



### Context

- A teleconference between Vaccination Risk Awareness Network (VRAN) and Ministry of Health and Long-Term Care (MOHLTC) representatives took place on Monday, February 24, 2014. The objective of the teleconference was to provide an opportunity for VRAN to express their perspectives about immunization programs in Ontario. Notes from the meeting were recorded in a separate document.
- The Ministry agreed to provide a written response to some items that were brought up on the teleconference. VRAN made additional comments in follow-up to the teleconference. This document provides a consolidation of the follow-up responses that have been provided to date.

### Contacts

MOHLTC:	Dianne Alexander, (A) Manager, Immunization Policy and Programs Kevin Cherry, Strategy and Policy Advisor, Immunization Policy and Programs
VRAN:	Rita Hoffman, Vice-President, VRAN Edda West, Co-ordinator, VRAN Heather Fraser, VRAN

### Follow-up Items

**#1.** Rita Hoffman from VRAN expressed the following: “My hope is to establish first that vaccines are a medical procedure with side effects that include death and we can agree to that from the start. In correspondence received from the MOHLTC, it has been hard to get any kind of feeling that the MOHLTC acknowledges that there are risks and damage from vaccines. Is that something we can all agree on?”

MOHLTC Response to VRAN Comment #1 above:

*Immunization saves lives and prevents many serious vaccine preventable diseases. The Public Health Agency of Canada states that immunization has saved more lives in Canada than any other health intervention in the last 50 years. Thanks to vaccines, infectious diseases that were the leading cause of death worldwide 100 years ago are now the cause of less than five per cent of all deaths in Canada. Immunization protects the health of Ontarians by preventing disease. Vaccines are safe. Most people who receive vaccines have little to no side effects, and serious reactions are very rare. The risk of serious reactions from vaccines is very small compared to the risks from the diseases they prevent.*

**#2.** VRAN expressed concern about the availability of information about exemptions from the immunization requirements for school attendance under the *Immunization of School Pupils Act*. VRAN does not feel there is sufficient information on the Ministry’s website regarding how parents can obtain an exemption, and was not able to locate the exemption forms online.

MOHLTC Response to VRAN Comment #2 above:

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The Ministry's website advises parents of children who require an immunization exemption to contact their local public health unit. Public health units are responsible for collecting and assessing immunization records required for school attendance under the Immunization of School Pupils Act. The exemption forms are available on the Ontario government's online central forms repository ([www.forms.ssb.gov.on.ca](http://www.forms.ssb.gov.on.ca)) and can be found using the search function on the site. They can be accessed directly at the following links:

*Statement of Medical Exemption:**English:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWE&TIT=4895&NO=014-4895-64E>

*French:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=&ENV=WWF&TIT=4895&NO=014-4895-64F>

*Statement of Conscience or Religious Belief:**English:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=1&ENV=WWE&TIT=4897&NO=014-4897-64E>

*French:*

<http://www.forms.ssb.gov.on.ca/mbs/ssb/forms/ssbforms.nsf/FormDetail?OpenForm&ACT=RDR&TAB=PROFILE&SRCH=1&ENV=WWF&TIT=4897&NO=014-4897-64F>

VRAN Additional Comment #2(a):

VRAN has noted that a search they conducted on the forms repository using certain keywords did not return both the Statement of Medical Exemption and the Statement of Conscience or Religious Belief forms in all cases. Specifically, in comments submitted by VRAN on May 14, 2014, VRAN indicated that:

*We are pleased to see that a search for "immunization" from the Ontario Forms Repository website brings up the Statement of Conscience and Religious Belief form on the first page of results. That said, we searched (May 7, 2014) for "exemption" and only the medical exemption form came up on page 3 of the results. There was no link returned for the Statement of Conscience and Religious Belief form while searching for "exemption".*

*Further searches (May 7, 2014) are as follows:*

*Search for "vaccine" returned no results.*

*Search for "vaccination" returned no results.*

*Search for "Vaccine exemption" returned no results.*

*Search for "immunization exemption" returned only the medical exemption form*

*Search for "immunization of school pupils" did return the Statement of Conscience and Religious Belief form*

*Parents will continue to have a difficult time finding the Statement of Conscience and Religious Belief form at the Ontario Forms Repository website.*

**Follow-up Items**MOHLTC Response to VRAN Comment #2(a):

*The Ministry appreciates this feedback and will follow up with the administrator of the forms repository to discuss the search functionality.*

VRAN Additional Comment #2(b):

VRAN provided additional comments on May 14, 2014 as follows:

*VRAN was recently contacted by an Ontario resident who interpreted the information on the MOHLTC web page titled "Immunizations for School Attendance" as vaccination was mandatory for school in Ontario, with no exemptions. The page is viewable here:*

