

Policy Memo:

Support for Removing Exemption Clause from
the Immunization of School Pupils Act, 2017

TO: The Honourable Christine Elliott, Ontario Minister of Health

FROM: Parents Supporting School Immunization (PSSI)

DATE: December 10, 2019

SUBJECT: Support for Removing Exemption Clause for Conscience or Religious Beliefs from the [Immunization of School Pupils Act, 2017](#)

Executive Summary

Parents Supporting School Immunization is requesting that the Ontario Minister of Health amend the *Immunization of School Pupils Act, 2017* to lift the exemption clauses. As parents who follow the legislation, we allow our children to participate in immunization before admittance to a public school or daycare. We accept the perceived risk inherent in immunizations, and by the majority of our children being vaccinated, due to community immunity, even unimmunized children are protected from exposure to infectious diseases. (Vaccines, 2017)

It is mandatory that children in the province of Ontario receive the required immunizations to attend public school or daycare, under the *Immunization of School Pupils Act, 2017* (Government of Ontario, 2017). Ontario and British Columbia are the only provinces in Canada with this requirement. New Brunswick has recently passed legislation to make them mandatory there as well (Global News, November 22, 2019).

However, there are clauses in the *Immunization of School Pupils Act, 2017* (Government of Ontario, 2017) which allows parents to request that their child be exempt from immunization for medical reasons, or for conscience or religious beliefs. The exemption from immunization for conscience or religious beliefs puts vulnerable school aged children, and vulnerable members of the public at risk of contracting vaccine-preventable communicable diseases (Centre for Disease Control and Prevention, 2015).

Introduction and Problem Definition

The anti-vaccination movement is a continuing threat to the integrity of Ontario's immunization program. Although, the majority of parents' support immunization programs in schools, they are often the silent majority. At the same time, a growing number of parents are showing signs of "vaccine hesitancy" – although this group of parents are not outright rejecting vaccinations for their children, they are considering it or delaying immunization. (Johnson, 2019)

This trend is of deep concern. In order to protect the health of all Ontarians, this policy memo requests the Ontario Minister of Health, the Honourable Christine Elliott, to lift the exemption clause for conscience or religious beliefs from the *Immunization of School Pupils Act*. The exemption from immunization for conscience or religious beliefs puts vulnerable children in the public schools and vulnerable members of the public at risk of exposure to infectious, but vaccine-preventable communicable diseases.

Methods

The Parents Supporting School Immunization working group reviewed and analyzed the relevant legislation and media reports on the issue of mandatory immunization for children in public schools and daycares in Ontario. They also reviewed and analyzed relevant information on vaccine safety (Centres for Disease Control and Prevention, 2015).

Issue Analysis

Vaccinations have been integral to improving public health and saving lives and Ontario must remain vigilant in protecting these gains. Also, we must follow the recommendations of our medical health professionals, in order to uphold our public health standards and protect the health of Ontarians. (Report Vaccines: The Best Medicine, 2014)

In a detailed 2014 Report by the Chief Medical Officer of Health of Ontario to the legislative assembly, titled "Vaccines: The Best Medicine" it was noted:

About 95 per cent of Toronto children are immunized against measles. However, because measles is highly infectious and persists in other parts of the world, just a small decline in measles vaccination rates in Toronto — to 90 per cent — could result in over 10,000 infections within 20 years and 100,000 infections in 30 years. (Page 27, Report Vaccines: The Best Medicine)

This section of the report titled, "Vaccines Protect Us" underscores the importance of sustained vaccination programs where everyone participates to protect the community, the vulnerable, and prevent occurrences of outbreak. These facts cannot

continue to be ignored by those who oppose vaccinations. (Report Vaccines: The Best Medicine)

There have recently been outbreaks of measles in British Columbia and New Brunswick (Global News, 2019), (Government of Canada, 2019). As a result, the provincial governments in those provinces have now reintroduced legislative amendments that lift the clause allowing exemption from immunization for non-medical reasons (Global News, November 22, 2019).

As well, recently, the Toronto Board of Health passed a vote to urge the Ontario Ministry of Health to lift a clause from the *Immunization of School Pupils Act, 2017* (Government of Ontario, 2017), that allows parents to exempt their children from receiving vaccinations based on philosophical and religious beliefs (CTV News, September 23, 2019).

In the same news article, a spokesperson for The Ministry of Health, Hayley Chazan made the statement, “The Ministry of Health is continually evaluating the best available evidence to improve the uptake of vaccines, reduce risk of disease outbreaks, and achieve better health for all Ontarians” (CTV News, September 23, 2019).

As a group of concerned parents, we find the Ontario Ministry of Health’s lack of response to the Toronto Board of Health’s recommendation to lift exemptions troubling.

To reduce disease outbreaks, the province must ensure all parents remain vigilant in supporting the vaccination of their children to eradicate preventable disease in the 21st century. A Report released in 2014, by the Chief Medical Officer of Health of Ontario to the Legislative Assembly outlined that immunization has prevented more illness and disability second to the provision of safe drinking water (Chief Medical Officer of Health, 2014).

Proposed Solutions

To address this issue, it is proposed that the Minister of Health lift the exemption clauses for conscience or religious beliefs, in Subsections 2, 3, and 4 from the *Immunization of School Pupils Act, 2017* (Government of Ontario, 2017). As well, the Vaccine Education Certificate program offered by public health units should be revised and updated with more relevant and accurate information.

