

**From:** [Gardner, Charles](#)  
**To:** [Moore, Kieran \(MOH\)](#)  
**Subject:** FW: [For Feedback] - COMOH Letter to the Minister of the Solicitor General re: risk reduction in provincial corrections facilities  
**Date:** October 21, 2021 4:29:17 PM  
**Attachments:** [image012.png](#)  
[image003.png](#)  
[image007.png](#)  
[image008.png](#)  
[image009.jpg](#)  
[image010.jpg](#)  
[image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[2021-10-19 - COMOH SOLGEN Outbreak Mitigation Letter - DRAFT.DOCX](#)

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**CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.**

Hello Kieran. I am sharing the email string below and its attached draft letter for consultation with you, possibly as an item for discussion when we meet tomorrow. The COMOH Executive is supportive of this being shared with you informally by email.

Thank you.

Sincerely,

**Dr. Charles Gardner, MD, CCFP, MHSc, FRCPC**

Medical Officer of Health and Chief Executive Officer

t: 705-721-7520 or 1-877-721-7520 x: 7219

e: [Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)

Simcoe Muskoka District Health Unit, 15 Sperling Dr, Barrie ON L4M 6K9

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**From:** Alexa Caturay <Alexa.Caturay@toronto.ca>

**Sent:** Wednesday, October 20, 2021 5:35 PM

**To:** Gardner, Charles <Charles.Gardner@smdhu.org>

**Subject:** Re: [For Feedback] - COMOH Letter to the Minister of the Solicitor General re: risk reduction in provincial corrections facilities

Thank you for facilitating the discussion.

I am in full support of this course of action.

Best,

A

Dr. Alexa Caturay

Associate Medical Officer of Health

Acting Associate Director  
Toronto Public Health

e: [Alexa.Caturay@toronto.ca](mailto:Alexa.Caturay@toronto.ca)

m: 416-400-6033

On Oct 20, 2021, at 17:33, Gardner, Charles <[Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)> wrote:

Alexa, based on the Forum meeting discussion today, I will share your letter and this email string with the COMOH Exec recommending that I submit your draft letter to Kieran for consultation, if that works for you. Please advise if this is okay.

Thank you

Sincerely,

**Dr. Charles Gardner, MD, CCFP, MHSc, FRCPC**

Medical Officer of Health and Chief Executive Officer

t: 705-721-7520 or 1-877-721-7520 x: 7219

e: [Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)

**Simcoe Muskoka District Health Unit**, 15 Sperling Dr, Barrie ON L4M 6K9

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<image007.png>

<image008.png>

<image009.jpg>

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**From:** Alexa Caturay <[Alexa.Caturay@toronto.ca](mailto:Alexa.Caturay@toronto.ca)>

**Sent:** Wednesday, October 20, 2021 12:52 PM

**To:** Gardner, Charles <[Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)>

**Cc:** 'Tran, Ninh' <[Ninh.Tran@hamilton.ca](mailto:Ninh.Tran@hamilton.ca)>; 'Kasmani, Azim'

<[Azim.Kasmani@niagararegion.ca](mailto:Azim.Kasmani@niagararegion.ca)>; Joyce Lock <[JLock@swpublichealth.ca](mailto:JLock@swpublichealth.ca)>;

'JLoo@algotmapublichealth.com' <[JLoo@algotmapublichealth.com](mailto:JLoo@algotmapublichealth.com)>; Susan Borden

<[Susan.Borden@toronto.ca](mailto:Susan.Borden@toronto.ca)>; 'Janet DeMille' <[Janet.DeMille@TBDHU.COM](mailto:Janet.DeMille@TBDHU.COM)>; 'Lobo,

Deepika' <[Deepika.Lobo@halton.ca](mailto:Deepika.Lobo@halton.ca)>

**Subject:** RE: [For Feedback] - COMOH Letter to the Minister of the Solicitor General re: risk reduction in provincial corrections facilities

That seems a very reasonable approach. Many thanks for your advice on this.

Talk soon.

