February 15, 2018

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

Dear Premier Wynne:

Re: Vaccine Recommendations for Childcare Workers

On October 27, 2017 at a regular meeting of the Board for the Grey Bruce Health Unit, the Board considered the attached correspondence from Durham Region Public Health and the Council of Ontario Medical Officers of Health regarding vaccine recommendations for childcare workers. The following motion was passed:

Moved by: Alan Barfoot  
Seconded by: Arlene Wright

“WHEREAS, it is the position of the Grey Bruce Health Unit to support vaccines for high risk groups and those working with high risk groups, which would include child care workers, and

WHEREAS, it is the position of the Health Unit that access to services should not be restricted due to financial hardship,

THEREFORE BE IT RESOLVED THAT, the Board of Health supports the recommendations of the Council of Ontario Medical Officers of Health with respect to providing publically funded vaccines for child care workers.”

Carried

Sincerely,

Hazel Lynn, MD, FCFP, MHSc  
Acting Medical Officer of Health  
Grey Bruce Health Unit

Cc: All Ontario Boards of Health

Encl.
October 12, 2017

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. R. Kyle, Commissioner and Medical Officer of Health – re: Vaccine Recommendations for Child Care Workers
Our File: P00

Please be advised that Committee of the Whole of Regional Council considered the above matter and at a meeting held on October 11, 2017, Council adopted the following recommendations of the Committee:

"A) That the correspondence from the Council of Ontario Medical Officers of Health (COMOH) requesting the Government of Ontario to amend the Publicly Funded Immunization Schedule such that vaccinations recommended for child care workers by Medical Officers of Health would be publicly funded for those workers, be endorsed; and

B) That the Premier of Ontario, Ministers of Finance and Health and Long-Term Care, Durham’s MPPs, Chief Medical Officer of Health and all Ontario boards of health be so advised."

Attached for your reference is a copy of the Memorandum from Dr. Kyle, Commissioner and Medical Officer of Health, dated October 4, 2017.

Ralph Walton
Regional Clerk/Director of Legislative Services

RW/np

Attach.

If this information is required in an accessible format, please contact 1-800-372-1102 ext. 2009.
c. The Honourable Charles Sousa, Minister of Finance
   The Honourable Eric Hoskins, Minister of Health and Long-Term Care
   Joe Dickson, MPP (Ajax/Pickering)
   Lorne Coe, MPP (Whitby/Oshawa)
   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, Chief Medical Officer of Health
   Ontario Boards of Health
   Dr. R.J. Kyle, Commissioner and Medical Officer of Health
MEMORANDUM

To: Committee of the Whole

From: Dr. Robert Kyle

Date: October 4, 2017

Re: Vaccine Recommendations for Child Care Workers

On July 18, 2017, the Council of Ontario Medical Officers of Health (COMOH) sent the attached correspondence to the Chief Medical Officer of Health of Ontario and the Assistant Deputy Minister, Population and Public Health Division, Ministry of Health and Long-Term Care. The correspondence outlines COMOH’s recommendations regarding public health requirements in the Immunization of School Pupils Act and the Child Care and Early Years Act, 2014 (CCEYA).

One of the recommendations requests the Government of Ontario to amend the Publicly Funded Immunization Schedule such that vaccinations recommended for child care workers by Medical Officers of Health (MOHs) would be publicly funded for those workers.

As articulated in Ontario Regulation 137/15 of the CCEYA, child care operators are required to ensure that employees have immunizations as recommended by the local MOH. COMOH has agreed that all MOHs will, at a minimum, recommend that all child care workers receive vaccines recommended by the National Advisory Committee on Immunization (NACI). NACI recommends two immunizations for child care workers which are not currently publicly funded for adults (unless they meet high-risk eligibility criteria). These include immunization against varicella (i.e., chickenpox) and hepatitis B.

