September 29, 2015

The Honourable Kathleen Wynne
Premier
Minister of Intergovernmental Affairs
Room 281
Main Legislative Building
Queen's Park
Toronto ON M7A 1A1

RE: Memorandum from Dr. Robert Kyle, Commissioner & Medical Officer of Health, dated September 8, 2015 re: Immunization of School Pupils Act (ISPA) (Our File No. P00)

Honourable Premier, please be advised the Health & Social Services Committee of Regional Council considered the above matter and at a meeting held on September 23, 2015 Council adopted the following recommendations of the Committee:

“A) That the correspondence dated June 30, 2015 from the Sudbury & District's Medical Officer of Health to the Ministry of Health and Long-Term Care, urging the Ontario government to require health care providers to report to the local Medical Officer of Health all immunizations administered to patients under 18 years of age through a common electronic database be endorsed; and

B) That the Premier of Ontario, Minister Health and Long-Term Care, Durham's MPPs, Interim Chief Medical Officer of Health, alPHa, and all Ontario Boards of Health be so advised.”

Attached is a copy of the correspondence dated June 30, 2015 from the Sudbury & District's Medical Officer of Health to the Ministry of Health and Long-Term Care.

Debi A. Wilcox, MPA, CMO, CMM III
Regional Clerk/Director of Legislative Services

DW/np

Attach.

If this information is required in an accessible format, please contact the Accessibility Co-ordinator at 1-800-372-1102 ext. 2009.
c: The Honourable Eric Hoskins, Minister of Health and Long-Term Care
Joe Dickson, MPP (Ajax/Pickering)
The Honourable Tracy MacCharles, MPP (Pickering/Scarborough East)
Granville Anderson, MPP (Durham)
Jennifer French, MPP (Oshawa)
Laurie Scott, MPP (Haliburton/Kawartha Lakes/Brock)
Dr. David Williams, Interim Chief Medical Officer of Health
L. Stewart, Executive Director, Association of Local Public Health Agencies (aIPHa)
Ontario Boards of Health
R.J. Kyle, Commissioner & Medical Officer of Health
June 30, 2015

The Honourable Eric Hoskins
Ministry of Health and Long-Term Care
10th floor, 80 Grosvenor Street
Toronto, ON  M7A 2C4

Dear Minister Hoskins:

Re: Enforcement of the Immunization of School Pupils’ Act (ISPA)

Enforcement by the Sudbury & District Board of Health of the July 2014 legislative changes to the ISPA has highlighted significant challenges for local public health with respect to duplicate and incomplete immunization records. This is in part due to the fact that health care providers are not required to report immunizations to the Medical Officer of Health.

At its meeting on June 18, 2015, the Sudbury & District Board of Health carried the following resolution #25-15:

WHEREAS each public health unit in Ontario is required to enforce the Immunization of School Pupils Act by assessing and maintaining immunization records of school pupils (students) each year; and

WHEREAS parents/guardians whose child(ren) receive vaccine at a health care provider other than public health are required to provide notification of their child’s immunizations to their local public health unit; and

WHEREAS healthcare providers are not required under the provisions of the Health Protection and Promotion Act to report immunizations to the Medical Officer of Health; and

WHEREAS incomplete immunization records create significant challenges to the enforcement of the ISPA indicated by the numbers of students suspended from attendance at school under the Act, as well as parental and guardian frustration;

THEREFORE BE IT RESOLVED THAT the Sudbury & District Board of Health recommend to the Minister of Health and Long Term Care that amendments to provincial regulations be made requiring health care providers to report to the Medical Officer of Health all immunizations administered to patients under 18 years of age.
FURTHER THAT the Sudbury & District Board of Health advocate to the Minister of Health and Long Term Care for the integration of all health care provider electronic immunization records onto a common electronic data base to ensure efficient and accurate sharing of immunization records.

FURTHER THAT this motion be forwarded to the Association of Local Public Health Agencies, and to Ontario Boards of Health.

The Board of Health for the Sudbury & District Health Unit takes seriously its responsibility to promote and protect the health of children. The Board believes that measures to enable the accurate and timely reporting of immunizations by all health care providers for all children attending school in Ontario will greatly assist in the effectiveness and efficiency of the Board’s responsibility.

Sincerely,

Penny Sutcliffe, MD, MHSc, FRCPC
Medical Officer of Health

cc: Linda Stewart, Executive Director, Association of Local Public Health Agencies
Ontario Boards of Health