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Ms. Lisa Lapointe
Chief Coroner
Ministry of Public Safety and Solicitor General
PO Box 9259 Stn Prov Govt
Victoria BC V8W 9J4

Dear Ms. Lapointe:

My apologies for the delayed response to your letter regarding the Coroner's Inquest into the death of Mr. Brandon Juhani Jansen. Please be assured the recommendations have been reviewed by the Ministry and work is underway to support implementation.

The Ministry of Health (the Ministry) works in partnership with the health authorities, Ministry of Mental Health and Addictions (MMHA) and other social Ministries such as the Ministry of Children and Family Development to provide stewardship for the delivery of Mental Health and Substance Use services in the province.

The Jury's recommendations have been reviewed by the Ministry, and relevant recommendations have been shared with the Chief Executive Officers (CEOs) of the Regional Health Authorities (HAs). The Ministry's response is outlined below.

Jury Recommendation #1:

Develop specific substance use treatment facility regulations under the *Community Care and Assisted Living Act*, including with respect to educational qualifications for persons working in such facilities.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation.

The Ministry has convened a working group to review the regulations and gather input on appropriate regulatory protections. The process from first review of existing regulations to legislation and regulation change will take a year or more to complete.

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Jury Recommendation #2:

Ensure free opioid maintenance drugs in the community for people leaving correction centres.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation for individuals eligible under PharmaCare Plan C and Plan G.

As of October 1, 2017, the Ministry, via the Provincial Health Services Authority (PHSA), is responsible for the delivery of health services, including mental health and substance use (MHSU) services, for inmates in correctional centers operated by the Ministry of Public Safety and Solicitor General. The PHSA will be working with regional health authorities and community stakeholders to ensure access to appropriate MHSU services for people leaving corrections centers, including access to opioid maintenance drugs. Opioid maintenance drugs are available via PharmaCare. PharmaCare covers the following drugs as treatment for opioid addiction:

- Methadone™ for maintenance
- Buprenorphine/naloxone (Suboxone® and generics)
- Kadian® 24-hour slow release oral morphine (under certain conditions)

PharmaCare covers these medications under the income-based Fair PharmaCare plan. It also provides 100% coverage under PharmaCare Plan C (for people on Income Assistance) and Plan G (Free Psychiatric and Substance Use Medications).

Jury Recommendation #3:

Review the need for increasing the number of supervised consumption sites rather than overdose prevention sites.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation.

The Ministry recognizes the need for supervised consumption and overdose prevention services as essential health sector interventions in response to the public health emergency. Health Canada has provided exemptions under Section 56 of the *Controlled Drugs and Substances Act* for nine supervised consumption sites (3 in Vancouver, 2 in Surrey, 2 in Victoria and 1 each in Kamloops and Kelowna). Health Canada is currently reviewing an application for a proposed site in Vancouver. In December 2016, the BC Minister of Health issued Ministerial Order M488 under the authority of section 5.2 of the *Emergency Health Services Act* and section 7.1 of the *Health Authorities Act* that allowed for the establishment of overdose prevention services. Overdose prevention services allow people to use drugs in a monitored setting with someone present to respond should an overdose occur. At present, there are 45 overdose prevention sites operating in British Columbia.

Jury Recommendation #4:

Explore options to create a shared database for the treatment of substance abuse to include medical, criminal and substance abuse treatment records.

Ministry of Health RESPONSE:

The Ministry does not accept this recommendation.

The recommendation is rejected on the basis that it is not considered appropriate for treatment facilities to have access to all client medical and criminal records, nor is it considered necessary for the delivery of appropriate and safe care. A shared database does not replace the need for client consent to share their personal information.

Jury Recommendation #5:

Explore options for critical incident information sharing with respect to unexpected deaths in substance use facilities among licensees and Health Authorities with the goal of enhancing client safety and risk prevention.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation.

The Ministry's Community Care Licensing unit will work in consultation with the Health Authority Regional Managers of Licensing to implement the recommendation.

Jury Recommendation #6:

Develop standards of practice for treating persons with opioid addictions.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation

In collaboration with the British Columbia Centre on Substance Use, The Ministry released "The Clinical Management of Opioid Use Disorder" on February 7, 2017.

Jury Recommendation #7:

Provide, develop and improve adolescent substance abuse treatment facilities.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation

The Ministry is working with health authorities to implement:

- 20 new intensive residential substance use treatment beds for youth age 13-18 years in response to the opioid overdose crisis; and,
- new highly specialized substance use treatment services for young people, which will provide the highest level of substance use care available in the province.

Jury Recommendation #8 to the Ministry of Health and CEOs of Regional Health

Authorities:

Consult with persons with lived experience with substance use dependency in policy and program development.

