

## Board Correspondence

March 2022

Date	From	Subject
February 3, 2022	Peterborough Public Health	Ltr to Ministry of Health – supporting the Windsor-Essex County correspondence re: <i>COVID-19 vaccine and the Immunization of School Pupils Act (ISPA)</i>
February 11, 2022	Peterborough Public Health	Ltr to Ministry of Health – <i>Enhancing uptake of third COVI-19 vaccine doses and the proof of vaccination record.</i>
February 23, 2022	Public Health Sudbury and Districts	Resolution #08-22 to alpha – <i>Health and Racial equity : Denouncing Acts and Symbols of Hate</i>

February 3, 2022

The Honourable Christine Elliott  
Deputy Premier and Minister of Health  
[christine.elliott@ontario.ca](mailto:christine.elliott@ontario.ca)

**Re: COVID-19 Vaccine and the Immunization of School Pupils Act (ISPA)**

Dear Minister Elliott:

At its meeting on January 12, 2022, the Board of Health for Peterborough Public Health (PPH) received correspondence from Windsor-Essex County (WEC) Board of Health, dated November 23, 2021.

PPH supports the WEC Board of Health's resolution that the Province of Ontario amend the Immunization of School Pupils Act to include COVID-19 as a "designated disease". Ontario has mandated that students be vaccinated against nine diseases such as polio, diphtheria, tetanus and measles before they can attend school and COVID-19 should be added to this list.

As shared by WEC, the addition of COVID-19 as a "designated disease" within the Immunization of School Pupils Act would support a number of important public health priorities including:

- Increased uptake of the vaccine, providing protection for those who are too young or medically unable to be vaccinated in school communities and beyond. This will result in a safer learning environment for students, staff, their families and the broader community; and
- A systematic framework for parental vaccine education.

COVID-19 vaccines are safe and effective for students 5 years of age and older. They are an essential tool to help to stop the spread of the virus and further support a safer school environment. In addition vaccinated students may see less time away from school due to illness, which will have positive impacts on both their physical and mental health.

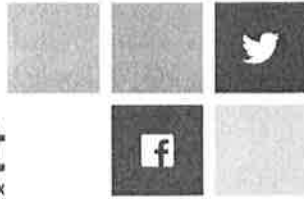
Respectfully,

***Original signed by***

Mayor Andy Mitchell  
Chair, Board of Health

/ag  
Encl.

cc: Hon. Stephen Lecce, Minister of Education  
Dr. Kieran Moore, Ontario Chief Medical Officer of Health  
Local MPPs  
Association of Local Public Health Agencies  
Ontario Boards of Health



November 23, 2020

Delivered via email: [christine.elliott@ontario.ca](mailto:christine.elliott@ontario.ca)

Hon. Christine Elliott, Deputy Premier  
Minister of Health  
Ministry of Health  
College Park 5th Flr,  
777 Bay St, Toronto, ON M7A 2J3

Dear Minister Elliott:

On November 18, 2021, the Windsor-Essex County Board of Health passed the following Resolution regarding the **COVID-19 Vaccine and the Immunization of School Pupils Act (ISPA)**. **WECHU's resolution is outlined below where the Windsor-Essex County Board of Health recommends that the Province of Ontario amend the Immunization of School Pupils Act to include COVID-19 as a "designated disease":**

Windsor-Essex County Board of Health

**RECOMMENDATION/RESOLUTION REPORT**

**COVID-19 Vaccine and the Immunization of School Pupils Act (ISPA)**

**November, 2021**

**ISSUE**

On Thursday October 28, 2021, Chief Medical Officer of Health Dr. Kieran Moore indicated during a news briefing that the Province of Ontario would not be adding COVID-19 to the list of nine diseases that public school students must be immunized against.

