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TSSA Considerations during COVID-19 **April 15, 2020**

With the COVID-19 epidemic impacting organizations in Ontario in different ways, TSSA has been working closely with its regulated parties and stakeholders by taking several actions to help alleviate current constraints while ensuring safety is not compromised.

TSSA office staff are currently working from home and remain available to serve and support all of our valuable stakeholders.

[TSSA's notice](#) issued on March 25 outlines the COVID-19 safety approach that TSSA is taking in its own operations and in interacting with others. We continue to ask customers to contact us if they are facing COVID-19 related barriers and they are unsure how to proceed.

Operating an essential service during COVID-19 comes with the responsibility of operating safely. Regulated parties remain responsible for the safety of their sites, devices and procedures and in particular must focus on addressing any high risk sites, devices or situations.

In many circumstances TSSA is offering a grace period (see details below) for certain requirements such as:

- Training requirements
- Pre-licence inspections
- Periodic inspections in homes, facilities with vulnerable residents or other sites that are difficult to access safely or cannot be accessed due to the social distancing rules in Ontario

TSSA Modified Inspections and Inspection Deferrals

TSSA Inspections will continue where possible and if they can be done in accordance with government directives, TSSA and customers' COVID-19 procedures. Where inspections can occur using technology such as voice, online or other live-camera access, this option will be deployed when possible. However, TSSA will not perform inspections in homes or occupied areas of facilities with vulnerable residents except in the case of an emergency and where such inspections can be carried out in accordance with government directives. TSSA inspectors will be available to these customers upon their request. Inspections will be prioritized based on the level of public safety risk and COVID-19 implications.

Residential and Healthcare Facilities with Vulnerable Residents

- Long-term care homes and senior's residences
- Hospitals
- Retirement homes
- Personal dwellings – including homes, apartments and condos
- Community housing for non-critical routine inspections

Licensing Issuance, Renewals & Grace Periods

Regulated parties are required by law to maintain their licenses in good standing. Customers will be invoiced for all licensing-related services.

- **Licensing independent from inspection:** TSSA will continue to require organizations to renew their licenses before expiry.
- **Licensing (or Authorization) dependent on inspection:**
 - TSSA will continue to require organizations to renew their licenses (authorizations) before expiry.
 - TSSA will renew a license (or authorization) even in cases where the mandatory pre-license (or pre-requisite) inspection could not be performed, with a valid reason. TSSA will defer the inspection for 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.
 - The specific process for BPV COIs is noted below.

Certificate Holder:

- TSSA expects certificates to be renewed prior to expiry. If re-certification is conditional on continuing education that has not been fulfilled, mechanics must renew their certificates as required. Certificate holders will be given 120-day grace period from the date that social distancing requirements or the State of Emergency are lifted by the Government of Ontario in order to fulfill and submit their continuing education requirements to the TSSA.
- Commencing March 16, 2020 certificate holders may continue to work during the grace period so long as the certificate has been renewed as per the above policy.
- The certificate holder will receive their certificate with the correct expiration date. Proof of continuing education requirements once completed must be provided to TSSA.

Program Specific Procedures

Please also note these program-specific procedures:

BPV Record of Inspection and Certificate of Inspection:

- The Province has identified Insurance providers as [essential services](#) and as such, insurers who are responsible for completing periodic inspections should still be completing those inspections where possible, provided they are following the safe work practices advised by provincial health officials. Insurers and owners may have their own guidelines but are welcome to refer to and follow similar [guidelines for TSSA inspectors](#).
- Owners with operating equipment should, to the extent possible, still be requesting inspections in accordance with the Regulations and facilitating those inspections while still ensuring the safety of persons at their site as well as that of the inspector.
- In the event that an owner, an insurer or third party inspector are unable to complete an inspection, it is expected that all parties involved engage in a dialogue that will cover all essential elements such as ongoing maintenance and testing that may be necessary to ensure the continued safety of the device until such time as an inspection can be completed. The onus is on the operator and insurer to ensure that the device can continue to be operated safely.
- TSSA will not be pursuing or taking action if owners cannot obtain a Record of Inspection from their insurer, provided they take the steps noted above and ensure that the inspections are completed and certificates are renewed within 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.
- In the event that insurers or third party inspectors have deferred inspections, they are strongly encouraged to begin putting plans in place on how they will catch up on inspections when the state of emergency is lifted.
- Insurers, owners and third party inspectors are reminded of the importance of completing internal inspections during available windows of opportunity and are encouraged to complete these inspections as soon as reasonably possible, such as during summer shut down.

