

February 25, 2021

Honouable Christine Elliott, Minister of Health
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We are writing to obtain further clarity regarding the recent updates published by the Ontario Government to expand eligibility criteria for individuals during Phase I and II of the COVID-19 vaccine rollout.

The Ontario Government now includes the following groups in its Phase I and II Rollout Plan:

- All Indigenous adults
- Adult recipients of chronic home care
- Individuals with high-risk chronic conditions and their caregivers; and
- Other populations and communities facing barriers related to the determinants of health across Ontario who are at greater risk for COVID-19

While we interpret this as including high-risk individuals with disabilities living in the community, it is unclear how this plan will be operationalized to ensure that individuals with disabilities are included, and that accessibility is a paramount consideration in planning. The information available to date does not offer details of who is included in these groups, particularly “Adult Chronic Home Care Recipients” in Phase I and “Individuals with High Risk Chronic Conditions and their Caregivers” in Phase II.

These terms must encompass a broad range of services and supports that persons with disabilities rely on. A clearer understanding of who falls within these two categories is important for achieving equality, fairness, and for minimizing harm to these at-risk groups.

As the Ontario Government has indicated that decisions regarding local distribution of the vaccine will fall on regional health authorities without existing legislative definitions that would otherwise provide clarity regarding who is included in these categories, we are concerned that vaccine distribution will not be truly inclusive.

The individuals we serve are placed in two very significant risk categories. First, many have co-morbidities and are therefore at high risk physically. Secondly, many of the individuals that we serve require personal support services that create close contact making the transmission of COVID-19 virus from an individual who is infected very likely. The dilemma then faced by those we serve, and the staff who support them is profound.

Frequently, individuals living with disabilities are further faced with barriers respecting many of the social determinants of health. These include poverty, lack of transportation and isolation. This places them at even greater risk of suffering due to illness, mental health issues and morbidity due to barriers in accessing hospital care. A vaccine will remediate many of these concerns and save unnecessary resources that would otherwise be spent on critical care for these individuals.

While the above noted Phase I and II priority groups are not defined at law, and are ambiguous in their direction to regional health authorities, without prejudicing the ability of individuals to being included, we do consider the diverse home care services offered pursuant to the *Home Care and Community Services Act, 1994, S.O. 1994, c. 26*, as well as recipients of Direct Funding programs for attendant services, and diverse services and supports offered through the Ministry of Children, Community and Social Services. We stress the need for a human rights based purposive and inclusive approach to interpreting the composition of the above noted groups.

We thank you in advance for considering our request.

Regards,



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