August 8, 2018

VIA EMAIL (ChiefCoronerCorrespondence@gov.bc.ca)

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

Dear Ms. Lapointe:

On March 28, 2018, the BC Coroners Service (BCCS) released a Death Panel Review of illicit drug overdoses in BC. The panel reviewed the circumstances of 1,854 people who died of an illicit drug overdose between January 1, 2016 and July 31, 2017. The panel report contained specific recommendations and priority actions within three areas to reduce the number of overdose deaths in the future:

1. Ensure Accountability for the Substance Use System of Care  
2. Expand Opioid Agonist Treatment and Assessment of Substance Use Disorders  
3. Expand Drug Use Safety Option

While deaths and injuries from overdoses have had tragic impacts across BC, the overdose crisis has impacted First Nations at a disproportionate rate compared to other populations. Although most of the recommendations contained within the Panel’s review were directed to the Province, the First Nations Health Authority (FNHA) supports the Panel’s recommendations and is committed to continue our response work with provincial health system partners and First Nations communities in ensuring a response to the overdose crisis that meets the needs of First Nations. This includes our ongoing partnership work with the Ministry of Mental Health and Addictions towards developing an immediate response that includes crucial investment and improvements in mental health and addictions services as well as the development of a provincial mental health and addictions strategy.

FNHA is also committed to working with the Ministry of Mental Health and Addictions specifically towards addressing the second Priority Action listed under Recommendation 1 in the review:

    By September 2019, the Ministry of Health and the Ministry of Mental Health and Addictions in collaboration with First Nations Health Authority will develop and or revise provincial regulations for public and private addiction treatment facilities and services to set standards for provision of evidence-based treatment and require that these programs be systematically evaluated and monitored to ensure compliance.

Currently, there are no provincial regulated standards for addiction treatment. Fulfilling this action will contribute to greater accountability in delivering quality, evidence-based treatment services by ensuring care standards are in place that meet the needs of First Nations people and all residents of BC.
FNHA is undertaking a variety of activities in response to this Priority Action:

- Work to address this Priority Action will continue to build upon collaboration between FNHA and the Ministry of Mental Health and Addictions. A Ministry of Mental Health and Addictions - FNHA Letter of Understanding was signed in 2017 as an articulation of the way FNHA and the Ministry intend to work together to achieve our mutual objective of improving the mental health and wellness of the First Nations population in BC. The Ministry of Mental Health and Addictions also signed a Declaration of Commitment to Cultural Safety and Humility in April, 2018 reflecting the high priority placed on cultural safety and humility as essential dimensions of quality and safety in the design and delivery of programs and services.
- FNHA is partnering with the Ministry of Mental Health and Addictions and Ministry of Health to address the issue of developing and revising provincial regulations for addiction treatment facilities and supportive recover house facilities through participation on a joint working group. The working group will meet on a monthly basis to monitor the implementation of the Death Review Panel recommendations and to identify any issues that require escalation.
- FNHA funds several substance use programs that are administered and implemented by First Nations communities including the National Native Alcohol and Drug Abuse Program (NNADAP) in British Columbia inherited from Health Canada in 2013. This program provides a range of community-based prevention and treatment services and supports integrated with a network of addiction treatment centres which provide culturally relevant in-patient, outpatient and day or evening programs for alcohol, solvents and other drug addictions. A provincial review of NNADAP was completed in 2016 identifying several areas and actions towards program transformation and standardization of services and work has begun to transform this service. FNHA will bring shared learnings from these reviews to inform our collaborative work with the Ministry of Mental Health and Addictions on the review and development of provincial regulations.
- In an effort to ensure standards of care at FNHA funded treatment centres, all FNHA in-patient centres are accredited by Council of Accreditation, Accreditation Canada or Canadian Accreditation Council.

FNHA recognizes substance use treatment programs and services that meet the needs of First Nations people as one part of a culturally safe, comprehensive, and coordinated continuum of mental health and wellness approaches. This includes the need for follow-up and aftercare to ensure that those transitioning out of treatment have the supports they need.

I would like to thank the British Columbia Coroners Service and the panel members for their work on the report and recommendations, and for the opportunity to respond.

Sincerely,

Dr. Shannon McDonald
Deputy Chief Medical Officer
First Nations Health Authority

cc: Joe Gallagher, CEO, First Nations Health Authority
    Michael Egilson, Chair, Death Review Panel