Frequently Asked Questions

Letter of Instruction Requiring Proof of Vaccination for Coaches, Volunteers and Officials for Indoor Organized Sport
Updated: October 21, 2021

Ottawa Public Health Business Resources
- Visit our website: ottawapublichealth.ca/workplaceCOVID19
- Sign-up to receive newsletters from Ottawa Public Health
- COVID-19 Information Phone Line: 613-580-6744

Guidance Documents to Support Businesses and Organizations with Proof of Vaccination
- Proof of Vaccination Guidance for Businesses and Organizations under the Reopening Ontario Act.
- Proof of Vaccination Questions and Answers for Businesses and Organizations.

1. What is a Letter of Instruction (LOI)?
A Letter of Instruction is used to make additional requirements not set out in the Reopening Ontario Act (ROA). Requirements within the Letter of Instructions are considered mandatory and legally enforceable under the ROA.

2. What gives Ottawa Public Health the authority to mandate this in addition to what the Province has already implemented?
On August 24, 2021, amendments were made to both Step 3 and the Roadmap Exit Step in O.Reg 364/20, under the Reopening Ontario (A Flexible Response to COVID-19) Act (ROA), to require businesses or organizations to comply with any advice, recommendations and instructions related to COVID-19 vaccination policies that are issued by the Ontario Chief Medical Officer of Health or by a medical officer of health after consultation with the OCMOH.

The instructions specified within the Letter of Instruction are being provided pursuant to Section 2(2.1) of Schedule 1 to Ontario Regulation 364/20: Rules for Areas at Step 3 And At The Roadmap Exit made under the Reopening Ontario (A Flexible Response to COVID-19) Act, 2020, S.O. 2020, c. 17 (the “Reopening Ontario Act”), formerly a regulation made under the Emergency Management and Civil Protection Act and now a continued section 7.0.2 order under the Reopening Ontario Act.

3. Who requires vaccination under this Letter of Instruction?
Volunteers, Coaches and Officials who enter indoor facilities in the City of Ottawa where Organized Sports are played and/or practiced are required to provide proof of being fully vaccinated. These requirements are in addition to the regulations provided by the Province under the Reopening Ontario Act, 2020 and existing requirements for vaccination, as outlined in Proof of Vaccination Guidance for Businesses and Organizations under the Reopening Ontario Act.

4. How does this Letter of Instruction apply to full-time staff who are coaches, where the workplace does not mandate vaccines as a condition of employment?
The Letter of Instruction applies to all coaches of indoor Organized Sport – both volunteers and employees. Vaccination is the single most effective measure to prevent COVID-19. Key risk factors for COVID-19
transmission include close contact, closed spaces, crowded places, prolonged exposure, and forceful exhalation, all of which are prevalent with indoor organized sport activities.

This LOI is intended to mitigate these risks associated with indoor organized sports and to keep our youth participating safely.

5. Who is exempt from this Letter of Instruction?
   - Individuals aged 12-17 years who are actively participating in an organized sport in the indoor area of a facility. A facility means a facility located in the City of Ottawa where organized sports are played and/or practiced.
   - At this time, the LOI does not apply to school-related organized sports. Indoor organized sports associated with schools will continue to follow provincial school guidance, and the schools’ own internal policies.
   - It is strongly encouraged that anyone aged 12 and older is vaccinated against COVID-19 as soon as possible.

6. Why are youth under 18 participating in indoor Organized Sport not required to show proof of vaccination?
   The province of Ontario provided an exemption to vaccination requirements for youth under 18 years of age who are actively participating in organized sport. Locally, there has been high voluntary uptake of COVID-19 vaccination among youth 12-17 years old. This Letter of Instruction reduces risks to these participants by requiring the adults around these children to be vaccinated. OPH recommends that all eligible youth also get vaccinated.

7. Why is this being introduced in Ottawa?
   The new provincial proof of vaccination requirement has increased vaccination requirements in certain settings; however, there are exclusions within this policy for certain participants of indoor organized sports. These exclusions include volunteers, coaches and officials who are instrumental in the operation of organized sport. With the current exemption, participants are left vulnerable to COVID-19, as they are often youth and may be unvaccinated, and often not wearing a mask or maintaining physical distance when engaging in physical activity. Ottawa Public Health is one of several health units in Ontario to implement these Instructions to further protect our communities.

8. What is the evidence to support this additional requirement?
   Risk factors for COVID-19 transmission include close contact, closed spaces, crowded places, prolonged exposure, and forceful exhalation, all of which are prevalent with indoor organized sport activities. There have been several local examples of outbreaks in organized sport throughout the pandemic. Vaccination is the single most effective measure to prevent COVID-19.

9. Why is COVID testing not an alternative to vaccination in this setting?
   Rapid testing is considered an additional COVID-19 screening option and does not replace other required public health measures including vaccination, self-screening, staying home when ill, masking, physical distancing & hand hygiene.

