

DRAFT: Letter to the Minister of Health

The Honourable Christine Elliott, Deputy Premier and
Minister of Health
Hepburn Block, 10th Floor
80 Grosvenor Street
Toronto, ON M7A 2C4

Dear Minister Elliott,

Thank you for the opportunity to provide feedback on behalf of City of Hamilton Public Health Services in response to the November 2019 *Discussion Paper: Public Health Modernization*ⁱ. We would like to commend you and your colleagues for taking a renewed approach to public health modernization that includes more extensive consultation across the province.

The contents of this letter represent the collective perspectives of City of Hamilton Public Health Services staff and the Board of Health. A review of relevant reports and correspondence from other organizations was also conducted to inform our response. We hope that you find the breadth and depth of the input provided to be of assistance as you consider next steps.

City of Hamilton Public Health Services recognizes and supports the need to modernize and strengthen Ontario’s public health system in order to achieve the following:

- Better consistency and equity of service delivery;
- Improved clarity and alignment of roles and responsibilities between the Province, Public Health Ontario and local public health;
- Better and deeper relationships with primary care and the broader health system; and,
- Improved public health delivery and system sustainability.

It is important to highlight the key role that the broad range of local public health programs – such as infectious disease control, physical activity promotion, food premise inspections, tobacco control, immunization, and healthy growth and development – play to keep people and our communities healthy, prevent disease and reduce health inequities and, as such, making important contributions toward the provincial government’s goal of eliminating “hallway medicine”.

For this reason, we strongly advocate that public health’s unique mandate to keep people and our communities healthy, prevent disease, and reduce health inequities be maintained. We also recommend there be a continued focus on the core functions of public health, including population health assessment and surveillance, promotion of health and wellness, disease prevention, health protection and emergency management and response.

To modernize and strengthen public health in Ontario, the City of Hamilton Public Health Services recommends that:

- The Province consider using a risk management approach to public health modernization to identify where the greatest capacity challenges are and focus on those first;
- It is strongly recommended that Hamilton Public Health Services remain as an organization within the City of Hamilton, and its jurisdiction remain the same – given that

it serves a good size population and has the support and strategic benefits of being amalgamated within the City;

- An overarching provincial public health system strategy be developed that clearly outlines the roles and responsibilities of the three entities that form Ontario’s public health system – the Ministry of Health, Public Health Ontario, and local public health units. Once the strategy has been implemented, the need for a regional level (in addition to the local and provincial levels) could be re-evaluated;
- Local public health remain at the community level. It is imperative that local public health services be responsive and tailored to the health needs and priorities of each local community, including those of vulnerable groups or those with specific needs such as the Indigenous community. Also, there is a need to maintain and work with community partners including health care system partners at the community level;
- Ontario’s public health system remain financially and administratively separate and distinct from the health care system;
- Any changes to the public health system leverage and build on the strong partnerships and collaborations that currently exist. Engaged and empowered communities and stakeholders are essential for public health. Local public health units are best positioned to lead strategic community partnerships with municipalities, school boards, health care organizations, community agencies and residents;
- Local governance have strong accountability and leadership on community issues and that boards of health have proportionate representation to the communities they serve;
- Local public health senior and medical leadership is maintained to provide advice to municipal councils on public health issues and participate in strategic community partnerships;
- Sufficient funding and human resources to fulfill public health’s unique mandate be ensured. Mechanisms must be included to ensure that the total funding envelope is stable, predictable, and protected for the full delivery of all public health programs and services;
- The Ministry of Health and Public Health Ontario take on a stronger leadership role in the following areas:
 - Development of policies and strategies (especially related to health promotion and disease prevention) that include delineation of provincial and local roles and responsibilities, and include measurable goals;
 - Development of a digital health strategy that includes data standardization and interoperability of digital health solutions (e.g., electronic medical records) across both the public health system and the broader health system;
 - Development of health promotion messaging, campaigns, and social marketing with complementary local campaigns where appropriate;
 - Evidence reviews/synthesis and library services;
 - Development of a research agenda to inform best practice standards and evidence-informed strategies in collaboration with Ontario’s post-secondary institutions and research institutes;
 - Coordination with other provincial ministries to ensure public health programs and services are planned and delivered more efficiently; and,
 - Competency development and capacity building (e.g., Indigenous cultural competency training).