Currently, there is no requirement for eligible students to provide proof of vaccination against COVID-19 for school attendance. Schools are a high-risk setting for COVID-19 and other communicable diseases as they bring together large numbers of individuals for long and extended periods of time increasing the likelihood transmission of certain diseases. As of November 15<sup>th</sup>, there have been more than 450 cohorts of students dismissed through schools and daycares due to COVID-19 exposure. The Immunization of School Pupils Act (Ministry of Health, 2021) requires that children and youth attending school be immunized against designated diseases, unless they have a valid exemption. The addition of COVID-19 as a "designated disease" within the Immunization of School Pupils Act would support a number of important public health priorities including:

- Increased uptake of the vaccine, providing protection for those who are too young or medically unable to be vaccinated in school communities and beyond. This will result in a safer learning environment for students, staff, their families and the broader community.
- A systematic framework for parental vaccine education.

**BACKGROUND**

Vaccines are the safest and most efficient way to guard against communicable diseases and prevent outbreaks. The Immunization of School Pupils Act (ISPA) R.S.O. 1990 (Ministry of Health, 2021) requires that specified vaccines to be given for a child to attend school in Ontario making sure that all school aged children are protected from vaccine

preventable diseases. Currently under the ISPA, students must be immunized against measles, mumps, rubella, diphtheria, tetanus, meningococcal, varicella and polio, or have a valid Medical, or Conscience or Religious Belief exemption on file at the Health Unit. There is no cost for vaccines covered by the publicly funded immunization program in Ontario.

## MOTION

**Whereas** available COVID-19 vaccines have been approved by Health Canada to be safe and effective for students born in 2009 or earlier; and

**Whereas** additional approval by Health Canada to vaccinate individuals born after 2009 with COVID-19 vaccine is anticipated by the end of 2021; and

**Whereas** the COVID-19 pandemic is a global pandemic;

**Whereas** the Windsor-Essex region has been disproportionately affected by the COVID-19 pandemic; and

**Whereas** the Windsor-Essex region has lower rates of vaccination against COVID-19 particularly among eligible children and youth; and

**Whereas** the purpose of the Immunization of School Pupils Act is to increase the protection of the health of children against the diseases that are designated diseases; and

**Whereas** the IPISA requires that students be immunized for “designated diseases”: diphtheria, measles, mumps, poliomyelitis, rubella, and tetanus, unless a specific exemption is sought through the act.

**Now therefore be it resolved** that the Windsor-Essex County Board of Health recommends that the Province of Ontario amend the Immunization of School Pupils Act to include COVID-19 as a “designated disease”.

References:

Ministry of Health. (2021, April 19). *Immunization of School Pupils Act, R.S.O. 1990, c. / .1*. Retrieved from Government of Ontario Laws: [ontario.ca/laws/statute/90i01](http://ontario.ca/laws/statute/90i01)

We would be pleased to discuss this resolution with you and thank you for your consideration.

Sincerely,



Gary McNamara  
Chair, Board of Health



Nicole Dupuis  
Chief Executive Officer

c: Hon. Stephen Lecce, Minister of Education  
Dr. Kieran Moore, Chief Medical Officer of Health  
Association of Local Public Health Agencies – Loretta Ryan  
Greater Essex County District School Board – Erin Kelly  
Windsor Essex Catholic District School Board – Emelda Byrne  
CSC Providence (French Catholic) – Joseph Picard  
Conseil Scolaire Viamonde (French Public) – Martin Bertrand  
WECHU Board of Health  
Windsor City Council and Essex County Council

February 11, 2022

The Honourable Christine Elliott  
Deputy Premier and Minister of Health  
[christine.elliott@ontario.ca](mailto:christine.elliott@ontario.ca)

**Re: Enhancing Uptake of Third COVID-19 Vaccine Doses and the Proof of Vaccination Record**

Dear Minister Elliott:

At its meeting on February 9, 2022, the Board of Health for Peterborough Public Health (PPH) resolved to write to you regarding opportunities to improve uptake of third doses and consideration of updating Proof of Vaccination requirement to include third doses for those eligible.