Best,

A

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**From:** Gardner, Charles [<mailto:Charles.Gardner@smdhu.org>]  
**Sent:** October 20, 2021 08:47  
**To:** Alexa Caturay <[Alexa.Caturay@toronto.ca](mailto:Alexa.Caturay@toronto.ca)>  
**Cc:** 'Tran, Ninh' <[Ninh.Tran@hamilton.ca](mailto:Ninh.Tran@hamilton.ca)>; 'Kasmani, Azim' <[Azim.Kasmani@niagararegion.ca](mailto:Azim.Kasmani@niagararegion.ca)>; Joyce Lock <[JLock@swpublichealth.ca](mailto:JLock@swpublichealth.ca)>; 'JLoo@algotmapublichealth.com' <[JLoo@algotmapublichealth.com](mailto:JLoo@algotmapublichealth.com)>; Susan Borden <[Susan.Borden@toronto.ca](mailto:Susan.Borden@toronto.ca)>; 'Janet DeMille' <[Janet.DeMille@TBDHU.COM](mailto:Janet.DeMille@TBDHU.COM)>; 'Lobo, Deepika' <[Deepika.Lobo@halton.ca](mailto:Deepika.Lobo@halton.ca)>  
**Subject:** RE: [For Feedback] - COMO H Letter to the Minister of the Solicitor General re: risk reduction in provincial corrections facilities

Thank you for this, Alexa. I would welcome this on the agenda for the Forum today. You could email it as a draft on the COMO H listserv, however this runs the risk of broader circulation of a draft that we have not yet authorized (always a calculated risk, I admit as I have done this before). Perhaps it would be best to speak on its contents only, seeking a sense from the membership for its support for the contents. From there I would approach the COMO H Exec on it, and I would probably recommend to them that I share it as a draft by email to Kieran for his advise on how best to go forward with it (possibly as a formal letter to him as an alternative).

Please let me know if the above approach would work for you.

Thank you

Sincerely,

**Dr. Charles Gardner, MD, CCFP, MHSc, FRCPC**  
Medical Officer of Health and Chief Executive Officer  
t: 705-721-7520 or 1-877-721-7520 x: 7219  
e: [Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)

**Simcoe Muskoka District Health Unit**, 15 Sperling Dr, Barrie ON L4M 6K9

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<image010.jpg>

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**From:** Alexa Caturay <[Alexa.Caturay@toronto.ca](mailto:Alexa.Caturay@toronto.ca)>  
**Sent:** Tuesday, October 19, 2021 7:38 PM  
**To:** Gardner, Charles <[Charles.Gardner@smdhu.org](mailto:Charles.Gardner@smdhu.org)>  
**Cc:** 'Tran, Ninh' <[Ninh.Tran@hamilton.ca](mailto:Ninh.Tran@hamilton.ca)>; 'Kasmani, Azim' <[Azim.Kasmani@niagararegion.ca](mailto:Azim.Kasmani@niagararegion.ca)>; Joyce Lock <[JLock@swpublichealth.ca](mailto:JLock@swpublichealth.ca)>; 'JLoo@algotmapublichealth.com' <[JLoo@algotmapublichealth.com](mailto:JLoo@algotmapublichealth.com)>; Susan Borden <[Susan.Borden@toronto.ca](mailto:Susan.Borden@toronto.ca)>; 'Janet DeMille' <[Janet.DeMille@TBDHU.COM](mailto:Janet.DeMille@TBDHU.COM)>; 'Lobo,

Deepika' <[Deepika.Lobo@halton.ca](mailto:Deepika.Lobo@halton.ca)>

**Subject:** [For Feedback] - COMOH Letter to the Minister of the Solicitor General re: risk reduction in provincial corrections facilities

Good evening, Chuck.

I am writing with a draft letter to the Minister of the Solicitor General, crafted over many weeks of meeting with a small group regarding provincial corrections.

I would welcome your input as the COMOH Chair regarding next steps and timing. It is pertinent to my situation in Toronto, however I recognize that there may be other items to pursue tomorrow. Is this best brought to the membership at tomorrow's meeting, or held until a different time?

With thanks to those copied for chipping away at this over several months,

A

Alexa Caturay MD MPH CCFP FRCPC  
Associate Medical Officer of Health  
Acting Associate Director  
[City of Toronto](http://www.cityoftoronto.ca)

Office: 416-392-3246  
Cell: 416-400-6033  
Email: [Alexa.Caturay@toronto.ca](mailto:Alexa.Caturay@toronto.ca)

<image012.png>

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PROHIBITED. If you have received this communication in error please notify the sender at the above email address and delete this email immediately.  
Thank you.

Dear Minister Jones,

**Re: Recommendations from COMOH to the Ministry of the Solicitor General for Safer Operation of Provincial Corrections Facilities**

On behalf of the Council of Ontario Medical Officers of Health (COMOH), I am writing to provide a series of recommendations to support provincial correctional facilities in their ongoing operations.

