

December 18, 2020

Hon. Adrian Dix  
Minister of Health  
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Victoria, BC V8W 9E2  
[HLTH.Minister@gov.bc.ca](mailto:HLTH.Minister@gov.bc.ca)

Dr. Bonnie Henry  
Provincial Health Officer  
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Victoria, BC V8W 9P4  
[bonnie.henry@gov.bc.ca](mailto:bonnie.henry@gov.bc.ca)

Dear Minister Dix and Dr. Henry,

**RE: BC's COVID-19 Vaccine Distribution Strategy**

We write to you as a group of organizations in BC focused on the human rights of people with disabilities. We respectfully request your consideration of our suggestions regarding the priority of vulnerable people with disabilities in BC's COVID-19 Vaccination Strategy.

We understand that under BC's COVID-19 Vaccination Strategy, distribution will be prioritized first to the following groups:

- Long-term care residents and staff
- Health-care facility staff for COVID-19 patients in settings like Intensive Care Units, COVID-19 wards and emergency departments
- Indigenous people living in rural or remote communities
- High risk people living in group settings like shelters
- People over 80 years old

While not all people with disabilities will be at a heightened risk to contracting COVID-19, it is well documented that as a whole people with disabilities experience more severe outcomes and heightened rates of mortality from COVID-19.<sup>1</sup> People with disabilities are disproportionately represented among marginalized populations, including people living in poverty, people experiencing homelessness, or people detained in civil or carceral settings.

We know the Ministry of Health and the Office of the Provincial Health Officer are committed to ensuring that people with exceptional vulnerabilities are receiving priority access to the COVID-19 vaccine. To support that goal, we would like to draw your attention to two groups of people with disabilities that we would like to ensure are incorporated in BC's COVID-19 Vaccination Strategy.

We would like to ensure that the priority of long-term care (LTC) residents and staff be extended to those living and working in group homes and other home-based support service settings such as those funded by Community Living BC (CLBC) and the Choice in Supports for Independent Living (CSIL) programs. To do otherwise would be inconsistent with the approach that was taken to the distribution of pandemic pay, which correctly recognized the increased exposure in such settings.<sup>2</sup> We know from our

Province's current restrictions how exposure grows exponentially when "bubbles" expand to two, three, and beyond non-mutually overlapping households. Following those restrictions to the letter, however, remains impossible for those living and working in group homes and other home-based support services settings, who continue to be put at significantly increased risk every day. Further, there is myriad literature and documentation with respect to the significantly increased vulnerability and increased risk of hospitalization and death for those requiring such care.<sup>3</sup>

Further, we would like to ensure that people detained involuntarily under the *Mental Health Act* and health care providers working in psychiatric settings are also prioritized in the first wave of vaccine distribution. Involuntary mental health patients' vulnerability to COVID-19 is high, particularly in BC, which has the highest hospitalization rates in Canada due to mental illness and substance use.<sup>4</sup> Their conditions, ward/room placements, ability to physically distance, and psychiatric treatment are not within their control and multiple shifts of health care providers come in and out of psychiatric units and facilities. People with mental health-related disabilities are more likely to have negative health outcomes from COVID-19 because they are at above-average risk for physical health issues, including heart disease and chronic respiratory issues and some psychiatric medications may impair immune responses.<sup>5</sup>

We therefore would like to ensure that people living and working in these settings be included in the enumerated priorities to receive the first wave of vaccine distribution. Thank you for your consideration of our requests and we would be pleased to maintain open dialogue should you wish to seek further consultation from us.

Sincerely,

Disability Alliance BC  
Inclusion BC  
Family Support Institute of BC  
Burnaby Association for Community Inclusion  
Vela  
Individualized Funding Resource Centre  
UNITI  
Canadian Institute for Inclusion and Citizenship  
Health Justice  
Planned Lifetime Advocacy Network  
Plan Institute  
Spectrum Society for Community Living  
BC Parents of Complex Kids  
Kinsight  
Association of CSIL Employers

CC: John Horgan, Premier  
Nicholas Simons, Minister of Social Development and Poverty Reduction  
Sheila Malcolmson, Minister of Mental Health and Addictions

Stephen Brown, Deputy Minister of Health  
Mable Elmore, Parliamentary Secretary – Seniors' Services and Long-Term Care



THE UNIVERSITY OF BRITISH COLUMBIA

Canadian Institute for Inclusion and Citizenship



<sup>1</sup> Armitage & Nellums. *The COVID-19 response must be disability inclusive*. The Lancet. March 27, 2020. [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(20\)30076-1/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(20)30076-1/fulltext)

<sup>2</sup> *Temporary Pandemic Pay*. Government of British Columbia. Last Updated: December 14, 2020. <https://www2.gov.bc.ca/gov/content/safety/emergency-preparedness-response-recovery/covid-19-provincial-support/temporary-pandemic-pay#eligibility>

<sup>3</sup> For example, individuals with Down syndrome, who make up a significant portion of residents in group homes in BC, have been shown to be at a heightened risk of hospitalization and death from Covid-19, according to a UK study: Meridith Wadman. *COVID-19 is 10 times deadlier for people with Down syndrome, raising calls for early vaccination*. Science magazine. December 15, 2020. <https://www.sciencemag.org/news/2020/12/covid-19-10-times-deadlier-people-down-syndrome-raising-calls-early-vaccination>

<sup>4</sup> *A Pathway to Hope: A roadmap for making mental health and addictions care better for people in British Columbia*, British Columbia Ministry of Mental Health and Addictions, June 26, 2019, online: [https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/mental-health-and-addictions-strategy/bcmentalhealthroadmap\\_2019web-5.pdf](https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/mental-health-and-addictions-strategy/bcmentalhealthroadmap_2019web-5.pdf)

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<sup>5</sup> Nicole Kozloff, Benoit H Mulsant, Vicky Stergiopoulos, Aristotle N Voineskos, "The COVID-19 Global Pandemic: Implications for People With Schizophrenia and Related Disorders" 28 April 2020, *Schizophrenia Bulletin*, online:  
<https://academic.oup.com/schizophreniabulletin/advance-article/doi/10.1093/schbul/sbaa051/5826166>