City of Hamilton Public Health Services would be willing to reallocate relevant resources either permanently and/or through secondments to support implementation of new roles or central functions at the provincial level. Secondments would help build competency of local public health staff and promote a stronger connection between provincial and local public health agencies; and,

- Public Health Ontario and local public health units have distinct and complementary roles with respect to population health assessment, epidemiology, and evaluation. Public Health Ontario should provide scientific and technical expertise and conduct provincial-level analysis to support local public health units with the identification of priority populations and health needs. It is imperative that epidemiological capacity be maintained at local public health unit level in order to conduct local population health assessment and determine how best to execute provincial priorities and respond to local health issues within the community.

Further feedback and additional perspectives related to the key challenges raised in the discussion paper are provided below.

Insufficient Capacity

As noted in *Discussion Paper: Public Health Modernization*ⁱ, “...the capacity of health units varies significantly across the province”. Implementing a one size fits all approach such as regionalization of all public health units (including those who currently have sufficient capacity) would not be an effective way to address this variability. Instead, the Province should consider using a risk management approach to public health modernization to identify where the greatest capacity challenges are and focus on those first (e.g., merging smaller health units or other areas identified through audits or health units themselves). Any amalgamation of existing public health units must be predicated on evidence-based conclusions that it will demonstrably improve the capacity to deliver public health programs and services to the residents of that area.

It is strongly recommended that the City of Hamilton Public Health Services and its jurisdiction remain the same – it serves a good size population and is a good size organization. Furthermore, the City of Hamilton currently has sufficient capacity to carry out public health functions locally. There is also value in being part of a municipality in that significant legal and administrative support is provided and surge capacity is available for emergency response. Being embedded within a municipality has afforded the opportunity to work with other City departments (e.g., public works, by-law enforcement, planning & economic development) to build stronger relationships, streamline services, and provide wrap-around supports for clients.

Strong and effective accountability mechanisms at both the provincial and local level, including an integrated performance monitoring framework (e.g., accreditation, accountability, performance measurement) are critical to identifying and addressing insufficient capacity or other challenges. Strengthening accountability supports a culture of continuous quality improvement and ensures health units are performing appropriately.

Increased support from the Province and Public Health Ontario in specific areas could also be used to bolster capacity among public health units who currently have an insufficient amount. Examples of functions that would benefit from increased provincial support and stronger leadership are outlined in the section below.

Duplication of Efforts

Preservation of strong provincial and local roles coupled with effective leadership is essential for a robust public health system. Clarifying roles and responsibilities of the Ministry of Health, Public Health Ontario, and local public health units would reduce duplication. For example, within the Healthy Communities work, there are levers to improve both the provincial and local roles. The Province should focus on providing support through legislation, policy development, and the provision of funding, while the local level leads collaboration with community stakeholders (e.g., municipalities, school boards, etc.) to implement provincial strategies within the local context. It is often easier for public health units situated within municipal organizations to impact and influence levers at the local level due to their unique position. It is recommended that both provincial and local roles be preserved in a manner that maintains and fosters innovation, effective leadership, and responsiveness to diversity across the system.

To further reduce duplication, Public Health Ontario and local public health units should have distinct and complementary roles with respect to population health assessment, epidemiology, and evaluation. Public Health Ontario should provide scientific and technical expertise and conduct provincial-level analysis to support local public health units with the identification of priority populations and health needs. It is imperative that epidemiological capacity be maintained at local public health unit level in order to conduct local population health assessment and determine how best to execute provincial priorities within the community.

Stronger leadership and centralized support from the Ministry of Health and Public Health Ontario in the following areas is required to reduce duplication and increase consistency:

- Development of policies and comprehensive strategies for provincial priority areas that leverage multiple levels of actions for specific health issues as recommended in the *2017 Ontario Auditor General Report*ⁱⁱ and the *2019 Standing Committee on Public Accounts Report*ⁱⁱⁱ;
- Development of a digital health strategy that uses a standardized approach to data and information governance including common data standards and interoperability of digital health solutions (e.g., electronic medical records) across the public health system and broader health system;
- Investment in common digital solutions and applications to facilitate data-sharing, increase accessibility, enhance data quality and meet the demand for real-time information;
- Development of health promotion messaging, campaigns, and social marketing (e.g., Healthy Smiles Ontario) with complementary local campaigns where appropriate;
- Evidence reviews/synthesis and library services;
- Development of a research agenda with priorities and timelines to inform best practice standards and evidence-informed strategies in collaboration with post-secondary and research institutions across the province to leverage their substantial capacity;
- Coordination with other provincial ministries to ensure public health programs and services are planned and delivered in a more efficient and integrated manner; and,
- Competency development and capacity building (e.g., Indigenous cultural competency training) that is aligned with the principles of adult learning including workshops and conferences as well as provincial task forces and secondments to the Ministry of Health or Public Health Ontario.

Front-line services that work to implement provincial directions in ways that meet the needs of the community should remain at the local public health level. Examples include (but are not limited to) clinic services, dental programs, collaboration with schools and school boards on healthy school programming such as that to improve physical activity and nutrition, emergency response, collaboration with local planners on healthy community design and health inspections. Public health staff at the local level have a deep understanding of the community context in which they work, enabling them to respond quickly and appropriately to local needs and emerging issues.

Overall, increased communication and transparency with regards to what is being done at both the provincial and local levels (e.g. evidence reviews, pilot projects, data collection, etc.) would further reduce duplication and promote a coordinated approach.

Misalignment of Health, Social, and Other Services

City of Hamilton Public Health Services has a rich history of community collaboration, working together with larger health, social services, and education sectors, as well as NGO's/not for profits in our City on initiatives to improve health outcomes and health equity. Hamilton Public Health has longstanding connections with FHT, primary care, acute care hospitals, post-secondary institutions, McMaster Department of Family Medicine, school boards, early years sector, municipalities, social services, and the business community.

Most recently, the Hamilton Health Team was established bringing over 20 health and social service partners to the same table. Local public health has a role to play to collaborate with the Ontario Health Teams in their jurisdiction. Making drastic changes to public health at this time, such as regionalization, would create further barriers to effective collaboration. If the Hamilton Health Team were to carry on without strong public health representation, opportunities to inform system planning, encourage and collaborate on disease prevention and health promotion, and ensure alignment of services would be weakened if not lost. Especially important is the shared focus on health equity and chronic diseases.

There is also a need to increase alignment of health, social, and other services at the provincial level. Clarity of roles and better coordination among provincial ministries would help ensure that public health programs are delivered in a more efficient, streamlined manner. For example, the Ministry of Health should work collaboratively with the Ministry of Education, and the Ministry of Children, Community and Social Services to coordinate the planning, development, and delivery of programs for children and youth.

Inconsistent Priority Setting

The Province is uniquely positioned to enable shared and consistent priority setting across the public health system. Robust local data is needed to drive priority setting at both the provincial and local level. The Province could play a crucial role in collaborating and coordinating with other sectors such as police, emergency services, and hospitals to increase data sharing. The creation of provincial data platforms that are standardized and more accessible would help ensure data is provided in a timely manner for decision-making and ongoing monitoring. Standardization of evidence-based approaches, strategies, tools and methods with the ability to tailor at the local level would also support consistent priority setting.

From a local governance perspective, strong accountability and leadership on local public health issues is essential. In addition, representation on boards of health should be proportionate to

the community it serves. If the Province were to go ahead with making all boards of health special purpose bodies to increase consistency in government structure for local public health, the following principles should be applied:

- Boards of health should have representation that is proportionate to the community it serves;
- Boards of health should have the latitude to make independent decisions based on community needs within the *Ontario Public Health Standards* and expectations; and,
- Boards of health should continue working in collaboration with the health care system while remaining financially and administratively separate and distinct.

Indigenous and First Nation Communities

In keeping with the principles of respect, trust, self-determination, and commitment – “*Nothing about us without us*” – we reached out to the Indigenous community in Hamilton to gather feedback about how best to strengthen relationships between local public health and Indigenous communities. A key theme throughout this consultation was that Indigenous communities want to be empowered and resourced to implement public health initiatives themselves, with support from public health units as they determine, as opposed to local public health units doing this work. Provincial legislative changes are required to make this a reality.

