February 3, 2022

The Honourable Christine Elliott
Deputy Premier and Minister of Health
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

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 15th, 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 IPSA 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:


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