There is increasing evidence that immunity can wane over time and that a third, or booster dose of the COVID-19 vaccine provides greater protection against severe outcomes due to COVID-19. This has led to all levels of government recommending a third, or booster dose to help restore and maintain protection against severe illness, complication or death due to COVID-19.<sup>1</sup> In Ontario, residents aged 18 and over are eligible to receive a third, or booster dose of the COVID-19 vaccine. Vaccination provides greater protection against severe illness and complications from COVID-19 and reduces the risk of hospitalization and strain on the health care system.

Evidence from IC-ES in Ontario has demonstrated increased vaccine effectiveness against symptomatic Omicron infection from no protection greater than 180 days after two doses, to 61% after a third dose.<sup>2</sup> This enhanced protection against infection provides evidence that third doses would be impactful in the prevention of community transmission and protect people from transmission of COVID-19 in non-essential settings where proof of vaccination is required.

In Peterborough and across the province, administration rates of third doses of COVID vaccine have slowed substantially and as of February 3, 2022, provincial coverage sits at 54.2%.<sup>3</sup> During the second last week of December, 2021, in Ontario, more than a million doses were administered however this had decreased to 335,753 doses during the fourth week of January, 2022.<sup>4</sup> Last week, there was only a 2.1% increase in 3rd vaccination rates from the previous week.<sup>5</sup>

Rates of vaccination amongst the most vulnerable groups, including those over the age of 50, have not yet attained rates achieved for second doses. In the PPH region they range from about 34% among those 18-29 and 82% among those 70 years and older.

Every effort should be made to continue to increase third, or booster dose coverage among the eligible population. These strategies include continued work to make vaccination more equitable and accessible by providing vaccination in convenient locations and through walk-in modalities. Additionally, as more vaccine becomes available supporting the choice of vaccination for individuals may improve uptake.

Recent experiences, both in Ontario and in other jurisdictions, have shown that vaccine policies, including proof of vaccination requirements, lead to higher vaccine uptake and therefore higher vaccination coverage overall. Requiring a 3<sup>rd</sup> dose for a valid proof of vaccination to access non-essential services is one of the most important policy levers that has been proven to work and should be pursued to continue to improve vaccine uptake and protect our communities.

We sincerely thank you for the consideration and your continued support in our vaccination rollout strategies.

Respectfully,

***Original signed by***

Mayor Andy Mitchell  
Chair, Board of Health

/ag

cc: Dr. Kieran Moore, Ontario Chief Medical Officer of Health  
Local MPPs  
Association of Local Public Health Agencies  
Ontario Boards of Health

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<sup>1</sup> [https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19\\_vaccine\\_third\\_dose\\_recommendations.pdf](https://www.health.gov.on.ca/en/pro/programs/publichealth/coronavirus/docs/vaccine/COVID-19_vaccine_third_dose_recommendations.pdf)

<sup>2</sup> Buchans, S. et al. Effectiveness of COVID-19 vaccines against Omicron or Delta symptomatic infection and severe outcomes. Accessed on February 3, 2022: <https://www.medrxiv.org/content/10.1101/2021.12.30.21268565v2>.

<sup>3</sup> <https://covid19-sciencetable.ca/ontario-dashboard/>. Accessed February 3, 2022.

<sup>4</sup> <https://www.publichealthontario.ca/en/data-and-analysis/infectious-disease/covid-19-data-surveillance/covid-19-data-tool?tab=vaccine>

<sup>5</sup> <https://covid19-sciencetable.ca/ontario-dashboard/> Accessed on February 3, 2022.



