

199 Quetico Ave.
Oshawa, ON L1J 1E9

Tel: (416) 367-3313
Fax: (416) 367-2844
E-mail: admin@opha.on.ca
www.opha.on.ca

President

Lisa Demaline
E-mail: president@opha.on.ca

Executive Director

Pegeen Walsh
E-mail: pwalsh@opha.on.ca

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'
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Health Promotion Ontario

Ontario Association of Public
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Ontario Dietitians in Public Health

Association of Public Health
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Ontario Society of Physical Activity
Promoters in Public Health

Charitable Registration
Number 11924 8771 RR0001

The Honourable Christine Elliott
Minister of Health
College Park 5th floor,
777 Bay St, Toronto, ON M7A 2J3

May 17, 2021

Dear Minister Elliott,

RE: Bill 283, Schedule 1, COVID-19 Vaccination Reporting Act 2021

I am writing on behalf of the Ontario Public Health Association to urge your government to consider amendments to Schedule 1 of the Covid-19 Vaccination Reporting Act, 2021 under Bill 283 to require that all health care providers, public health units, pharmacies and others administering vaccine programs be mandated to collect socio-demographic data, especially related to race, ethnicity and disability. As this legislation and the related schedules are now being considered by the Social Policy Committee of the Ontario Legislature, OPHA wanted to underscore the importance of such amendments being made. I have also attached our recent submission on this topic to the Social Policy Committee.

The collection of socio-demographic data is critical to: ensure that residents in Ontario have equitable access to vaccines, help health planners monitor and report on vaccine roll out progress, track whether certain population groups, especially those that have been disproportionately impacted by COVID-19 are being given priority attention, monitor whether vaccines are benefiting all socio-demographic groups equally across the province, and help determine where information can be improved, so that individuals have the facts they need to make informed decisions about vaccination.

While we appreciate that various systems have already been set up to administer vaccines, with half of Ontarians still waiting to get a first dose and most waiting for a second dose, it would be timely to ensure such data is collected. Your ministry could draw on the expertise of those health agencies that have experience in collecting race-based data. Public Health Ontario has created a data collection tool entitled, *Collecting Information on Race, Ethnic Origin, Income, Household Size, and Language Data: A Resource for Data Collectors*. With Public Health Ontario as the lead, the ministry has a foundation upon which to implement this new requirement.

As Public Health Ontario has noted “experience in a Canadian health setting suggests that people are open to answering socio-demographic questions if they understand why the data are being collected and that providing the information will not negatively impact treatment or access to services.” Some options for collecting such data could include: adding socio-demographic questions to the provincial vaccine registration portal, asking those that have been vaccinated to complete a questionnaire either in person or in writing while they are waiting the 15 minutes after they have been vaccinated, and/or as part of

a quality improvement process, sending those who have been vaccinated a questionnaire asking about their experience as well as socio-demographic questions.

While the existing wording of schedule 1 of the COVID-19 Vaccination Reporting Act, 2021 indicates that “persons and entities that administer COVID-19 vaccines are required to provide certain information to the Ministry of Health”, our concern is that this wording is too vague and needs to be more specific to ensure this opportunity to inform a equitable access to vaccines is not lost.

Thank you for your consideration.

Yours sincerely,



Pegeen Walsh
Executive Director
Ontario Public Health Association

Cc: Ms. Robin Martin, Parliamentary Assistant to the Minister of Health and Member,
Standing Committee on Social Policy
Dr. David Williams, Ontario’s Chief Medical Officer of Health

More about the Ontario Public Health Association:

OPHA is a member-based, not-for-profit charitable organization that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public’s health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including influencing public policy, capacity building, research, and knowledge exchange. Our membership represents many disciplines from across multiple sectors. OPHA is also home to Nutrition Connections (formerly the Nutrition Resource Centre) which advances nutrition knowledge and collaboration.