



Ontario Government Releases Digital Vaccination Certificate App and QR Code System

October 22, 2021

Focus readers will recall that the Ontario government previously announced that **proof of vaccination** would be required in order for individuals to access select settings and businesses. The government has now released an “enhanced” vaccine certificate with a QR code for individuals and the QR code verification app for businesses in support of the proof of vaccination requirement. Additionally, regulatory changes have been made in support of the updated requirements.

Enhanced Vaccine Certificate

On October 15, the government **announced** that individuals could begin downloading their enhanced vaccine certificate. The enhanced vaccine certificate contains the individual’s name, date of birth, QR code, and vaccine dose information. While download availability was initially staggered, as of October 18, all individuals are able to access Ontario’s **COVID-19 vaccination portal** to download their enhanced vaccine certificate.

Individuals can still use the original vaccination receipts without a QR code as proof of vaccination. Paper or electronic versions of either the vaccination receipt (requiring visual verification) or the enhanced vaccine certificate (containing scannable QR code) are acceptable.

Verify Ontario App

Businesses are also now able to download the **Verify Ontario app**, which will allow them to scan and verify the QR codes of individuals wishing to gain access to their premises. The app will show one of the following results:

- The person is fully vaccinated (green checkmark - “Verified”);
- The person does not meet one of the criteria, meaning the individual is only partially vaccinated or 14 days have not passed from their second dose (red X - “Invalid certificate”); or
- The scan failed (yellow exclamation mark in a triangle - “There is a problem”).

If a green “verified” result is returned, the person’s name and date of birth will be shown so that the business or organization can check the information against a valid piece of identification. An individual who shows a red or yellow result may not enter unless they are able to provide an alternative proof of vaccination, such as an original vaccine receipt in paper or electronic form.



The app does not retain or store any data. It operates without an internet connection to scan most government-issued QR codes, but employers must connect to the internet weekly for the latest content and rules. The government recommends refreshing the app every week on a cellular or WiFi signal to make sure that the latest content and rules are loaded.

Regulatory Amendments

Additionally, [O. Reg. 364/20 – Rules for Areas at Step 3 and at the Roadmap Exit Step](#) (the “Regulation”) was **amended** effective October 15, 2021 to account for the new requirements.

The medical exemption wording was previously limited to written documentation from a doctor or a nurse in the extended class, but has now been broadened since medical exemptions will eventually be incorporated into the QR code system.

In addition to medical exemptions, an exemption has been added for participation in a Health Canada-authorized COVID-19 vaccine clinical trial. The [Ministry of Health’s guidance](#) outlines the documentation necessary to allow entry to individuals claiming such an exemption. Clinical trial exemptions will also be eventually incorporated into the QR code system.

The Regulation notes that businesses may only use an electronic application (app) that is listed in the Ministry of Health’s guidance published on its website for the purposes of verifying an individual’s fully-vaccinated or exempted status. Currently, Verify Ontario is the only authorized app.

Businesses or organizations may use information provided pursuant to the proof of vaccination provisions of the Regulation solely for verifying full vaccination or exemption status. Except for that purpose, no person is allowed to retain, record, copy, modify, use or disclose any information that is provided pursuant to the proof of vaccination provisions.

In Our View

The release of a QR code system and verification app will make it much easier and more efficient for businesses and organizations to verify vaccination status for those patrons who wish to use the enhanced vaccine certificate. While medical or clinical exemptions are not yet verifiable through the app and must still be visually verified, the eventual inclusion of such exemptions in the QR code will relieve businesses and organizations of the burden of having to review medical notes to determine whether an individual is properly exempted.

In addition to the [Ministry of Health’s guidance](#), it has prepared a [Questions and Answers](#) document for employers regarding the proof of vaccination requirement.

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