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**Constituent Societies**

OPHNL – Ontario Public Health  
Nursing Leaders

Alliance for Healthier Canadians

Association of Supervisors of  
Public Health Inspectors of Ontario

Canadian Institute of Public Health  
Inspectors (Ontario Branch)

Community Health Nurses'  
Initiatives Group (RNAO)

Health Promotion Ontario

Ontario Association of Public  
Health Dentistry

Ontario Dietitians in Public Health

Association of Public Health  
Epidemiologists

Ontario Society of Physical Activity  
Promoters in Public Health

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Health Protection and Surveillance Policy and Programs Branch  
Office of the Chief Medical Officer of Health, Public Health  
Ministry of Health  
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June 21, 2020

**Re: Proposed Changes to Regulation 569 (Reports) under the Health Protection and Promotion Act, R.S.O. 1990, c. H.7. (Proposal #20-HLTC031)**

Dear Dr. Williams,

I am writing on behalf of the members of the Ontario Public Health Association to indicate our support for the Ministry of Health's proposed amendments to Paragraph 11 of Section 5 of the Reports Regulation that would require information on race, income level, language, and household size for individuals who test positive for a novel coronavirus, including COVID-19 be collected. OPHA also recommends that information about disability also be added to this list as a requirement.

By adding disability to this list of required areas for standardized provincial wide data collection (i.e. race, income, language, and household size) for cases of COVID-19, a more complete picture can be provided of who is being affected by COVID-19 and more effective public health practices and interventions can be designed and implemented in response to COVID-19.

Collecting such data, including on disability, is a critical step to promoting health equity and understanding trends and those who may be vulnerable. The more that data related to those affected by COVID-19 can be analyzed, the better we will be able to surface the differences between groups within the larger community. As noted by the Canadian Institute for Health Information, "measuring inequalities in health and health care is a key step in identifying differences that may be considered unfair or unjust and that can be acted on to improve health equity in Canada.... addressing inequity starts with the data."

Those with disabilities are often among the poorest and most marginalised in any community. By having such disaggregated data, the province and local health units will be able to better plan and design appropriate interventions which can help to detect the virus and prevent and ensure those with disabilities are not overlooked. Our colleagues at Sudbury District Health Unit have been examining this issue more closely and can offer advice as to effective ways to collect such data among this population group.

Thank you for your consideration.

Yours sincerely,



Pegeen Walsh,  
Executive Director  
Ontario Public Health Association

**References:**

Canadian Institute for Health Information. Pan-Canadian Dialogue to Advance the Measurement of Equity in Health Care: Proceedings Report. Ottawa, ON: CIHI; 2016

**Disability:** *Refers to whether an individual has a long-term or recurring physical, mental, sensory, psychiatric or learning impairment and is considered to be at a disadvantage. Disability may be captured by functional status, activities of daily living score or specific disability category (e.g., physical disability, learning disability). (From CIHI)*