Ministry of Health RESPONSE:

The Ministry accepts this recommendation

The Ministries of Health, Mental Health and Addictions and the Health Authorities engage people with lived experience in the policy and program development process through a variety of strategies and tables:

- The Drug Overdose and Alert Partnership (DOAIP) and Life Experts for Inclusive Collaborative Action (LEICA)
- The Provincial Harm Reduction Strategies and Services Committee (HRSS)
- Patients as Partners (PasP)
- Patient Quality Health Council Patient Voices Network
- BC Service Design Team partnership and engagement with people with lived experience on a project to compile and learn from stories and ideas about addiction in BC.
- An Early Action Plan consultation session was conducted on October 11, 2017, and included people with lived experience to identify early actions to address mental health and addictions, and provide building blocks to the broader, longer term strategy.

The Overdose Prevention and Response Treatment Task Group includes representation from individuals with lived experience who are contributing to developing the response to the opioid overdose crisis. In partnership with the BC Patient Safety Quality Council and the First Nations Health Authority, the task group has held two journey mapping sessions to learn from the perspectives of people with lived experience and inform the ongoing treatment response to the overdose emergency.

Health Authorities also engage people with lived experience in their work through established advisory committee structures.

The Ministry accepts, and will take action to support the following recommendations directed to the CEOs of Regional Health Authorities:

Jury Recommendation #10 to the CEOs of Regional Health Authorities:

Require all substance use treatment programs to report back to Health Authorities on client outcomes.

Ministry of Health RESPONSE:

The Ministry accepts the recommendation

The Ministry will include in policy the requirement for Health Authorities to track outcomes of individuals receiving treatment from Health Authorities delivered services, as well as their contracted services.

Jury Recommendation #11 to the CEOs of Regional Health Authorities:

Provide opioid dependent users ready access to opioid replacement interventions.

Ministry of Health RESPONSE:

The Ministry accepts the recommendation

A number of activities are underway under the response to the overdose epidemic and Public Health Emergency including:

- coverage for opioid substitution therapies under Plan G, the Psychiatric Medications Plan available to BC residents of any age who demonstrate clinical and financial need;
- release of the Guideline for the Clinical Management of Opioid Use Disorder Treatment;
- development and release of a range of interdisciplinary addictions medicine training and educational resources through the BC Centre on Substance Use;
- scaling up rapid access to OAT within health authorities.

Jury Recommendation #12 to the CEOs of Regional Health Authorities:

Expand diacetylmorphine and hydromorphone treatment programs for chronic opioid users.

Ministry of Health RESPONSE:

The Ministry accepts the recommendation

The Ministry is working with Health Canada to make diacetylmorphine available to provinces, and is expanding access to injectable hydromorphone treatment for opioid use disorder in the province.

- On October 10, 2017, the Province released a clinical guidance document developed by the BC Centre on Substance Use that provides guidance for health authorities and health care providers on the safe, effective use of injectable hydromorphone in the treatment of opioid addiction.¹
- In May 2017, the Ministry directed Providence Health, Vancouver Coastal Health, and Fraser Health Authorities to expand capacity to provide injectable hydromorphone treatment to 100 additional patients in Vancouver and 50 patients in Surrey.
- Other regional health authorities submitted plans for injectable hydromorphone treatment at the end of October 2017 and the Ministry is working with them to implement their plans.

Jury Recommendations #19 to CEO, all Licensed Substance Use Treatment Centers:

Review guidelines regarding cell phone/electronic device policies.

Ministry of Health RESPONSE:

The Ministry accepts the recommendation

The Ministry will consider the recommendation as it relates to the review of the Residential Care Regulation.

Jury Recommendations # 20 to CEO, all Licensed Substance Use Treatment Centers:

Ensure all baggage is searched on entering the facility including clients and visitors.

Ministry of Health RESPONSE:

The Ministry accepts the recommendation

The Ministry will consider the recommendation as it relates to the review of the Residential Care Regulation.

Jury Recommendations #21 to CEOs of all Licensed Substance Use Treatment Centers:

Consider greater security measures for monitoring clients and visitors.

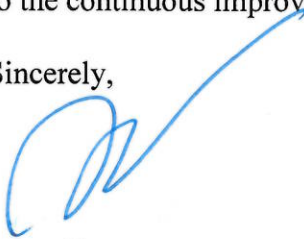
Ministry of Health RESPONSE:

The Ministry accepts the recommendation

The Ministry will consider the recommendation as it relates to the review of the Residential Care Regulation.

Thank you for providing the Ministry of Health with the opportunity to respond to these recommendations. I trust this information will assure you that the Province of BC is committed to the continuous improvement of substance use treatment services.

Sincerely,



Steve Brown
Deputy Minister

¹ British Columbia Centre on Substance Use. (2017). *Provincial guidelines for injectable opioid treatments released*. Retrieved from <https://www.bccsu.ca/news-release/provincial-guidelines-for-injectable-opioid-treatments-released/> on October 24, 2017.