These recommendations have been developed with collaborative input from local public health units with correctional facilities in their jurisdictions and have been reviewed and endorsed by [COMOH].

We hope that a timely decision can be made on these to allow for a collaborative implementation of these changes and the development of the associated programs, policies, and procedures.

Thank you for your consideration and we look forward to working with our provincial colleagues in support of improved health and safety within correctional institutions.

**Recommendations from COMOH to the Ministry of the Solicitor General for Safer Operation of Provincial Corrections Facilities.**

COMOH Recommends that Provincial Correctional facilities consider all available measures to mitigate risk among individuals living in highly exposed congregate settings. We recognize the efforts undertaken to date within challenging circumstances. Clarifying our collective roles now will serve those for whom we are charged with responsibility well in future. Local public health units are responsible for the management of communicable diseases and outbreaks, provision of infection prevention and control (IPAC) recommendations, and vaccination programs.

The following recommendations will mitigate the risk of introduction of COVID-19 into facilities, protect surrounding communities, provide reasonable infection prevention and control options, reduce the risk of spread in the event of an outbreak, and improve health outcomes for inmates and staff overall:

1. Implement mandatory vaccination policies for staff, visitors, contractors, and inmates.
  - Ensure that existing vaccination policies are implemented and enforced and establish policies where gaps exist, aligned with the balance of the Ontario Public Service
  - Develop practice to monitor vaccination coverage rates for first and second doses among staff and inmates on a weekly basis to guide efforts to provide ongoing vaccination opportunities
  - Provide vaccination coverage rates to the local public health unit in the event of a case investigation or outbreak to guide management
  - Ensure ongoing education and support for COVID-19 vaccination
2. Implement measures to reduce the risk of introduction of COVID-19 into facilities including:
  - Testing and isolation of individuals on admission or on transfer from other facilities, with a negative result available prior to release into the general population
  - Cohorting or isolation of individuals on admission or transfer into a facility, meaning anyone newly admitted would stay separately from the general population of the facility for a period of at least 10 days or longer as directed by the local public health unit
  - Ensuring sufficient and available quarantine and isolation space for anyone who is symptomatic or tests positive within a facility

- Not moving individuals from a range, wing, or unit in outbreak without prior consultation and approval from the local public health unit
  - Active screening of staff and visitors and exclusion of anyone who has a positive screening result
  - Cohorting of staff to an assigned range or unit to limit the potential introduction of COVID-19 to an entire facility
3. Implement measures to protect the communities which surround correctional facilities from the introduction of COVID-19, including:
    - Notification to the local public health unit should an individual who is meant to be in isolation, either someone with COVID-19 or someone who is a contact, is being released
    - Confirmation of forwarding contact information on release to ensure contact tracing is possible
    - Provision of documentation about isolation requirements to individuals who have COVID-19 or are contacts of people who have COVID-19 at the time of release with instructions to continue isolation until clearance date and to follow up with the receiving local public health unit
  4. Strengthen the infection prevention and control program in correctional facilities
    - Develop & implement an education program for staff, inmates, and visitors to deliver IPAC education on a continual basis, with Public Health Ontario's programming as the minimum standard
    - Develop an audit process for IPAC and provide audit reports to the local public health unit within 24 hours on request
    - Connect with a community of practice for IPAC to ensure best practice and skills maintenance
  5. Enhance case and outbreak management processes and protocols
    - Provide up to date copies of protocols in writing to local public health units
    - Identify cases and contacts in a timely manner, within 24 hours, to the local public health unit
    - Cohort staff and inmates to a unit, ward, or range in outbreak; ensure there is no cross-coverage for staff into other units or ranges and that no transfers of inmates to other units or ranges occur; increase the staffing complement as necessary to facilitate this
    - Provide testing at the direction of the local public health unit
    - Isolate individuals at the direction of the local public health unit
    - Implement infection prevention and control measures at the direction of the local public health unit
  6. Invest in infrastructure improvements
    - Consider HVAC upgrades
    - Use closed, contained spaces for intake units rather than open-bar cells
    - Consider the creation of space for individual isolation with contained units and single bathrooms where operationally feasible and safe

We believe these measures will have a demonstrable impact on the safety of provincial correctional facilities. Given the challenging nature of managing outbreaks once an exposure has occurred in these facilities, prevention and risk mitigation are a key priority in this vulnerable sector. Your support to accomplish this is appreciated.

Sincerely,

XX

Cc: Dr. Kieran Moore, CMOH  
Dr. Fiona Kouyoumdjian  
PHO  
Minister Elliott  
*Others PRN*