

Date: February 7, 2022

**This version replaces what was previously posted on November 19, 2021.**

**To: Owners/operators of organizations that provide religious services, rites or ceremonies and/or operate places of worship in Huron and Perth Counties**

**Re: Letter of Instruction under the Reopening Ontario (A Flexible Response to COVID-19) Act**

Thank you for all your efforts thus far to mitigate the transmission of COVID-19 in your place of worship and associated religious and faith-based activities. We commend you on your continued leadership and cooperation in this important work to keep our communities safe.

I am writing to all Owners and Operators of places of worship (including religious and faith-based activities in other settings) to highlight your current responsibilities under the *Reopening Ontario (A Flexible Response to COVID-19) Act, 2020, S.O. 2020, c. 17* (the "ROA").

COVID-19 is a reportable, communicable disease under *the Health Protection and Promotion Act, 1990, R.S.O., c.H.7*, which poses a serious risk to the health of others and in the community where risks are not adequately managed.

The Province of Ontario, including Huron Perth, is currently experiencing a fifth wave of the COVID-19 pandemic, and the Omicron variant is circulating in our community.

These Instructions remain critical at this time. Between September and November 2021, Huron Perth Public Health identified that 11.4 % of new COVID-19 infections were directly associated with places of worship, and there were six outbreaks associated with religious/faith-based organizations. These outbreaks spread into the community. In one such outbreak, there were 48 confirmed cases, 13 probable cases, and over 240 high-risk contacts involving multiple households, a church, three schools and two workplaces. Omicron activity is widespread and transmission risk in places of worship remains high.

With colder weather moving people indoors, and religious and faith-based organizations planning winter special ceremonies and observances, it is critical that everyone continue to adhere to all public health measures during religious and faith-based activities that occur in places of worship and elsewhere, in order to assist our collective efforts in reducing the risk of COVID-19 transmission.

Notwithstanding what is listed in this *Letter of Instruction*, owners and operators of all places of worship and religious and faith-based organizations located within Huron and Perth Counties must comply with all relevant and applicable provincial legislation, requirements, Orders and guidance from, but not limited to, the Ministry of Labour, Training and Skills Development (MLTSD), Provincial government, and Huron Perth Public Health, in order to prevent the transmission of COVID-19. Notably, you must comply with all requirements under the *ROA* and associated regulations.

**Instructions to persons responsible for places of worship and associated religious and faith-based activities:**

As Medical Officer of Health for Huron Perth Public Health (HPPH), the following are my Instructions, issued pursuant to subsections 2(2) and 2(2.1) of Schedule 1 in Ontario *Regulation 364/20: Rules for Areas at Step 3 and At The Roadmap Exit Step* made under the *ROA*, 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*. HPPH has developed these instructions in consultation with the Office of the Chief Medical Officer of Health in accordance with subsection 2(2.1) of Schedule 1.

Where this *Letter of Instruction* imposes additional requirements not set out in the *ROA*, the requirements under this *Letter of Instruction* must be followed.

Effective immediately and until further notice, I am instructing all Owners, Operators, and Persons Responsible for places of worship and religious and faith-based activities within Huron and Perth Counties to:

1. Follow any and all applicable regulatory requirements pertaining to your place of worship and your religious and faith-based activities under the ROA.
2. Follow public health guidance including but not limited to:
  - **Gathering Limits: (Also refer to HPPH’s COVID-19 Checklist for Places of Worship)**
    - Adhere to the gathering limits set out by the Province with regard to indoor and outdoor weddings, funerals, services, rites, or ceremonies.
    - Adhere to the gathering limits set out by the Province with regard to public/private social/event gatherings held in meeting/event spaces at your place of worship, or rented space, or private homes. This includes but is not limited to wedding and funeral receptions.
  - **Public Health Guidance:**
    - Be aware of the most current, credible public health information/recommendations. For detailed guidance for Places of Worship review the Ministry of Health’s document *COVID-19 Advice: Religious Services, Rites or Ceremonies*: [https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/advice\\_religious\\_services.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/advice_religious_services.pdf) (Please note that this is the most current document available. Where the guidance does not align with this *Letter of Instruction*, the *Letter of Instruction* prevails).
    - HPPH COVID-19 Checklist for Places of Worship
  - **Workplace Safety Plan:**
    - Prepare a COVID-19 Workplace Safety Plan and be prepared to provide a copy of your Safety Plan to Huron Perth Public Health staff upon request AND post this plan in a conspicuous location visible to staff and attendees. The COVID-19 Workplace Safety Plan shall describe and include, but not be limited to, the following items:
      - cleaning
      - screening
      - physical distancing
      - vaccine certification (as required or optional depending on the setting and/or gathering – see below for further clarification)
      - training and education for all workers to ensure they understand their responsibility to follow public health guidelines to prevent COVID-19 in the workplace
    - To assist with development of your workplace safety plan, the Ministry of Labour, Training and Skills Development has created a “Workplace Safety Plan Builder.” This tool can be accessed here: <https://www.workplacesafetyplanbuilder.labour.gov.on.ca/>.
  - **Vulnerable individuals:**
    - Recommend vulnerable individuals take part in virtual or drive-in services; or offer a dedicated service for them.
  - **Screening for COVID-19 Symptoms and exposures:**
    - All individuals must complete COVID-19 screening and self-check for symptoms of illness at home before arriving for a church or worship service, ceremony or gathering. Use the most up-to-date COVID-19 self-assessment tool (<https://covid-19.ontario.ca/self-assessment/>).
    - Post signs at all building entrances informing individuals how to screen themselves for COVID-19 prior to entering.
  - **Vaccination:**
    - Vaccination requirements will further reduce the risk for all attendees, and can allow for increased capacity.
    - Ensure vaccine and identification verification for social gatherings associated with a wedding or religious service, rite or ceremony as required by regulation.
    - Optional: Verify the vaccine status of all eligible individuals aged 12 years and older when participating in a wedding, funeral or religious service, rite or ceremony; this will mean that your place of worship no longer needs to adhere to capacity limits or physical distancing requirements.
    - For more information, see: <https://covid-19.ontario.ca/proof-vaccination-information-businesses-and-organizations>
  - **Masks and face coverings:**
    - Ensure there is a mask/face covering policy for those entering enclosed public spaces in your place of worship, including exemptions set out by the Province.
    - Ensure wearing of non-medical masks/face coverings that cover the mouth, nose and chin

