

Ministry of Health

COVID-19 Guidance: Considerations for Employer Rapid Antigen Screening Pilot

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This document is intended for individuals or organizations that choose to participate in the employer rapid antigen screening pilot in Ontario.

Testing does not prevent someone from getting COVID-19.

Testing conducted through this pilot program can be thought of as one additional screening tool.

Testing conducted through this pilot program does not replace public health measures: such as symptom screening, physical distancing, masking and hand hygiene.

Testing also does not replace requirements to protect the health and safety of workers.

Please see the [COVID-19 Provincial Testing Guidance](#) for more information. Anyone who falls within the current Provincial Testing Guidance should continue to seek publicly funded testing, available at participating pharmacies and assessment centres.

However, in recognition that some organizations may choose to participate in the provincial rapid antigen screening pilot, this document has been developed to outline the minimum public health considerations and requirements for such initiatives.

This guidance provides basic information only. It is not intended to take the place of medical advice, diagnosis, treatment, or legal advice. **Further, organizations that participate in this pilot assume any operational, medical, and/or legal responsibilities relating to this initiative.**

In the event of any conflict between this guidance document and any applicable legislation or orders or directives issued by the Minister of Health or the Chief Medical Officer of Health (CMOH), the legislation, order or directive prevails. Please see [Ontario's COVID-19 website](#) for more general information as well as for updates to this document.

Preamble

- Currently, COVID-19 clinical testing in Ontario is primarily conducted through the provincial public health care system.
- The province is now in the position to offer an 8-week rapid antigen screening pilot program for employers. This pilot program is an important opportunity for the government to gain knowledge about the value of antigen screening for asymptomatic workers in a range of workplace settings; while also increasing the range of COVID-19 supports available to workplace settings.
- The rapid antigen screening pilot program is for asymptomatic individuals **only**, who have passed the initial standard screening conducted within the workplace.
- Organizations should consider the rationale for asymptomatic testing, and ensure attention is paid to the following:
 - The interpretation of test results and related consequences, including following up on positive results as well as managing potential false positive and false negative results.
 - In the absence of known COVID-19 cases, there is a greater likelihood of false positive results.
 - False negative results may lead to parties undertaking inappropriately lax prevention methods, resulting in increased potential for COVID-19 transmission.
 - Positive results may result in psychological distress and stigmatization, while negative results may result in false reassurance.
 - The organization's personnel, facility, and operational capacity for administration of the tests and disposal of biohazardous material.
- This is a time limited pilot and outreach is being conducted by partner Ontario government ministries.

- In general, individuals who have previously been infected with and recovered from COVID-19 should not undergo repeat testing, unless otherwise directed by [local public health](#) or their health care provider as per their symptom and exposure history.
- As per [COVID-19 Provincial Testing Guidance](#), repeat testing is not required or recommended for clearance of individuals previously infected with COVID-19 including for return to work.
- Organizations should develop a [COVID-19 Workplace Safety Plan](#) to minimize the risk of COVID-19. This includes having written policies and procedures that are in alignment with any sector specific [guidance](#) issued by the Chief Medical Officer of Health and any other specific measures recommended by public health agencies. See [Resources to Prevent COVID-19 in the Workplace](#) for more information.
- Employers are also required to follow the [Occupational Health and Safety Act \(OHSA\)](#).
 - All workplace parties (e.g. employers, supervisors, workers) have statutory responsibilities related to [health and safety](#) in the workplace.
 - There are no specific requirements in the [OHSA](#) or its regulations for employers to conduct testing of workers.

Testing Requirements

- Prior to initiating testing, organizations must contact their [local public health unit](#) to make them aware that they will be engaging in a rapid testing program.
- Rapid testing can only be performed using one of the types of tests currently available in Ontario and approved by Health Canada. The rapid antigen screening pilot program will be using the Abbott Panbio™ antigen screening test and the test kits will be provided to participating employers for free from the Government of Ontario.
- All rapid tests must be performed by a licensed specimen collection centre or a laboratory licensed under the [Laboratory and Specimen Collection Centre Licensing Act \(LSCCLA\)](#) or by certain regulated health professionals that are specifically exempt from the licensing requirements of the [LSCCLA](#).
- A positive result on a rapid test is considered a preliminary positive and should be followed up with a laboratory-PCR test to act as a confirmatory test, as per [Provincial Testing Guidance](#).
 - Health care professionals must ensure that all personal and health

- information will be collected, used, disclosed in accordance with relevant legislation, including the [Personal Health Information Protection Act \(PHIPA\)](#).
- Health care professionals are responsible for satisfying all applicable legislative and regulatory requirements, including those under the [Laboratory and Specimen Collection Centre Licensing Act \(LSCCLA\)](#), [Health Protection and Promotion Act \(HPPA\)](#), [PHIPA](#), [Health Care Consent Act \(HCCA\)](#), [Regulated Health Professions Act \(RHPA\)](#).
 - Organizations should have a systematic procedure in place to provide follow up on test results.
 - Organizations should have plans in place to respond should any individuals be exposed to or diagnosed with COVID-19.
 - All test results must be uploaded into the Ontario Laboratory Information System (OLIS) if performed by a licensed laboratory.
 - Rapid testing in the employer screening pilot is to be used for screening purposes only and should only be used for low-risk asymptomatic individuals who are not a contact of a confirmed case of COVID-19. Any individual who is symptomatic or a contact of a confirmed cases should be directed to their healthcare provider or to an assessment centre. All preliminary positive COVID-19 tests performed must be reported to the local public health unit in accordance with [Regulation 682](#) made under the [LSCCLA](#) and the [HPPA](#).

The ministry of health will be following up with participating employers to ensure that the requirements set out in this guidance document can be met for the purpose of this 8-week pilot program.

Organizational Responsibilities Relating to Rapid COVID-19 Testing

Organizations that are interested in participating in the rapid antigen screening pilot program are also responsible for:

- Retaining existing public health measures such as symptom screening, appropriate distancing, using personal protective equipment and hand-washing activities. Rapid antigen screening is not a replacement for any of these measures.
- Follow all public health guidance for handling a presumptive positive case and

- require that the employee receive a laboratory PCR test within 24 hours.
- Seeking independent legal advice on issues of human rights, labour and employment law, privacy, and occupational health and safety before implementing a testing program, and developing a company policy related to COVID-19 testing based on this advice.
 - Seeking independent legal advice to ensure that all personal and health information of their workers will be collected, used, disclosed in accordance with all applicable legislation.
 - Planning, developing, and operationalizing policies and procedures related to testing.
 - All costs related to any testing initiated and pilot participation (except for the Panbio™ antigen screening test, which will be provided for free from the Government of Ontario), including but not limited to infrastructure, overhead, personal protective equipment and laboratory fees.
 - Cooperating with their local public health unit in the event of a potential workplace exposure of COVID-19 or an outbreak investigation.
 - Reporting quantitative and qualitative data to support the evaluation of the pilot.