10. When does this take effect?
    From October 9 through to October 23, inclusive, an educational approach will be taken to enforcing the requirements. Coaches, volunteers, and officials who wish to continue to support indoor organized sports in-person and are currently not fully vaccinated are strongly encouraged to take the steps necessary to become fully vaccinated. To book an appointment to receive the COVID-19 vaccine visit our website for more information about the COVID-19 vaccine.
11. Can an organization follow their own internal vaccination policy, rather than the LOI’s timeline for implementation?
Many organizations and businesses have created their own vaccination policy. While creating an internal vaccination policy is supported by OPH, owners and operators are reminded that their own policy can require more strict requirements than this LOI and Provincial Regulations but cannot require less.

12. Where does this Letter of Instruction apply?
The Letter of Instruction applies to facilities that are used for indoor Organized Sports activities. These facilities include gyms, recreation facilities, dance studios, gymnastics centres, dojos/martial arts studios, tennis clubs, pools, waterparks, and other indoor premises where sporting events are played or spectated or where Organized Sports activities occur.

13. How does this apply to outdoor sports, specifically for coaches and volunteers for outdoor sports?
The Instructions apply to indoor areas of the facility. This aligns with the requirement under the Regulation that patrons provide proof of vaccination at the point of entry to indoor areas of facilities used for sports and recreational fitness activities.

14. With the increased requirement of vaccination of Coaches, Volunteers and Officials, do we still need to follow all other public health measures?
Yes. All other public health measures related to screening, physical distancing, use of personal protective equipment, and maintaining a log with contact information of every member of the public who enters the facility, as outlines in O. Reg. 364/20. Physical distancing must be maintained when not actively engaged in play but when in the facility.

15. Who is going to enforce this check at the facility? (example: when someone rents the ice from the City to run pickup hockey)
Owner, operator, or person responsible of the recreation facility are required to implement the requirements within the LOI. Some of these responsibilities may be delegated to permit holders of the owners/operators depending on the situation for each facility. If there are complaints, they could call bylaw at 3-1-1.

16. How do operators, owners, and persons responsible for indoor facilities used for organized team sport in the City of Ottawa implement this?
Currently, the Provincial regulations require that all spectators and persons 12 years of age and older entering an indoor facility used for sports and recreation provide proof of vaccination, with some exceptions. This Letter of Instruction expands on who is required to show proof of vaccination. In order to implement the Letter of Instruction, organized sports operators and/or facility operators will need to work collaboratively to extend the proof of vaccination requirements that apply to patrons to apply also to coaches, volunteers, and officials involved with indoor Organized Sport and develop the required plan that describes the measures and procedures which have been implemented. The process to confirm proof of vaccination is detailed on the Provincial Proof of Covid-19 Vaccination webpage.

17. Does vaccination status need to be confirmed for each visit?
By-law and Regulatory Services has taken the approach that proof of vaccination at facilities with regular clients/members would be permitted to verify proof of vaccination one time and mark on the clients file that they have been fully vaccinated, with the date and name of the employee that confirmed the status, thus eliminating the need to verify vaccination status every visit. Facilities should only be keeping this information, and not records of vaccine receipts. Regular clients/members should still be prepared to show proof of vaccination if asked.

18. Is a self-attestation sufficient to confirm proof of vaccination?
No, you need to show proof of vaccination, as well as proof of identification.
19. What if a facility experiences concerns with patron compliance?
   • Individuals who have any trouble with patrons could, if the situation permits, inform the patron of the requirements of the LOI under O. Reg. 364/20 and advise that they are unable to enter the premise without proof of full vaccination or medical exemption and identification.
   • Should an individual persist entry without meeting requirements, or if a situation escalates, law enforcement, such as local police, can be contacted. In an emergency, if a situation becomes unsafe, call 9-1-1.
   • All Provincial offences officers, including by-law, police, public health inspectors and regulatory officers from several ministries and agencies may provide education and enforcement of all the requirements under the ROA, including the new proof of vaccination requirement.

20. How will this be enforced?
   Police and Provincial Officers (such as City of Ottawa By-law Officers) have authority to enforce the regulations under the Reopening Ontario (A Flexible Response to COVID-19) Act, 2020.

21. What are the consequences for not complying?
   Failure to comply with the said Regulation under the Reopening Ontario (A Flexible Response to COVID-19) Act, 2020 is an offence for which either the patron or the business or organization may be liable, on conviction, to a fine of $750 for individuals and $1,000.00 for corporations, for every day or part of each day on which the offence occurs or continues. Maximum penalties based on prosecution under Part I or Part III of the Provincial Offences Act, R.S.O. 1990, c.P.33 (POA), includes fines of up to $100,000 and up to one year in jail for an individual; up to $500,000 and up to one year in jail for an individual who is a director or officer of a corporation; and up to $10 million for a corporation.