

RHRA Recommendation for Asymptomatic COVID-19 Screen Testing for Retirement Homes

Effective July 16, 2021, it is recommended that retirement homes have a policy on a routine asymptomatic screen test¹ program that takes into account the risks and benefits of voluntary, routine, asymptomatic testing and aligns with their resources and needs, as determined by licensees. In developing their policies, retirement homes should consider the following recommendations. These recommendations replace those outlined in the [joint memo](#) and [FAQs](#) issued by the Ministry for Seniors and Accessibility and Ontario Health on June 9, 2020.

Application of the Policy

Retirement homes should limit their asymptomatic screen testing policies to asymptomatic staff² that have not been fully immunized.³ Home and Community Care Support Services providers, and personal care service providers that have not been fully immunized should also participate in screen testing.

In co-located long-term care and retirement homes that are not physically and operationally independent, the policies for the long-term care home and the retirement home should align with the more restrictive testing requirements, unless otherwise advised by the local Public Health Unit based on their instructions for COVID-19 testing, prevention and containment. Operationally and physically independent means that there are separate entrances and no mixing of residents or staff between the retirement home and long-term care home.

Requirements for long-term care homes are outlined in [the Minister's Directive issued by the Minister of Long-Term Care](#).

For retirement homes that are physically and operationally independent from long-term care homes, asymptomatic screen testing is not recommended for other essential visitors or general visitors, regardless of their immunization status.

¹ Also known as surveillance or targeted testing, COVID-19 screen testing is the routine, serial testing of asymptomatic individuals outside of outbreak or known exposure settings to identify staff infectious with COVID-19.

² Under the *Retirement Homes Act, 2010*, retirement home staff includes every person who works or provides services at the home, as an employee of the licensee, pursuant to a contract or agreement with the licensee, or pursuant to a contract or agreement between the licensee and an employment agency or other third party. This may include front-line workers, management, food-service workers, service providers under contract with the retirement home (including temporary staff from employment agencies), basic aides and guest attendants.

³ A person is fully immunized against COVID-19 if they have received the full series of a COVID-19 vaccine or combination of COVID-19 vaccines approved by Health Canada (e.g., two doses of a two-dose vaccine series, or one dose of a single-dose vaccine series) and they received their final dose of the COVID-19 vaccine at least 14 days ago.

Evolving Public Health Guidance

It is recommended that retirement homes align their policies with Public Health Ontario and Ministry of Health guidance on [COVID-19 testing](#) and [rapid antigen screening](#). This should include:

- Asymptomatic screen test frequency that aligns with provincial guidance on antigen screening if used as the primary testing mode.
 - As of June 3, 2021, Ministry of Health guidance indicates rapid antigen point-of-care testing may be completed 2-3 times per week during steps 1 and 2 of Ontario's [Roadmap to Reopen](#), and 1-2 times per week during step 3 of Ontario's [Roadmap to Reopen](#).
 - As an alternative, laboratory-based polymerase chain reaction (PCR) testing can be completed by individuals in the targeted testing groups. Minimum PCR testing frequency of once every 14 days should be considered.
 - Retirement homes should consider the potential risks and benefits of routine asymptomatic screen testing, and the overall number of tests completed by individuals to establish both reasonable test maximums as well as allowances for individuals who cannot undergo frequent testing. This could include limiting screen testing to three tests per week of any kind.

- Responding to new evidence on risk for reinfection. As of May 26, Ministry of Health guidance indicates individuals who have previously been diagnosed with and cleared of COVID-19 infection may resume asymptomatic screen testing after 90 days from their COVID-19 infection (based on the date of their positive result).

- Responding to new evidence on vaccine efficacy and/or breakthrough. Current evidence from the Ontario's [COVID-19 Science Advisory Table](#) and recommendations from [the Provincial Infectious Diseases Advisory Committee](#) indicate that fully immunized individuals should be excluded from routine asymptomatic screen testing. The exclusion of fully immunized individuals has the added benefit of supporting provincial reopening by encouraging uptake among individuals who have not started or completed COVID-19 immunizations. Please note that fully immunized individuals should continue to be tested in the event of developing COVID-19 symptoms, following a high-risk exposure to a known COVID-19 case, and/or at the direction of local public health units.

Retirement homes are responsible for monitoring and updating their policies as this guidance evolves. The Retirement Homes Regulatory Authority will support awareness of changes when guidance is updated.

Communication

To ensure individuals impacted by screen testing policies are aware and informed of their responsibilities, retirement homes should post their asymptomatic screen testing policy on their website and in locations within the home that would be accessible by all visitors and residents, and regularly provide communications when there are updates to the policy.

Retirement homes should also provide their asymptomatic screen testing policy to Home and Community Care Support Services in their community and the contracted personal care service providers that provide care to residents in their home.

Alignment with Applicable Legislation

In developing and implementing their asymptomatic screen testing policies, retirement homes are reminded to ensure their policies align with their responsibilities under applicable legislation including:

- The [Retirement Homes Act, 2010](#) and any clarification provided by the Retirement Homes Regulatory Authority on how to achieve compliance with the act. This includes subsection 61(2) of the *Retirement Homes Act, 2010* which prohibits licensees from interfering with the provision of care services to a resident by an external care provider (only subject to the licensee's duty to protect residents from abuse and to prevent the use of restraints).
- Direction issued by the Chief Medical Officer of Health, including [Directive #3 for Long-Term Care Homes](#), as well as the [Retirement Homes Policy to Implement Directive #3](#). This includes:
 - Supporting the use of asymptomatic screen testing for screening purposes only. Routine, asymptomatic screen testing should not interfere with or impede testing as directed by public health guidance and/or the local Public Health Units. Currently, this means that retirement homes must ensure that symptomatic individuals, close contacts of positive cases, or individuals associated with an outbreak are directed to a healthcare provider, to an assessment centre, or a participating licensed community lab in order to seek a PCR test. Testing for homes in outbreak will continue to be managed by local Public Health Units.

- Reinforcing the continued adherence to protocols for infection prevention and control, physical distancing, personal protective equipment and hand hygiene and active COVID-19 screening.
- The *Personal Health Information Protection Act, 2004* with respect to consent to the collection, use, and disclosure of personal health information and record keeping in the event that retirement homes develop an asymptomatic screen testing policy that includes the collection of personal health information (e.g., test results, immunization status).

Retirement homes that have questions or concerns on how to meet these obligations are reminded to seek legal advice. Retirement homes should also consider any collective bargaining issues related to regular asymptomatic screen testing.

While the Ontario outlook is improving, COVID-19 related risks continue to vary at the local level. In developing and implementing their screen testing policies, retirement homes are also encouraged to consider their local environment and align their approaches with evolving advice or direction issued by their local public health unit.

Regardless of their asymptomatic screen testing policies or practices, retirement homes must also continue to follow protocols for infection prevention and control, physical distancing, personal protective equipment, and hand hygiene. Furthermore, retirement homes must continue active COVID-19 screening of all staff, volunteers, and essential visitors entering the home (with the exception of first responders) as per Directive #3 and the Policy to Implement Directive #3.

In the coming weeks and months, we will continue to monitor sectoral and provincial progress and determine if any additional steps are recommended.