public Health Association (CPHA) Travel Vaccination Record an official document issued by a Canadian province or territory containing
- information of a person’s COVID-19 vaccination history ([Provincial Immunization Record Samples](#) are available online)

Child Care Coordinators have the discretion to request photo identification, if they do not know the designated individual and may choose to verify using the [Manitoba Immunization Verifier Application](#).

Designated individuals in child care homes who provide proof that they are fully immunized are exempt from mandatory COVID-19 testing. For further information, see

COVID-19 2021-51 Collecting Employee Immunization Information & Preparations for Required Testing – Service Providers.

Testing Requirements

Designated individuals who are not immunized, only partially immunized, or who choose not to provide proof of immunization are required to begin testing no later than October 18, 2021. Designated individuals in child care homes who become fully immunized after that time may stop testing once proof of their vaccination status has been provided to the ELCC Program.

Individuals should space out their testing frequency taking into account that negative test results are valid for 48 hours. They must not attend or remain at the child care home unless less than 48 hours have passed since they were last tested for COVID-19.

As the results of a negative COVID-19 test are considered valid for 48 hours from the time the swab is performed, testing is required up to three times per week. For example:

- In a child care home that operates from Monday to Friday, the licensee and any other designated individuals who are present on a daily basis would be required to take a test prior to the hours of operation on Monday, Wednesday and Friday.
- If a designated individual is only present on Tuesday and Friday, they would be required to take a test prior to the hours of operation on Tuesday and Friday (2 tests per week).
- Home-based providers and other designated individuals are encouraged to conduct testing in the evening to provide adequate notice to families if child care cannot be provided the following day due to a positive test result.

Licensed home-based providers must report the results of the COVID-19 tests for themselves and/or all other designated individuals on the Friday of each week that testing is required.

A separate Attestation/Declaration Form for Home-Based ELCC Facilities (attached) must be completed for each designated individual requiring testing.

- When submitting on behalf of another individual, the attestee completes the information and signs PART A: LEGAL ATTESTATION/DECLARATION) and the home-based provider (licensee) must sign PART B. CONFIRMATION OF LEGAL ATTESTATION/DECLARATION.
- When submitting for themselves, the home-based provider (licensee) must complete and sign PART A: LEGAL ATTESTATION/DECLARATION.
- The completed Attestation/Declaration Form(s) must be submitted to elcc.reporting@gov.mb.ca and the facility's Child Care Coordinator with "Attestation/Declaration Form: Facility Name and Facility Number" in the subject line.

Completing and signing the Attestation/Declaration Form provides official verification that the licensee and other designated individuals have complied with the testing requirements and accurately reported the results.

If an individual receives a positive test result, they will need to isolate from others and go to a provincial test site to receive a confirmatory test.

- Home-based providers must immediately notify their Child Care Coordinator by phone if the licensee receives a positive test result and the home needs to close.
- In addition, the home-based provider must submit a COVID-19 Incident Reporting Form to cdcinfo@gov.mb.ca with “COVID-19 Incident Reporting: Facility Name and Facility Number” in the subject line.

For further information, see [COVID-19 2021-52 Rapid Testing of Non-Vaccinated Staff – Service Providers](#).

As with all of the health orders related to COVID-19, this order is enforceable. Should the [COVID Tip Line](#) receive a report that an ELCC facility is not in compliance with the requirement for [designated persons](#) to be fully immunized or participate in regular testing, enforcement officers will investigate.

As a reminder, all licensed family and group child care homes are also required to comply with Section 3(1) of The Community Child Care Standards Act, to ensure a safe and healthy environment for the well-being of children in their care. Compliance with the public health order helps to ensure a safe and healthy environment.

Thank you to the many facilities that have worked to ensure that they are in full compliance with the public health order requiring vaccination or ongoing testing. We know that facilities continue to deal with a myriad of pandemic-related challenges, and appreciate your ongoing efforts to prevent the spread of COVID-19 while maintaining a quality program for the children in your care.

Once again, thank you for your commitment to the health and well-being of children, their families, and the wider community.

Early Learning and Child Care Program

Appendix A: Attestation-Declaration Form for Home-Based ELCC Facilities