

April 24, 2020

To:

Hon. Christine Elliott, Deputy Premier and Minister of Health
Hon. Tod Smith, Minister of Children, Community and Social Services

Cc:

Dr. David Williams, Chief Medical Officer of Health (MOH)
Helen Angus, Deputy Minister
Clint Shingler, Director, Health System Emergency Management Branch

Letter: **Ontario Needs a COVID-19 Plan for People in All Group Living Settings**

Pour la lettre en français, SVP appuyez [ici](#).

Dear Minister Elliott and Minister Smith,

Ontario's most recent COVID-19 modelling, released on April 20, suggests we have reached the pandemic peak. By all accounts this represents a provincial turning point. But **gains in slowing the spread of the virus are not equally felt or shared by all**. The terms "community spread" and "congregate settings" obscure important differences in how this virus is spreading inequitably, and limit our ability to target scarce community resources where they are most needed.

Provincial modelling shows the virus continuing to spread exponentially amongst elderly residents in long-term care (LTC). As a result, the province has belatedly embarked on a COVID-19 strategy for LTC. And while the term "congregate settings" has entered our lexicon, a fulsome response for other at-risk populations living in shared spaces – as well as highly mobile populations experiencing homelessness or using drugs – hasn't.

For people living on the margins of society – people living without housing, or in shelters; incarcerated and detained populations; people living with disabilities and in group homes; those staying in in-patient mental health facilities including residential addictions and withdrawal management; residential treatment programs for children and youth; frail seniors in assisted living; people from all populations living in supportive housing; women, children and gender diverse people experiencing homelessness or sheltering from domestic violence, (which is on the rise during this pandemic); people getting by in refugee shelters, seasonal migrant workers living in shared housing – there is no strategy to test, track, protect or prioritize, despite their similar conditions to LTC.

Far from slowing down, cases appear to be rapidly increasing amongst these populations and the increased risk of an outbreak is very real. As recently as April 20th, the Willowdale Shelter for refugees reported 74 confirmed cases. The Brampton Jail has closed its facility and transferred people detained there to the Toronto South Detention Centre. Across the province, shelters for people experiencing homelessness are reporting outbreaks.

We can't be sure of the full province-wide impact, because the province does not report on the details of COVID-19 outside of hospitals the way other provinces, such as Alberta,

do. For example, Ontario discloses how many tests have been completed, not how many people have been tested, which populations have been tested, or the settings in which new cases are appearing. **The lack of transparency obfuscates the true impact of this pandemic.** At the same time, the Chief Medical Officer of Health has not responded to calls to collect and use race-based and socio-demographic data; to prioritize personal protective equipment or on-site test kits for marginalized settings; or to consider wider preventive measures and screening for at-risk populations. Without provincial guidance, funding and leadership community organizations are unnecessarily operating in the dark to meet life-or-death needs.

Countries and regions that have successfully contained the pandemic have acted quickly to identify new cases early through widespread testing and targeting to key populations. They have also contained future outbreaks through contact tracing and providing support to people who test positive in isolating. Ontario must act now to expand access to COVID-19 testing for marginalized populations to prevent and contain outbreaks. **Without equitable interventions COVID-19's disproportionate impact on people living in congregate settings will continue to be felt.**

We urge the province to immediately address access-to-care gaps through the implementation of a provincial strategy for congregate and/or highly mobile settings. The province must act immediately to:

- 1.) Prioritize testing, including point-of-care test kits and testing of asymptomatic individuals, to facilitate COVID-19 containment and prevention amongst priority groups, including:
 - People experiencing homelessness
 - Highly mobile populations of people who use drugs
 - Populations in correctional and detention facilities
 - People living with disabilities and in group homes
 - Those staying in in-patient mental health facilities including residential addictions and withdrawal management and residential treatment programs for children and youth
 - Frail seniors in assisted living
 - People from all populations living in supportive housing
 - Women, children and gender diverse people experiencing homelessness or sheltering from domestic violence
 - People currently living in refugee shelters
 - Seasonal migrant workers living in shared housing facilities.
- 2.) Prioritize the distribution of personal protective equipment to each of the settings referenced above. and compensate organizations for pandemic-related costs
- 3.) Embed representatives from all these groups and sectors in formal COVID-19 planning tables including at the municipal, regional, and provincial levels.
- 4.) Report daily and publicly on the Ministry of Health's COVID-19 website the status of COVID-19 cases and fatalities in each of the settings referenced above, and provide updates on strategies and actions for these settings in daily Ministry Emergency Operations Centre calls.

- 5.) Extend Emergency Orders regarding staff working at a single facility, to all congregate living settings in the province. Ensure sufficient compensation for workers whose normal assignments will be disrupted. Ensure these workers can access adequate wages, benefits and working conditions to ensure this is possible for low-income workers.
- 6.) Put accountability mechanisms in place ensuring that COVID-19 prevention and containment mechanisms are appropriately implemented across facilities, including infection prevention and control.