Propane:

- TSSA expects licenses to be renewed in accordance with the above noted policy. Licenses dependent on an inspection will follow the policy above by offering a 120 day grace period.
- TSSA will offer propane distributors a grace period to complete the 10-year inspections of tanks and appliances required by section 18 of O. Reg. 211/01 if they cannot be completed. TSSA recognizes that access to some locations such as private dwellings and long term care homes may be particularly difficult and fuel distributors must assess the ability to complete these inspections based on their and their customers' protocols. Propane distributors may continue to supply propane during the grace period. Inspections must be completed within 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.

- TSSA will continue to require propane licenses to be renewed as per the above-noted policy, before the date of expiry. However, if necessary, TSSA may offer licensees a 120 day grace period to submit a new or revised Risk and Safety Management Plan (RSMP). For new owners or where site changes necessitate a new RSMP they will be provided with a 120 day grace period from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.
- Company Directors and officers will be allowed a grace period of 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario to submit a new Record of Training (ROT) as part of the renewal process.
- ROT holders (individuals and individual teachers) will be given a grace period of 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario to renew their ROT. Online training for the theoretical component should be pursued if it is available.
- ROT training providers (companies) must renew their TSSA accreditation before its expiry and pay any associated fees, unless other arrangements are made.
- **Annual Mobile Food Inspections, Propane Terminal & Propane Dispenser Inspections**
As per Ontario Regulation 211/01, these installations must be inspected annually for propane supply. Similar to other grace periods, TSSA will defer the inspection requirement if it cannot be completed and allow a grace period of 120 days. Inspections must be completed within 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.

Fuels:

- TSSA will offer fuel oil distributors who supply fuel oil and who are unable to complete the distributor inspections as required by section 7 of O.Reg. 213/01 a grace period of 120 days to complete the inspections. The inspection must be completed within 120 days from the date that social distancing requirements and the State of Emergency are lifted by the Government of Ontario.
- **Non – Immediate Hazard Warning Tags**
As per Ontario Regulation 211/01, 212/01, 213/01, and 217/01 a non-immediate warning tag can be granted for a period of up to 90 days for deficiencies deemed non-immediate. Extensions on this requirement will be granted on a case by case basis.

Amusement Device Permit Renewals:

- TSSA is offering the following two scenarios to address permit renewal and device operation during The State of Emergency;
- Scenario 1: Existing Process

- Operators must complete Renewal Packages and book an inspection
- Scenario 2: Extension of Permits for devices that operated last season. (This does not apply to Initial permits.)
 - Operators will be permitted to operate a device during the 2020 – 2021 season despite the permit having been expired provided that the renewal package noted above has been provided to the director and inspections are completed within the grace period noted in the table below.
 - The following safety compliance documents are required in addition to the renewal package:
 - A Pre-inspection Checklist for all devices except for Ziplines and Inflatables.
 - A confirmation letter from the site mechanic that the device is in compliance with the Regulation 221/01 (Amusement Devices) and that all pre-existing orders have been complied with.
 - TSSA will send a letter of authorization to extend permit expiry dates once all *Renewal Package* and compliance documents are submitted.

Ziplines expiry date - June 30	30 day extension
Inflatables expiry date - May 31	30 day extension
Hard Rides expiry date - March 31	90 day extension

- Permit fees for devices will continue to be required upon renewal.
- Businesses that do not wish to renew their licences and permits for the season due to cancellations, don't need to maintain a valid licence and permit, if they will not be operating this season. This will not impact processes for 2021 – 2022.