

November 29, 2021

Ms. Jen Simon
Manager, Capital Projects
Ontario Ministry of Health
4th Floor, 438 University Ave
Toronto, ON M7A 1N3

Jen.simon@ontario.ca

Dear Ms. Simon:

Re: Ontario Ministry of Health - New Mandated Technologies

Infection Prevention and Control Canada (IPAC Canada) is a national organization representing 1700 professionals engaged in the prevention and control of infections (IPAC). IPAC Canada's priorities include supporting the development of standardized, effective, and evidence based IPAC practices and to promote infection prevention and control research all healthcare settings.

IPAC Canada is aware that the Ontario Ministry of Health (MOH) now requires several new technologies for Ministry funded healthcare construction and renovation projects. These technologies include the use of automatic disinfectant UV-C lights within the care environment, UV-GI lights in central air systems, the promotion of appropriate hand hygiene and scrub sink designs, and the requirement to use ozonated water in select fixture types. We commend the Ministry's interest and support of new technologies that may help to prevent healthcare acquired infections (HAIs).

IPAC Canada strongly supports the development, evaluation, and incorporation of evidence-based design requirements into healthcare design standards. Mandating these technologies directly impacts initial capital investment requirements and will result in ongoing costs associated with implementation, parts, and maintenance, without which these technologies will not continue to function properly.

Some of these directives have been supported by infection control best practices and literature for many years. These include ensuring hand hygiene sinks are programmed in accordance with CSA Z8000 and opting for hard partitions instead of cloth curtains to minimize risk of transmission of microorganisms and HAIs. However, while some of the other mandated technologies certainly show promise, definitive supporting evidence demonstrating reduction in HAIs has not yet been demonstrated or published. IPAC Canada's Healthcare Facility Design and Construction Interest Group, representing almost 400 professionals interested in healthcare design, construction, renovation, and maintenance across the country, would appreciate an opportunity to review and understand the evidence used and consultation completed when the MOH decided upon these requirements.

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IPAC Canada believes in fostering strong partnerships with national, provincial, and local organizations in order to advance its goals, ultimately aimed at protecting the health and safety of all Canadians. The current pandemic has provided many opportunities to work collaboratively with organizations across Canada to support healthcare settings in their response to COVID-19. IPAC Canada is here to support such work and is available and ready to discuss new and evolving technologies with the Ontario MOH. Working together on this initiative can benefit the MOH and infection control professionals across the province to engage the support of others and advance discussions regarding the importance of incorporating infection prevention and control design principles throughout all healthcare settings.

Thank you for your consideration.

Regards,



Zahir Hirji (he/him) RN BScN MHSc CIPP/c CIC
President

Copy: Donna Diakun, Project Manager, Capital Projects, Ontario Ministry of Health
Barbara Shea, Chair, Healthcare Facility Design & Construction Interest Group
Jessica Fullerton, CoChair, Healthcare Facility Design & Construction Interest Group
Christine Moussa, Secretary, Healthcare Facility Design & Construction Interest Group
Gerry Hansen, Executive Director, IPAC Canada