

Upcoming Changes to the Immunization of School Pupils Act (ISPA) - Reporting Requirements for Health Care Providers

Attention: Physicians, Emergency Departments, Infection Control Practitioners, Nurse Practitioners, Walk-In Clinics/Urgent Care Clinics, Family Health Teams, Central LHIN, NSM LHIN

Date: June 6, 2018

On May 30, 2017, the *Protecting Patients Act, 2017* received Royal Assent, including provisions in Schedule 2 that would amend the Immunization of School Pupils Act (ISPA) to:

- Require mandatory education sessions for parents who request a non-medical exemption – this requirement was effective as of September 1st, 2017.
- **Require health care providers (HCPs) to report to their local medical officer of health the record(s) of immunizations administered to children that protect against the nine designated diseases in the ISPA.**

Amendments to regulation 645 under the ISPA require HCPs to report immunizations for diseases specified under the ISPA directly to local medical officers of health have now been approved and will come into force on **July 1st, 2018**.

We have received only preliminary information about the implementation of this legislation from the province, and will not receive further information now until after the provincial election. As we receive new information, we will be sure to share it with HCPs via our various channels (posting to HC portal, vaccine inserts, via 8806 and via Healthfax as warranted).

While this legislation officially comes into effect July 1st, it is recognized there will be a transition period to work with HCPs regarding this requirement: as such, this requirement will not be actively enforced until a later date to be determined and communicated. We will continue to inform parents that they should report their children's immunizations to the Simcoe Muskoka District Health Unit until we have a fully functioning reporting system for HCPs.

EMR integration with the provincial immunization system, Panorama, is planned but timelines for when this will roll out have not yet been confirmed and will likely occur in a couple of years. Until this occurs, we intend to pursue a two pronged approach locally:

1. **Encourage HCPs to Obtain Access to “Immunization Connect Ontario (ICON) for HCP” for the purposes of reporting the ISPA immunizations, and for HCPs to be able access HCPs’ patients’ immunizations provided by other HCPs and Public Health**
 - While ICON for the public is live in our region, the ICON for HCPs is not yet live in the province. We have heard this will happen on/around July 1st.
 - ICON for HCPs will be accessed with HCPs eHealth “One ID” account (which you may already have to access digital health services such as the ConnectingOntario, ClinicalViewer, ClinicalConnect™ and the Ontario Telemedicine Network Hub).

- For those HCPs who are not currently registered for One ID, the MOHLTC is currently looking into batch registration. We anticipate more details on this after the election.
- HCPs who register to use ICON for HCPs, will be able to submit immunization information via this system (but it would mean double documenting as they would still need to document in their EMR). Most importantly, having access to ICON for HCPs will give the HCP access to their patient's immunization records that are in Panorama. This has long been a request of our local HCPs to have access to the immunizations we provide so this will accomplish that.

2. Establish Data Sharing Agreements with all Family Health Teams (FHTs) to receive batch uploads from EMRs

- We would like to continue to recruit all FHTs with a data sharing agreement like the one we have with Cottage Country FHT (CCFHT) and Algonquin FHT (AFHT). This will ease the reporting burden on HCPs and reduce the need for double documentation that would be required should HCPs chose to only report via ICON for HCPs.
- While we are aware of the 14 day timeframe for reporting in the revised legislation, our current data sharing agreements with CCFHT and AFHT are for quarterly reports. HCPs could report every 14 days, but we acknowledge this requires substantial resources and thus we will consider alternative arrangements.

We are committed to working with our local HCPs to implement this locally in as user friendly manner as possible.

Additional Resources

Immunization of School Pupils Act, R.S.O.
<https://www.ontario.ca/laws/statute/90i01>

Immunization of School Pupils Act, R.R.O. Regulation 645
<https://www.ontario.ca/laws/regulation/900645>

If you have questions please call the Simcoe Muskoka District Health Unit's Vaccine Preventable Disease Program at 705-721-7520 Ext. 8806 or toll free at 1-877-751-7520 Ext. 8806 Monday to Friday between 8:30 am - 4:30 pm.