The burden of disease is not equal. “Community spread” is uneven, and community-based organizations have been pleading for help and are operating in the dark without data, funds or plans to meet life-and-death needs. Current provincial responses take us further from containing this pandemic. We urge the province to act now to address this before we see the next wave of COVID-19 in these congregate settings.

Endorsed by 138 organizations and 400 individuals.

Addictions Mental Health Ontario	Centre Fancophone du Grand Toronto
Advancing Change Together	Centretown Community Health Centre
AdvantAge Ontario	Chatham-Kent Community Health Centres
Afro Canadian Caribbean Association	Chigamik Community Health Center
AIDS ACTON NOW!	Children's Aid Society of Toronto
AIDS Committee of Windsor	Children's Mental Health Ontario
Alliance for Healthier Communities	Chiu & Nathan Law
Alzheimer Society of Grey-Bruce	Choice In Health Clinic
Assisted Living Southwestern Ontario	Circle of Care
Baawaating Family Health Team	City for All Women Initiative (CAWI)
Belleville and Quinte West Community Health Centre	CMHA Toronto
Black Coalition for AIDS Prevention	Collaborative Aging
Black Creek Community Health Centre	Community Care Durham
Brock Community Health Centre	Community Health Centres of Northumberland
Brock Mission	Dale McMurchy Consulting
Cambridge Shelter Corporation	East End Community Health Center
CAMH	Eganville & District Seniors Needs Association
Canadian Centre for Accreditation	Elevate NWO
Canadian Centre for Victims of Torture	Elizabeth Fry Toronto
Canadian HIV/AIDS Legal Network	Family Service Toronto
Canadian Lawyers for International Human Rights (CLAHR)	Fraser Advocacy
Canadian Mental Health Association	Gateway Community Health Centre
CATIE	Grand Bend Area CHC
Central Community Health Centre	Guelph Community Health Centre
Centre de santé communautaire de Kapuskasing et région	Guelph Independent Living
Centre de santé communautaire de Timmins	Hamilton Centre for Civic Inclusion
	Hamilton Community Legal Clinic
	Health Providers Against Poverty (HPAP)

Health Zone Nurse Practitioner Led Clinic
HIV & AIDS Legal Clinic Ontario (HALCO)
ICAN - Independence Centre and Network
Inclusive Aging
Indus Community Services
International Federation on Ageing
Kemptville & District Home Support
LAMP Community Health Centre
Langs Community Health Centre
Laridae
Leading Youth for Empowerment (LYFE)
London InterCommunity Health Centre
Lumacare
Manitoulin Legal Clinic
March of Dimes Canada
MEALS ON WHEELS NIAGARA FALLS
ONT., INC.
MICBA Forum Italia Community Services
Millennial Womxn in Policy
Mino M'shki-ki Indigenous Health Team
MODC
Mrkich Law
Niagara Ina Grafton Gage Village
Noojmowin Teg Health Centre
North East Association for Community
Living
North Eastern Ontario Family and
Children's Services
North Lambton Community Health Centre
North York Seniors Centre
NorWest Community Health Centre
OCASI-Ontario Council of Agencies
Serving Immigrants
OMPC
Ontario Campaign 2000
Ontario Community Support Association
Ottawa Inner City Health Inc.
PARC
Parkdale Musicians Collective / PARC
Parkdale Queen West CHC
Partners In Health Canada
Peel Cheshire Homes Brampton
Peel Senior Link
Peterborough 360 Nurse-Practitioner-Led
Clinic
Peterborough AIDS Resource Network
Pinecrest Queensway CHC
Positive Change Toronto Initiative
Positive Living Niagara

Prism Analytics
Quantum Transformation Technologies
Quartz Promotion of Local Development
Reena
Regent Park Community Health Centre
Rwandan Canadian Healing Centre
Rwandan Community Abroad RCA-TO
Seaway Valley Community Health Centre
SHCHC
Sisters4Hope
Somerset West Community Health Centre
South Riverdale Community Health
Centre
Stonegate Community Health Centre
Street Health
Sudbury Community Legal Clinic
TAIBU Community Health Centre
The GenWell Project
The Neighbourhood Group Community
Services
The North Channel NPLC
The Vaugahn Community Health Centre
Thrive Group
Traverse Independence
United Jewish People's Order
United Mennonite Home for the Aged
Uzima Women Relief Group International
Vaughan Community Health Center
VHA Home HealthCare
Vibrant Healthcare Alliance
Vista Centre Brain Injury Services
Wahl Elder Law
WellFort Community Health Services
Wesley Hamilton
West Elgin Community Health Centre
Western Ottawa Community Resource
Centre
Windsor Essex Community Health Centre
WoodGreen Community Services
Writi Inc.
YES Shelter for Youth and Families
YMCA Hamilton
YMCA Peterborough Haliburton
YWCA Canada
YWCA Toronto