Collaboration between the City of Hamilton Public Health Services and local Indigenous communities has evolved over the past few years. Hiring an Indigenous Health Strategy Specialist who is an Indigenous person has been critical for establishing and supporting these relationships and building trust. To advance this work further, it is recommended that additional Indigenous people be hired.

Local public health units should work alongside Indigenous communities to develop positive and meaningful relationships and advocate for support and education to create a healthy community for Indigenous people. Understanding and incorporating Indigenous Traditional Knowledge is essential. Spiritual health is as important as mental health; a wholistic model of healing recognizes this. It is also imperative that the principles of respect, trust, self-determination, and commitment be respected and incorporated into all of the work.

Special consideration will need to be given to the effects of any proposed organizational change on Ontario’s many Indigenous communities. Opportunities to further improve these relationships must be explored as part of the public health modernization process.

Francophone Communities

In the City of Hamilton, hiring bilingual staff who have the ability to engage with the Francophone community and partners has been important in the planning, delivery, and evaluation of public health services. The availability of French resources, auditory interpretation services, and translation services (funded by the Ministry of Health) has also enabled staff to deliver services to Francophone populations within Hamilton. To better meet the needs of this population, the following areas for improvement were identified:

- Increasing the number of bilingual employees, assessing appropriate resource requirements to meet the needs of the population;
- Continuing to grow intentional and collaborative engagement with the Francophone community to identify gaps in service and program planning;

- Continuing to consider local Francophone needs and voices to inform local decisions for services; and,
- Increasing Ministry involvement in translation services including facilitation of reliable and accurate software translation tools.

Transition and Modernization Considerations

All changes resulting from public health modernization must serve the goal of strengthening the Ontario public health system’s capacity to improve population health in all of Ontario’s communities through the effective and efficient local delivery of evidence-based public health programs and services. In addition, any new organizational structure must build on the current strong collaborative relationships among the public health agencies and the assets of current local boards of health.

A thoughtful, deliberative approach that includes good change management practices, while ensuring ongoing service delivery should be used when carrying out any future transitions. Provincial supports (e.g., financial, legal, administrative) must be provided to assist existing local public health agencies in their transition to any new state without interruption to front-line services.

Questions for Consideration

1. What are the roles of the three public health entities (the Ministry of Health, Public Health Ontario, and local public health units) with respect to the Ontario Health Teams? Are there clinical services that should be integrated with the Ontario Health Teams (e.g., sexual health, vision screening, etc.)?
 - It is important to work together with Ontario Health Teams to understand the state of the population’s health (i.e., population health assessment) while working together on shared priorities.
2. What is the delineation of roles and responsibilities between the Ministry of the Environment, Conservation and Parks and public health at both the provincial and local level?
 - Local public health does not currently have sufficient capacity to engage in work that is not currently part of the public health mandate and is not focused on human health. If there is a desire for local public health to take on more of this work, including work that relates to the health of the environment, there needs to be a deliberate conversation regarding roles and resource requirements.
3. Is the Province willing to lead policy and strategy development with respect to land use planning and public health?
 - Land use planning is a significant area of work with opportunities for public health.

For the health of our population, it is critical that public health continue to have a population health mandate, remain at the local level, and continue to be empowered to work with all sectors and partners that influence health to enable cross-sector collaboration to promote, prevent, and protect health.

We look forward to working with you to modernize and strengthen public health in Ontario to improve the health of all Ontarians.

Sincerely,

Fred Eisenberger
Mayor

(on behalf of the Board of Health, City of Hamilton)

CC: Dr. Elizabeth Richardson, Medical Officer of Health, City of Hamilton

ⁱ Ministry of Health. (2015). *Discussion Paper: Public Health Modernization*. Retrieved from:

http://health.gov.on.ca/en/pro/programs/phehs_consultations/docs/dp_public_health_modernization.pdf

ⁱⁱ Office of the Auditor General of Ontario. (2017). Public Health: Chronic Disease Prevention. *Annual Report 2017*. Retrieved from: http://www.auditor.on.ca/en/content/annualreports/arreports/en17/2017AR_v1_en_web.pdf.

ⁱⁱⁱ Standing Committee on Public Accounts. (2019). *Public Health: Chronic Disease Prevention*. Retrieved from: https://www.ola.org/sites/default/files/node-files/committee/report/pdf/2019/2019-11/42_1_PA_Public%20Health_28102019_en.pdf