

**September 24, 2021**

**Memorandum to:** Directors of Education  
Secretary/Treasurers of School Authorities

**From:** Nancy Naylor  
Deputy Minister

**Subject:** **COVID-19 Immunization Assessments for Vaccine Eligible Students**

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As requested by the Chief Medical Officer of Health, local public health units (PHUs) will be assessing COVID-19 immunization information for eligible students (i.e., individuals born in 2009 or earlier) to support case, contact and outbreak management in schools.

While COVID-19 immunization is not mandatory for students, knowing the COVID-19 immunization status of students will assist PHUs during outbreak investigations in schools, identifying students who are unimmunized or partially immunized to promote vaccine uptake, and supporting coverage assessment and any reporting by schools or school boards.

### **Process**

As they do for other immunization assessments (i.e., under the *Immunization for School Pupils Act (ISPA)*), PHUs will extract COVID-19 vaccine records from the provincial COVaxON system and cross reference with school enrolment/class lists submitted to them from the school boards in order to determine which students are fully, partially or unvaccinated. At times, information in COVaxON may not match student information contained on class lists. In these instances, the PHU will reach out directly to parents or students to confirm details.

To reduce discrepancies that may be found with the student data, beginning October 1, 2021 or earlier, school boards are expected to upload student lists to Panorama. To ensure that information in Panorama is as close as possible to the student enrolment in each class, school boards should update elementary enrolment every semester at a minimum, and update secondary enrolment at every change in cohort, whether secondary timetables are based on octomester, quadmester, modified semester or semester. Students in hybrid or virtual learning should be included.

The Ministry of Health and the Ministry of Education have also reviewed this assessment process with the Office of the Information Privacy Commissioner (IPC), and based on their recommendation have updated the privacy impact assessment.

## **Communication to Students/Families**

As the Ministry of Health is the health information custodian for data in COVaxON, these immunization records are being disclosed to local PHUs under Section 39(2)(a) of the *Personal Health Information and Privacy Act* (PHIPA) as a disclosure that is made for the purposes of the *Health Protection and Promotion Act* (HPPA).

School boards are to work with their PHU(s) to communicate the process being undertaken to all parents/legal guardians of eligible students. To support this, the ministry has developed a Draft Template Letter for Public Health Units/School Boards (attached) that highlights the public health rationale for vaccinations and the need for the student immunization assessments.

We are encouraged by the progress made to date and remain committed to ensuring a healthy and safe start to the upcoming school year. By having a better sense of COVID-19 vaccine uptake at the school level, additional strategies and resources can be made available to support the work of local PHUs.

As we have done throughout this pandemic, we will continue to rely on the expert advice and recommendations from Ontario's Chief Medical Officer of Health and other medical experts to ensure we keep children, students, staff, and families safe.

Thank you for your ongoing partnership as we continue to ensure the safety of students and staff in this school year.

Sincerely,

Nancy Naylor  
Deputy Minister

c: Board COVID-19 Leads

Executive Director, Association des conseils scolaires des écoles publiques de l'Ontario (ACÉPO)

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