*<http://www.health.gov.on.ca/en/public/programs/immunization/ispa.aspx> . "Last Modified: 2014-04-16"*

*This web page makes no mention of vaccine exemptions available under the Immunization of School Pupils Act.*

*We would like to point out the Niagara Region Public Health website gives complete information regarding exemptions, and we believe all health units and the Ministry of Health should follow their template: Exemption from School Vaccinations*

*<http://www.niagararegion.ca/health/vaccinations/children/exemption.aspx>*

*VRAN continues to request that the MOHLTC provide full details about exemptions on their website, press releases and printed materials and also provide a direct link to the Statement of Conscience and Religious Belief form on their website.*

MOHLTC Response to VRAN Comment #2(b):

*This ministry web link referred to in the comments above entitled "Immunizations for School Attendance" includes a link to a School Immunization Checklist which does refer to exemptions as follows:*

*"If your child requires an immunization exemption, please speak to your local public health unit. Note that children who are exempt from immunization are at increased risk and may be removed from school during a disease outbreak."*

VRAN Additional Comment #2(c):

VRAN provided additional comments on August 7, 2014 as follows:

*The School Immunization Checklist is a PDF document. If a member of the public does not have a PDF reader on their computer they will not be able to view the exemption information, which is at the very end of the PDF document in a type size so small that some would require a magnifying glass to read the text. The "School Immunization Checklist" describes "New mandatory immunizations" in very large letters*

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*circled in red on the main page of the document. VRAN would like to emphasize that the Immunization of School Pupils Act does not use the word "mandatory" anywhere in the text, nor any word that implies immunization is compulsory. Use of the word "mandatory" in this document implies there is no choice, and further undermines the basic right to informed consent when considering immunization.*

*Also, the Immunization of School Pupils Act does not say that parents have to speak to their local public health unit to obtain an exemption, as the School Immunization Checklist describes. The MOHLTC is not providing readily accessible information about exemptions, or an accessible way for parents to obtain exemption forms.*

*VRAN continues to be contacted by the public regarding information from health units implying "mandatory immunizations", here are two examples:*

*Waterloo Region Poster re: "Mandatory Immunizations Are Changing" - no mention of exemptions on this poster.*

*[http://chd.region.waterloo.on.ca/en/researchResourcesPublications/resources/PHYSUP\\_MAR14.pdf](http://chd.region.waterloo.on.ca/en/researchResourcesPublications/resources/PHYSUP_MAR14.pdf) (see page 3 for the poster)*

*Halton Region flyer re: Menactra - no mention of exemptions, and "Menactra will be mandatory like diphtheria, tetanus and polio vaccines."*

*<http://vran.org/wp-content/uploads/Halton-Region-Notice-2014-Menactra.pdf>*

*VRAN would like to emphasize that if the MOHLTC was dedicated to fully informing the public and providing informed consent they would include exemption information and a links to the exemption forms on the "Immunization for School Attendance" page, as well as providing exemption details in a more prominent place on the "School Immunization Checklist" page.*

**MOHLTC Response to VRAN Comment #2(c):**

*The Immunization of School Pupils Act requires parents to have their children immunized in accordance with the prescribed program of immunization for designated diseases, unless they provide a valid Statement of Medical Exemption or Statement of Conscience or Religious Belief to their local medical officer of health. The prescribed program of immunization is specified in Regulation 645 under the ISPA, which sets forth the minimum number of doses required, required minimum intervals between primary series doses, and required booster doses.*

*Please see:*

*[http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90i01\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90i01_e.htm)*

*[http://www.e-laws.gov.on.ca/html/regs/english/elaws\\_reqs\\_900645\\_e.htm](http://www.e-laws.gov.on.ca/html/regs/english/elaws_reqs_900645_e.htm)*

*Under the ISPA, medical officers of health are responsible for maintaining records of immunization for school pupils within their jurisdiction, including records of exemption. As such, parents are required to contact their local public health unit if their child requires an exemption from the immunization requirements. Local public health units are able to advise parents on the process for completing and providing a Statement of Medical Exemption or*

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*Statement of Conscience or Religious Belief. For example, since the Statement of Conscience and Religious Belief requires a Commissioner to commission the statement, public health units may be able to advise parents regarding individuals within their communities who are able to sign as a commissioner. Some public health units may also employ a Commissioner who is able to perform this function.*

**#3. VRAN summarized its requests outlined in previous correspondence.**MOHLTC Response to VRAN Comment #3 above:

*The ministry has noted VRAN's concerns and will take these comments into consideration as part of its ongoing monitoring and review of its publicly funded immunization programs in the context of continuous quality improvement.*

VRAN Additional Comment #3(a):

On May 14, 2014, VRAN submitted the following additional comments to the ministry:

