



## MIDDLESEX-LONDON HEALTH UNIT

REPORT NO. 05-23

TO: Chair and Members of the Board of Health

FROM: Dr. Alexander Summers, Medical Officer of Health  
Emily Williams, Chief Executive Officer

DATE: 19 January 2023

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### COMPLIANCE WITH THE *IMMUNIZATION OF STUDENT PUPILS ACT* IN MIDDLESEX-LONDON

#### Recommendation

*It is recommended that Report No. 05-23 re: Compliance with the Immunization of Student Pupils Act in Middlesex-London be received for information.*

#### Key Points

- The *Ontario Immunization of Student Pupils Act* requires all students in elementary and secondary school to be immunized against nine vaccine preventable diseases or provide a valid exemption. Students who are not in compliance with the *ISPA* are suspended from school.
- The COVID-19 pandemic has resulted in lower *ISPA* compliance and immunization coverage amongst school-aged children. The MLHU has made substantial efforts to improve vaccination coverage in the region, but there remains a significant gap between pre-pandemic and current vaccination coverage for school-aged children.
- In order to mitigate the risk of outbreaks of vaccine preventable diseases in the region, the MLHU is proceeding with the suspension process. The MLHU will continue to take steps to mitigate and limit the number of students that are suspended.

#### Background

The *Immunization of Student Pupils Act* (*ISPA*) requires students attending elementary and secondary school to have proof of up to date immunization against nine vaccine preventable diseases or provide a valid exemption. The specific diseases include diphtheria, tetanus, polio, measles, mumps, rubella, meningococcal disease, pertussis and varicella (for children born in 2010 or after). Students who are not in compliance with the *ISPA* are suspended from school.

Prior to the pandemic, the MLHU annually reviewed immunization records of students to ensure compliance with *ISPA*. A school-based vaccination program was offered to 12-year-old students to ensure compliance for three publicly funded vaccines including meningococcal disease, hepatitis B and Human Papillomavirus (HPV). However, due to the COVID-19 response in 2020/21 and 2021/22, the frequent closures of schools prevented the VPD team from providing regular school vaccination clinics. Concurrently, primary health care access was restricted, limiting students' opportunities to be vaccinated. Lastly, the capacity of Health Unit staff to assess *ISPA* compliance was limited due to redeployments.

To assess the impact of the pandemic-associated factors on *ISPA* compliance and immunization coverage, a comprehensive review and analysis of the vaccination database was completed by the Population Health Assessment and Surveillance Team (PHAST) in the fall of 2022. This analysis determined that the COVID-

19 pandemic has resulted in lower ISPA compliance and immunization coverage amongst school-aged children, specifically:

- Compared to 2018/19 school year, ISPA compliance among 7-year-old students decreased by approximately 2% to 49% throughout the 2019/20, 2020/21, 2021/22 school years, depending on the disease. Immunization coverage among this cohort decreased by approximately 5% to 48% during the same period.
- Compared to 2018/19 school year, ISPA compliance among 17-year old students decreased by approximately 1% to 45% between the 2019/20 and 2021/22 school years, depending on the disease. Immunization coverage also decreased significantly throughout COVID-19 impacted school years, by approximately 1% to 44%.
- For both 7 and 17-year-old students, coverage in the 2021/22 school year was below levels from pre-pandemic school year, as well as national vaccination coverage goals for these age cohorts.

To address this gap, MLHU undertook a campaign to review the immunization records of all children in Middlesex-London from junior kindergarten to Grade 12. Records were assessed to determine if the child was up to date for all vaccines outlined in the ISPA, as well as those offered through school-based programs. Notification letters were mailed to families of students who were overdue for vaccines or for whom immunization records were unavailable. Families were given the opportunity to submit paper records directly to MLHU for entry into the record system or were provided direction and guidance to submit records electronically. To support the availability of vaccines, MLHU offered student-focused clinics for families to ‘catch-up’ on over-due vaccines. Through this process, over 42,000 letters were sent to families, resulting in the submission of nearly 15,500 immunization records. Approximately 4,000 students were vaccinated (7,735 vaccines administered) at MLHU-operated community ‘catch-up’ clinics. At this time, most students who are still not in compliance with the ISPA will have received two notification letters and have had opportunities to address the outstanding concern.

These efforts have improved vaccination coverage in the region, but there remains a significant gap between pre-pandemic and current vaccination coverage for school-aged children. The impact of the screening and immunization efforts was most obvious in the ISPA compliance and coverage estimates for the 7-year-old cohort, as well as the 12-year-old cohort coverage for school-based vaccinations. Compared to the 2020/21 school year, increase in compliance and coverage were observed in the 2021/22 school year for nearly all diseases in these age groups. In contrast, ISPA compliance and coverage consistently decreased across all school years among 17-year old students, despite enhanced screening and immunization opportunities offered in the 2021/22 school year.

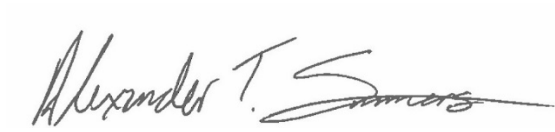
## **Next Steps**

To further address the gap in ISPA compliance and improve vaccination coverage, the MLHU is proceeding with implementing the suspension process starting in January 2023 and proceeding monthly through June 2023. The MLHU will continue to take steps to mitigate and limit the number of students that are suspended. Suspension letters will be mailed to families one month ahead of the date of suspension to provide enough time to submit an updated record, receive the outstanding vaccine, or submit an exemption request. Additional Health Unit staff will be available to support the submission of records or exemption requests, and supplemental MLHU-operated community ‘catch-up’ clinics will be available.

Suspensions will unfold over 6 cohorts, including both elementary and secondary students, from January to June 2023. The MLHU is working closely with partnering school boards, and consideration has been given to the timing of exams, particularly for secondary school students.

The objective of this work is to ensure that the risk of vaccine preventable diseases remains low in the Middlesex-London region.

This report was prepared by the Vaccine Preventable Disease team within the Environmental Health and Infectious Disease Division.

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