Given the low wages of child care workers and the high cost of these vaccines, I recommend that the Committee of the Whole recommends to Regional Council that:

a) The correspondence from COMOH as regards vaccine recommendations for child care workers is endorsed; and

b) The Premier of Ontario, Ministers of Finance and Health and Long-Term Care, Durham’s MPPs, Chief Medical Officer of Health and all Ontario boards of health are so advised.
Respectfully submitted,

Original signed by

R.J. Kyle, BSc, MD, MHSc, CCFP, FRCP, FACP, MCh
Commissioner & Medical Officer of Health
July 18 2017

Dr. David Williams
Chief Medical Officer of Health
393 University Ave 21st Flr
Toronto, ON  M5G 2M2

Ms. Roselle Martino
Assistant Deputy Minister, Health and
Long-Term Care
777 Bay St #1903
Toronto, ON  M7A 1S5

Dear Dr. Williams and Ms. Martino,

Re: COMOH Recommendations – ISPA and CCEYA

On behalf of members of the Council of Ontario Medical Officers of Health (COMOH), I am writing to inform you of the Council’s adoption of recommendations for local medical officers of health (MOHs) to follow regarding public health requirements for the Child Care and Early Years Act and the Immunization of School Pupils Act.

The recommendations are meant to encourage coordinated practice across all 36 health units, and prevent discrepancies, especially as children and adults move between health units.

1. The Child Care and Early Years Act – Vaccine Recommendations for Child Care Workers:

Under section 57, any vaccinations recommended by MOHs for child care workers become mandatory under the Act. COMOH has agreed that all MOHs will at minimum recommend that all child care workers receive vaccines that the National Advisory Committee on Immunization (NACI) recommends* for this group, excluding influenza vaccine.

Some of these vaccinations are not publicly-funded, and the costs of purchase and clinician’s fees must be borne by individual. Unfortunately, child care workers are identified in the Ontario Poverty Reduction Strategy as in need of income supplementation given their low wages and we want to ensure that financial barriers are not an obstacle to protecting these individuals and the children in their care.

COMOH therefore requests that the Publicly Funded Immunization Schedule be amended such that vaccination recommended for child care workers by MOHs (per NACI recommendation) would be publicly funded for those workers.

Currently the gaps are varicella and hepatitis B vaccinations, however, as hepatitis B is included in the school vaccination program and many adults have pre-existing natural immunity for varicella, the financial impact is expected to be relatively small. This also supports the Ministry’s Immunization 2020 Action #18, to develop targeted health equity approaches for vulnerable communities.
2. The Immunization of School Pupils Act (ISPA):

I) Period of Grace for Vaccination Given up to 4 Days before the Required Date:

COMOH has received for information the recommendation that MOHs consider a 4-day grace period when using the discretionary provision to decide whether to suspend a student under the ISPA. This grace period is meant to strike a balance between the goal of ISPA (to ensure that children are properly vaccinated) and its inflexible timing requirements that are in some cases an impediment to reaching it.

It is up to each MOH to decide, based on his/her discretionary provision, how to implement this in their health unit. Currently, the administrative exemption is the only tool in Panorama for a health unit to use for this purpose and is being recommended for health units to utilize when accepting a vaccine that was administered before the required date.

➤ COMOH therefore requests that the Ministry consider a new tool for health units to utilize when implementing a period of grace.

In particular, the following features should be considered:

- The early dose should be accepted as valid meaning no exemption is required, similar to the estimated vaccination date. There should be no increase to the number of exemptions in the database and no need to analyze these numbers in local/provincial coverage reports.

- There are no impacts to the forecaster and the client will proceed through screening activities without any follow up required.

- These clients will not appear on at-risk reports during an outbreak. If an administrative exemption is used, these clients will appear on ‘at risk’ reports during an outbreak and staff involved with outbreak management need to assess these records individually prior to contact/case management.

- There is less risk for errors in forecasting and/or screening practices if a separate Panorama function is created.

II) Communication Campaign for Health Care Providers by Ministry

As part of Immunization 2020 Action #8, the Ministry has agreed to launch a coordinated immunization communication strategy. COMOH is requesting the Ministry to work closely with health care partners to share important immunization information to make informed immunization decisions.

➤ COMOH therefore requests that the Ministry provide clear guidance to all physicians in Ontario to vaccinate children according to Ontario’s Publicly Funded Immunization Schedule, especially adhering to provide vaccinations on or after the specified age (with particular attention to MMR and Meningococcal C vaccinations given on or after the 1st birthday and Tdap-IPV vaccine given on or after the 4th birthday).

COMOH is fully supportive of ensuring high vaccination rates and preventing disease outbreaks in child care centres and schools. We would be pleased to share further background from the COMOH ISPA
Working Group that developed these recommendations should you require it, and we look forward to working with you to implement the above recommendations.

Sincerely,

[Signature]

Dr. Penny Sutcliffe
Chair, Council of Ontario Medical Officers of Health

COPY: Dr. Jessica Hopkins, Chair, COMOH ISPA Working Group