Strategic Recommendations

In 2016, measures were put in place to strengthen the Immunization of School Pupils Act that required parents who applied for an exemption, to attend an education session before approval. Also, the Immunization 2020 program required doctors to report a student's immunization record directly to the school board on a student's immunization record instead of placing the onus on the parent. However, since the program took effect, rates for exemptions have increased. (Ministry of Health Publication, 2015)

We believe that with the dissemination of proper information, substantiated by facts contained within medically researched findings in reports issued by the government of Ontario, parents who are vaccine hesitant, will make better informed decisions.

For example, it would be beneficial for vaccine hesitant parents to know that vaccines in Ontario are monitored for safety. It is a requirement to report any adverse reactions to a vaccine and findings based on a review are included in public vaccine safety reports. (Vaccines: The Best Medicine Report, 2014)

Toronto Public Health reported there has been a slow but steady increase in the number of parents opting for vaccine exemptions for their children. The exemption rate climbed to 1.72 per cent in 2018-2019. (Johnson, 2019)

Limitations

The limitations to this policy recommendation (lifting Subsections 2, 3 and 4 of the *Immunization of School Pupils Act, 2017*) to the Ontario Minister of Health are that parents who do not support mandatory vaccination may make the argument that their rights and freedoms are being infringed upon. However, if their children are not immunized, then the right to safety from vaccine-preventable diseases for vulnerable people is being infringed upon.

Cost-Benefit Analysis

As mentioned earlier, there have been several recent outbreaks of measles in Canada (Government of Canada, 2019). If the clause for exemption from immunization for conscience and religious beliefs is not lifted, this will put vulnerable people at risk for vaccine-preventable diseases, and raise the risk of Canada losing its measles-free status, for example, similar to the risk to the US (CNN Health, September 23, 2019).

Currently, due to community or herd immunity, the majority of vaccinated children are protecting those who are unvaccinated, since those immune children would not pass along deadly viruses. However, unvaccinated children are posing a health risk to the public at large including those with compromised immune systems, pregnant expectant mothers, and elderly people or seniors.

Since, incidences of vaccines causing serious illness is rare - the risks are one in a million for an individual to have a severe allergic reaction called anaphylaxis - and vaccines are tested in batches before they are administered, parents should have confidence in Canada's stringently regulated vaccination program. (Ontario Government of Health Fact Sheet)

References:

Measles, Mumps, Rubella, and Varicella Vaccine Vaccines. (2019). Retrieved December 13, 2019, from https://www.cdc.gov/vaccinesafety/vaccines/mmr-vaccine.html?CDC_AA_refVal=https%3A%2F%2Fwww.cdc.gov%2Fvaccinesafety%2Fconcerns%2Fautism%2FIndex.html

Vaccines Protect Your Community | Vaccines. (2017). Retrieved from Vaccines.gov website: <https://www.vaccines.gov/basics/work/protection>

Cohen, E. (2019, August 28). CDC: US could lose measles elimination status. Retrieved December 13, 2019, from CNN website: <https://www.cnn.com/2019/08/28/health/us-measles-elimination-status-in-jeopardy/index.html>

aalhakim. (2019, November 22). New Brunswick to remove non-medical exemptions from immunization record requirements. Retrieved December 13, 2019, from Global News website: <https://globalnews.ca/news/6205902/new-brunswick-remove-non-medical-exemptions-immunization/>

Government of Canada. (2019). Measles and Rubella Weekly Monitoring Report - Week 36: September 1, 2019 to September 7, 2019. Retrieved from: <https://www.canada.ca/en/public-health/services/publications/diseases-conditions/measles-rubella-surveillance/2019/week-36.html>

Government of Ontario, Chief Medical Officer of Health. (2014). Vaccines: The Best

Medicine, 2014 Annual Report of the Chief Medical Officer of Health of Ontario to the Legislative Assembly of Ontario. Retrieved from:

http://www.health.gov.on.ca/en/common/ministry/publications/reports/cmoh_14_vaccines/docs/cmoh_14_vaccines.pdf

Law Document English View. (2014, July 24). Retrieved December 13, 2019, from Ontario.ca website: <https://www.ontario.ca/laws/statute/90i01>

(2019). Retrieved from Ontario.ca website: <https://www.ontario.ca/page/vaccines-children-school>

VACCINE SAFETY IS IMPORTANT TO ALL OF US : INFORMATION FOR PARENTS.

(n.d.). Retrieved from

http://www.health.gov.on.ca/en/pro/programs/immunization/docs/hcp_fact_sheets_safety.pdf

VACCINES : THE BEST MEDICINE 2014 ANNUAL REPORT OF THE CHIEF MEDICAL OFFICER OF HEALTH OF ONTARIO TO THE LEGISLATIVE ASSEMBLY OF ONTARIO. (n.d.). Retrieved from

http://www.health.gov.on.ca/en/common/ministry/publications/reports/cmoh_14_vaccines/docs/cmoh_14_vaccines.pdf

2017- 2018 Published Plans and 2016-2017 Annual Reports - Public Information - MOHLTC. (2017). Retrieved December 13, 2019, from Gov.on.ca website:

<http://www.health.gov.on.ca/en/common/ministry/publications/plans/ppar17/#1.1>

Johnson, N. (2019, September 23). Anti-vaxxers protest recommendation to remove non-medical exemptions for Ontario students. Retrieved from Toronto website:

<https://toronto.ctvnews.ca/anti-vaxxers-protest-recommendation-to-remove-non-medical-exemptions-for-ontario-students-1.4606142>

Immunization 2020: Modernizing Ontario's Publicly Funded Immunization Program -
Ministry Reports - Publications - Public Information - MOHLTC. (2015).

Retrieved December 13, 2019, from Gov.on.ca website:

http://www.health.gov.on.ca/en/common/ministry/publications/reports/immunization_2020/