**Public Health**  
**Santé publique**  
SUDBURY & DISTRICTS

February 23, 2022

VIA ELECTRONIC MAIL

Dr. Paul Roumeliotis  
President  
Association of Local Public Health Agencies  
480 University Avenue, Suite 300  
Toronto, ON M5G 1V2

Dear Dr. Roumeliotis:

**Re: Health and Racial Equity: Denouncing Acts and Symbols of Hate**

At its meeting on February 17, 2022, the Board of Health for Public Health Sudbury & Districts carried the following resolution #08-22:

*WHEREAS the reduction of health inequities is a goal of Ontario's public health programs and services as set out in the Ontario Public Health Standards (OPHS), health equity is a Foundational Standard of the OPHS, and programs and services must be implemented in accordance with the Health Equity Guideline which includes the requirement to apply anti racist, anti-oppressive, and culturally safe approaches to public health practice; and*

*WHEREAS the Vision of the Board of Health for Public Health Sudbury & Districts, Healthier communities for all, is further guided by its Mission and Strategic Plan, both of which prioritize action in support of health equity; and*

*WHEREAS the Board of Health for Public Health Sudbury & Districts is a leader among Ontario local public health agencies in their longstanding commitment to health and racial equity, including notably, the September 2019 endorsement of the Racial Equity Action Framework for Improved Health Equity; and*

*WHEREAS recent events in Ontario have included public displays of racism, anti-Semitism and discrimination, all detrimental to optimal health for all and prompting the Ontario Public Health Association (OPHA) on January 31, 2022, to issue the following statement:*

*While the right to protest is a fundamental element of our democracy, OPHA is disturbed by the hate filled racist and white supremacist symbols and messages flowing from the demonstrations in Ottawa. We denounce all forms of hate, bigotry, racism, antisemitism, and discrimination. Acts and*

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*symbols of hate are unwelcome and should not be tolerated. Silence is not acceptable. We urge political leaders from all levels & parties to speak out against such hate and racism, and to promote the importance of vaccines and other public health measures that are protecting all of us, especially the most vulnerable, against illness, hospitalization, & death. Change can only happen when we stand up and speak out. Let's work together to build a society that values diversity, inclusion, and optimal health for all.*

*THEREFORE, BE IT RESOLVED THAT the Board of Health for Public Health Sudbury & Districts endorse the January 31, 2022, statement of the OPHA; and*

*FURTHER THAT the Board of Health encourage other Ontario boards of health and the Association of Local Public Health Agencies to do the same; and*

*FURTHER THAT that this resolution be shared with all boards of health, the Association of Local Public Health Agencies, area Honorable Members of Parliament and Provincial Parliament, the Ontario Public Health Association, the Association Municipalities of Ontario (AMO), among other stakeholders.*

A reduction of health inequities is a goal of Ontario's public health programs and services as set out in the OPHS. Both aPHa and local Boards of Health have a long-standing history of supporting various health equity measures (e.g., food security, Truth and Reconciliation Commission calls to action, living wage, low-income dental, use of a health equity lens, national pharmacare, extending the Ontario Pregnancy and Breastfeeding Nutritional Allowance). Thanks to efforts like these, public health addresses the social determinants of health and promotes health equity. There is still work to be done. Recent events in Ontario have included public displays of racism, anti-Semitism and discrimination, all detrimental to optimal health for all. In supporting health for all, it is important that public health not remain silent and instead state that acts and symbols of hate are unwelcome and should not be tolerated. Thank you for your consideration of this important matter.

Sincerely,



Penny Sutcliffe, MD, MHSc, FRCPC  
Medical Officer of Health and Chief Executive Officer

cc: All Ontario Boards of Health  
Loretta Ryan, Executive Director, Association of Local Public Health Agencies  
Pageen Walsh, Executive Director, Ontario Public Health Association  
Jamie McGarvey, President, Association of Municipalities Ontario  
Jamie West, Member of Provincial Parliament, Sudbury  
France G linas, Member of Provincial Parliament, Nickel Belt  
Michael Mantha, Member of Provincial Parliament, Algoma-Manitoulin  
Paul Lefebvre, Member of Parliament, Sudbury  
Marc Serr , Member of Parliament, Nickel Belt  
Carol Hugues, Member of Parliament, Algoma-Manitoulin-Kapusksing