

The Honourable Tyler Shandro  
Minister of Health  
423 Legislature Building  
10800 97 Avenue  
Edmonton AB T5K 2B6

January 11, 2021

EZMSA Office  
Suite 201 12315 Stony Plain Road NW  
Edmonton, AB  
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Dear Minister Shandro:

**Re: Alberta's Pandemic Vaccination Plan**

The Edmonton Zone Medical Staff Association is writing to inform you of concerns compiled by our Strategic COVID-19 Pandemic Committee which have been raised in the medical community regarding Alberta's Pandemic Vaccination Plan- specifically the proposed Alberta COVID-19 vaccination rollout and the vaccination priority list.

Open, ethical, and evidence-based prioritizing of immunizations

One major concern is the absence of an open, ethical, evidence-based, and transparent process for determining the priority of Albertans to be immunized. For instance, a previous mistake was rectified with staff who work in COVID-19 units promoted to Phase 1a last week; however, how and why this occurred and how other groups can have their priority reassessed is completely opaque.

Two additional groups (Emergency Medical Technician employees and Office of the Chief Medical Examiner [OCME] investigators) share many or all of the same risk factors for COVID-19 transmission including:

- multiple exposures to people who are known to be or may be potentially infectious for COVID-19;
- significant durations of exposure;
- exposure early in the course when cases are most infectious;
- working in small, enclosed spaces with inadequate ventilation; and
- performing procedures that can generate aerosols.



The Committee recommends:

- The following groups should be elevated to Phase 1a:
  - all personnel working in ground or air ambulances;
  - all investigators (20-30 individuals total) working for the OCME who attend multiple death scenes per day in high-risk health care settings (e.g. COVID-19 wards, emergency departments) and community settings (e.g. shelters, group homes).
- Alberta Health make public the priority process/criteria for immunization assignment and the appeals process to have these assignments reconsidered.

#### Alberta Community Vaccination needs to be complete earlier

The rollout of the COVID-19 vaccine provides unprecedented challenges in obtaining adequate supplies, storing, and transporting some of the vaccines as well as immunizing enough individuals to achieve sufficient herd immunity in the population (or to satisfy expected demand). The current Alberta strategy is not to begin immunization of the general public until the fall of 2021. This is significantly later than most other provinces and the federal government recommendations.

The current Alberta timeline increases the risk of another wave of cases in fall 2021, with the return to in-person learning in schools and the general population moving activities inside due to colder weather. This will result in continued stress on the healthcare system. Additionally, a late vaccine rollout will damage the economy as longer periods of restrictions will be required.

We strongly recommend that the timeline be modified to complete all immunizations by August 31, 2021 and that the resources to achieve that goal be allocated now.

#### The Alberta Immunization Strategy needs to be transparent

While recognizing that the timing for supply of vaccines remain unclear, we are intensely concerned that, in contrast to other provinces, Alberta does not have a transparent protocol for administering COVID-19 vaccines to the population once the needed supplies have been obtained. The math is daunting. Assuming the Alberta government plans to immunize the 3.5 million adults in the province with 2 doses of vaccine, it will require a vaccination rate of approximately 29,000/day to complete the task by the end of August 2021.

We believe that Alberta Health must provide to the public a comprehensive strategy and operational plan to achieve immunization of the high-risk groups and general population by August 31, 2021.

The operational plan should include:

- the vaccines that have been ordered, the amounts of each, and the scheduled delivery dates;
- timelines for high-risk groups on which each group will begin immunization, including the estimated numbers in that group, the sequence, and dates;
- the settings and locations in which vaccinations will be delivered by Alberta Health Services and other providers; and
- a communications plan for explicit and regular reports for the progress achieved to the general public.



The failure to make a comprehensive strategy and operational plan available to Albertans encourages the likelihood of misunderstanding, misinformation, and confusion. It will also increase the risk that the process is seen to be unfair, poorly planned, disorganized, and/or ineffective. Building and maintaining the confidence of Albertans in the immunization strategy is vital to its success in achieving herd immunity, decreasing illness, reducing the number of deaths, and protecting the economy.

We thank you for taking the time to receive our concerns and we look forward to your response.

Sincerely,

Dr. Erika MacIntyre  
President, Edmonton Zone Medical Staff Association

AF/bjh

CC: Lorna Rosen, Deputy Minister, Alberta Health  
Dr. Deena Hinshaw, Chief Medical Officer of Health, Alberta Health  
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