



January 15, 2021

Hon. Christine Elliott
Minister of Health
College Park 5th Floor
777 Bay Street
Toronto, ON M7A 2J3
By email: christine.elliott@ontario.ca

Dear Minister Elliot,

I hope this letter finds you well.

The Centre for Independent Living in Toronto (CILT) is the provincial administrator for the Direct Funding Self-Administered Attendant Service Program (DF Program) funded by the Ministry of Health. We are writing to you with growing concerns regarding Ontario's COVID-19 vaccination roll-out plan. To date, Ontario's vaccine plan has not included the people we support through the DF Program, nor the front-line healthcare workers they employ, as a Priority One population, despite their increased vulnerability to disproportionately negative impacts from COVID-19.

The DF Program is a self-managed attendant service program that supports 1000 individuals with disabilities (known as Self-Managers) to hire and maintain their own attendants who assist with activities of daily living, like eating, dressing, using the bathroom, and bathing. Attendants and self-managers cannot physically distance and must interact in-person daily. Self-Managers employ more than 3400 attendants across Ontario, many of whom work for multiple Self-Managers on the program.

Direct Funding program Self-Managers are:

- people with disabilities including those with communication disabilities, those who are dependent on ventilators, and those with medical complexities and multiple co-morbidities;
- individuals living with neurodegenerative conditions; and,
- individuals classified as complex alternate level of care inpatients prior to their transition to the community, and frail seniors at risk of losing the ability to age in place
- live in all Ontario Health Regions across the province
- typically do not access any other OH Region services

The DF Program has supported Self-Managers with medical complexities to live independently in their own homes for more than 25 years. The program was designed as an alternative to long-term care and has proven to be successful at ensuring that people can maintain their independence and autonomy. Many Self-Managers would be in LTC or ICU without the DF Program since they use ventilators and/or may require other aerosol generating medical procedures to live safely at home. In acknowledgement of the importance of this program, CILT was named in the Ontario government's March 2020 Listing of Essential Services (item 59).

The Ontario Government's Ethical Framework for COVID-19 Vaccine Distribution states that "Vaccine distribution and prioritization decisions must comply with existing human rights protections and take additional steps necessary to prevent and treat COVID-19 among vulnerable groups." The Framework references the Ontario Human Rights Commission's Policy statement on a human rights-based approach to managing the COVID-19 pandemic which clearly states that "People with disabilities, mental health needs and/or addictions" must be viewed as a vulnerable group disproportionately negatively affected by COVID-19. Ontario Health's recent Operating Model also identifies "people with disabilities" as a distinct diverse community whose needs are to be addressed.

Despite sharing the medical complexity and vulnerability of those residing in LTC, and despite MOH and the OHRC acknowledging the disproportionate negative impacts of COVID-19 on people with disabilities, DF Program Self-Managers and their healthcare workers are not considered the same priority for vaccination as LTC residents and healthcare workers.

We urge you, Minister Elliot, to direct Public Health Ontario and local administering Public Health Units across Ontario to include Direct Funding Program Self-Managers and their healthcare workers as the same priority as LTC clients and healthcare workers, and to roll out vaccines to them as an immediate priority on a provincial level.

It is important to note that many of the people we support on the DF Program could be deprioritized for treatment under the province's proposed Triage protocol should Ontario experience a surge in COVID cases, and yet concrete plans for vaccinating Self-Managers and their healthcare workers remain absent.

Healthcare workers exist outside of hospitals and medically complex clients also live in the community, with the support of Independent Living organizations like CILT. **Ontario's Ethical Framework goals of Equity, Fairness and Transparency for vaccine distribution cannot be met without recognizing the vulnerabilities of the Direct Funding Program's Self-Managers and their healthcare workers and including them as priority populations.**

As well, many people with disabilities living in the community, unattached to MOH programs, are still waiting to understand when and how they will be vaccinated. This

population must be considered as well.

CILT requests an opportunity to discuss our urgent concerns with you and assistance we can offer in the development of a vaccine rollout to Direct Funding program participants. We would also welcome the opportunity to discuss how to better address the needs of Independent Living service providers who have not been clearly included in Public Health Ontario and Ministry of Health responses to the COVID-19 Pandemic.

Sincerely,



Wendy Porch, M. Ed.
Executive Director, CILT

cc: Jacques LeBlanc, Chair/President, CILT
General (retired) Rick Hillier, Chair COVID-19 Vaccine Distribution Taskforce
Colleen Geiger, President and Chief Executive Officer (acting); Public Health Ontario
Dr. David Williams, Chief Medical Officer of Health
Amy Olmstead, Executive Lead, Ontario Health Teams
Ann Schragger, Director, Home and Community Care
Seema Sethi, Ministry of Health, Acting Manager, Home and Community Care Branch
Tess Romain, CEO, Ontario Health (Toronto)
Lindsay Wingham-Smith, Interim Vice President, Home and Community Care
Erin Scholl, Director, Performance Management, Ontario Health (Toronto)
Emily Beduz Director of Pandemic Response