*We have recently documented numerous media reports of the April 16, 2014 MOHLTC press release that imply mandatory vaccination and do not mention exemptions including the CBC, Ottawa Sun, the print version of the Toronto Star, Canadian Press and numerous smaller papers throughout Ontario leaving Ontario residents largely in the dark about exemptions under the ISPA.*

*Also, press releases from Ontario Health Units continue to say "mandatory" vaccines with no mention of exemptions. (2)*

References:

*(1) Keeping Children Safe From Harmful Diseases - Ontario Strengthens Immunization Requirements for Next School Year - April 16, 2014*

*<http://news.ontario.ca/mohltc/en/2014/04/keeping-children-safe-from-harmful-diseases.html>*

*(2) National Immunization Awareness Week: Vaccines are Your Best Defence - Middlesex-London Health Unit - April 24, 2014*

*<https://www.healthunit.com/news/2014-national-immunization-awareness-week>*

*VRAN fails to see any progress in any of the 10 requests to the Ministry of Health as of May 7, 2014. We continue to believe, as stated in the teleconference that individual rights under Charter of Rights and Freedoms and the Consent to Treatment Act are being denied when individuals and parents are not given full disclosure of exemption rights under the Immunization of School Pupils Act.*

MOHLTC Response to VRAN Comment #3(a):

*The Ministry's news release of April 16, 2014 (available at <http://news.ontario.ca/mohltc/en/2014/04/keeping-children-safe-from-harmful-diseases.html>) includes the following statement pertaining to exemptions: "Parents of children who require an immunization exemption should speak to their local public health unit. Children who are exempt from immunization are at increased risk and may be removed from school during a disease outbreak." This*

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*statement was also included in communications materials developed for parents. Public health units are responsible for collecting and assessing immunization records required for school attendance under the Immunization of School Pupils Act, including records of exemption where applicable.*

VRAN Additional Comment #3(b):

VRAN provided additional comments on August 7, 2014 as follows:

*The Immunization of School Pupils Act does not state that parents have to speak to their local public health unit to obtain an exemption. Also, the news release states the following: "The province has updated the immunization requirements for the 2014/15 school year to include new mandatory immunizations and dose requirements that align with changes to Ontario's publicly-funded Immunization Program." Again, VRAN would like to emphasize that the Immunization of School Pupils Act does not use the word "mandatory" anywhere in the text, nor any word that implies immunization is compulsory. Use of the word "mandatory" in this document implies there is no choice, and further undermines the basic right to informed consent when considering immunization.*

*As well, the media continues to exclude exemption information:*

<http://www.mykawartha.com/news-story/4726714-are-your-child-s-vaccinations-current-if-not-they-may-not-be-able-to-go-to-school-this-september/>

*July 30, 2014 - Are your child's vaccinations current? If not, they may not be able to go to school this September - Peterborough health unit warns that changes to the law now mean that children must be vaccinated against meningococcal disease, whooping cough and chickenpox to attend school*

[http://www.thestar.com/news/queenspark/2014/07/01/queens\\_park\\_gears\\_up\\_for\\_summer\\_session.html](http://www.thestar.com/news/queenspark/2014/07/01/queens_park_gears_up_for_summer_session.html)

*July 2, 2014 - Queen's Park gears up for summer session - Politics at Queen's Park will heat up Wednesday as the Premier Kathleen Wynne Liberals flexes its majority government muscle.*

<http://www.stmarysindependent.com/no-shots-no-school/>

*July 18, 2014 - No shots, no school!*

[http://www.simcoemuskokahealth.org/JFY/Newsroom/newsrelease/Details/14-07-02/health\\_unit\\_pleased\\_with\\_vaccine\\_record\\_response\\_from\\_parents.aspx](http://www.simcoemuskokahealth.org/JFY/Newsroom/newsrelease/Details/14-07-02/health_unit_pleased_with_vaccine_record_response_from_parents.aspx)

*July 2, 2014 - Health unit pleased with vaccine record response from parents*

[http://www.bayshorebroadcasting.ca/news\\_item.php?NewsID=67252](http://www.bayshorebroadcasting.ca/news_item.php?NewsID=67252)

*June 30, 2014 - More Vaccinations Needed - Health Unit wants youngsters vaccinated for three additional diseases*

MOHLTC Response to VRAN Comment #3(b):



Public Health Policy and Programs Branch  
Public Health Division  
Ministry of Health and Long-Term Care

**MEETING FOLLOW-UP**  
**(January 15, 2015)**

**Follow-up Items**

*Please see "MOHLTC Response to VRAN Comment #2(c)" on pages 4 and 5 for further information on this topic.*

*The ministry appreciates the comments provided by VRAN and will continue to take them into consideration as part of its ongoing monitoring and review of its publicly funded immunization programs in the context of continuous quality improvement.*