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the public health units
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Ontario Association of
Public Health Dentistry

Ontario Society of
Nutrition Professionals
in Public Health

July 22 2013

Taddesse Haile
Director, Education Statistics & Analysis Branch
777 Bay Street
4th Floor, Suite 422
Toronto, Ontario M5G 2E5

Dear Mr. Haile,

Re: Standardization of Pupil (Student) Immunization Data

On behalf of members of the Council of Ontario Medical Officers of Health (COMOH) of the Association of Local Public Health Agencies (alPHa), I am writing in response to your letter of June 20, 2013 to Directors of Education regarding the process of data exchange between schools / school boards and Public Health Units.

While Ontario's Medical Officers of Health find much in the letter with which we are in agreement, and for which we are grateful, I am writing to request a meeting to discuss the paragraph at the top of page 2; the instruction that specific parental consent must be obtained prior to releasing a student's gender to public health. This is currently causing disruption of the immunization program in many health units and totally grinding it to a halt in one.

Immunization is one of the greatest public health advances of the modern era and is responsible for saving millions of lives annually worldwide. Public Health in Ontario counts the teachers, supervisors, boards and Ministry staff of the Ministry of Education as amongst our most valuable allies in the delivery of an effective immunization system in Ontario. As indicated in the letter of June 20, improving the process of data exchange between schools/school boards and Public Health Units and strengthening the accuracy and timeliness of student information is needed to reduce the number of suspension letters and suspensions. These improvements are also needed to ensure accurate immunization records at the personal and provincial level.

The *Immunization of School Pupils Act* recognizes the vital relationship between school and public health unit. Section 1 of Regulation 645 reads as follows:

- 1. A record of immunization maintained by a medical officer of health with respect to a pupil shall contain,**
- (a) the name of the pupil in full;
 - (b) the date of birth of the pupil;
 - (c) the sex of the pupil;
 - (d) the name of the school attended by the pupil;
 - (d.1) the pupil's health number, as defined in the *Health Cards and Numbers Control Act, 1991*;
 - (e) a record of all the pupil's immunization against designated diseases showing,
 - (i) the type of vaccine given,
 - (ii) the date of administration of the vaccine, and
 - (iii) any reactions to the vaccine;
 - (f) any statement of medical exemption that pertains to the pupil showing the effective time period on the statement; and
 - (g) any statement of religious belief that pertains to the pupil. R.R.O. 1990, Reg. 645, s. 1; O. Reg. 299/96, s. 1.

It is not possible for a Public Health unit to enter data into the provincial recording system, IRIS, without entering the student's gender (indicated by the more archaic term 'sex' in the above regulation). Since students move frequently, having immunization recorded accurately in the provincial database is essential.

Unfortunately, there appears to be a disconnect between what the Immunization of School Pupils Act requires a Medical Officer of Health to collect and what the Education Act seems to allow a school to disclose.

As Health Information Custodians under PHIPA, Medical Officers of Health absolutely respect the need for privacy and the requirement to collect only those elements of personal health information which are permitted by Statute above and which are necessary for our purpose. It is my understanding that different health units have achieved solutions which fill our needs while respecting the constraints under which school boards operate.

Thank you very much for your interest in accurate, and especially secure, transfer of data. I look forward to your response concerning a joint discussion that can help move this important agenda forward.

Best regards

A handwritten signature in cursive script, appearing to read 'Jaeger'.

Dr. Valerie Jaeger,
Chair

Copy: Dr. Arlene King, Chief Medical Officer of Health;
Dr. Robin Williams, Associate Chief Medical Officer of Health, Infrastructure & Systems (Transition)
Mr. Barry Pervin, Assistant Deputy Minister of Education, Instruction and Leadership Development
Division