are mandatory indoors (unless an individual has a valid exemption), including during weddings, funerals, services, rites or ceremonies for all individuals unless food/drink is being consumed.

- Masks/face coverings must also be worn while outdoors where physical distancing cannot be maintained.
  - Ensure that staff wear personal protective equipment (medical mask and eye protection) indoors when they come within 2 metres of another person who is not wearing a mask/face covering and where there is no impermeable barrier in place. A face shield is not a substitute for a mask.
- **Capacity limits and physical distancing: (Also refer to HPPH’s COVID-19 Checklist for Places of Worship)**
    - If your place of worship chooses to implement vaccine and identification certification, then the requirement for capacity limits and physical distancing is removed in some settings. It is still recommended for people from different households to physically distance as much as possible.
    - Where your place of worship does not choose to implement vaccine and identification certification:
      - Maintain physical distancing by keeping 2 metres between all individuals not in the same household (e.g. use every other row, rearrange seating, remove seating, mark unavailable). Prevent group gatherings and overcrowding within the facility. Adhere to gathering/capacity restrictions set out by the Province. Seating members from the same household together does not permit an increase in overall capacity limits.
    - Social gatherings before or after in-person services, including those where food and drink are shared are subject to provincial gathering limits, and physical distancing as required. Social/event gathering limits are different than the limits permitted for religious services, rites, and ceremonies. For further guidance, review the requirements set out by the Province.
- **Music:**
    - Note that singing, choirs, and playing of brass/wind instruments are strongly discouraged.
    - Singers (e.g. those performing or leading) and players of brass/wind instruments must be separated from attendees by plexiglass or some other impermeable barrier where 2 metres cannot be maintained.
    - Physical distancing of 2 metres must be maintained from anyone outside their household.
    - Attendees must keep masks/face coverings on while singing.
- **Cleaning:**
    - Ensure properly stocked and frequently cleaned and disinfected hand wash and/or hand sanitizer stations are made available at the entrance and throughout the facility for everyone to wash/sanitize their hands as required (e.g. prior to sharing/distribution of materials/objects, etc.).
    - Clean and disinfect high touch surfaces/equipment frequently. Recommend cleaning and disinfecting twice per day at a minimum while in operation. Use only disinfectants that have a Drug Identification Number (DIN) approved by Health Canada and follow the manufacturer’s direction regarding contact time. Maintain cleaning and disinfecting logs.

### **3. Comply and cooperate with agents of HPPH to complete inspections and/or complaint investigations and/or case and/or outbreak investigations.**

#### **Failure to Comply**

Failing to comply with the requirements of *Ontario Regulation 364/20* can result in charges under the *Reopening Ontario Act*. If charged under Part I of the *Provincial Offences Act (POA)*, set fine amounts are \$750 for individuals and \$1,000 for corporations. Maximum penalties based on a prosecution under Part I or Part II of the POA include fines of up to \$100,000 and up to a year in jail for an individual; up to \$500,000 and up to a year in jail for an individual who is a director or officer of a corporation; and up to \$10 million for a corporation.

These Instructions, including any revisions to them, are available on the Huron Perth Public Health website at [Section 22 Orders and Instructions](https://www.hpph.ca/en/health-matters/section-22-orders-and-instructions.aspx) (<https://www.hpph.ca/en/health-matters/section-22-orders-and-instructions.aspx>).

HPPH has a checklist to assist places of worship to comply with requirements. For questions or inquires related to these Instructions, or to access the checklist please go to our website at [COVID-19 Information: Places of Worship](#)

(<https://www.hpph.ca/en/health-matters/covid-19-information-places-of-worship.aspx>) or call HPPH at 1-888-221-2133.

Sincerely,

*<Original signed by>*

Dr. Miriam Klassen  
Medical Officer of Health and CEO