



Registered Nurses' Association of Ontario
L'Association des infirmières et infirmiers
autorisés de l'Ontario

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Sent by email: Sophie.Kiwala@ontario.ca; rosa.gutierrez@ontario.ca

September 12, 2017

RE: RNAO request to be appointed to consultation group on Fetal Alcohol Spectrum Disorder (FASD) initiatives

Dear Sophie,

The Registered Nurses' Association of Ontario (RNAO) would like to thank you for taking the time to meet with us on July 19, 2017. After advocating to the province of Ontario for many years to address Fetal Alcohol Spectrum Disorder (FASD) in an evidence-informed manner,¹ RNAO was heartened to learn that more details about the FASD initiative will be released in September 2017. Meanwhile, we would like to strongly reiterate that **RNAO would be a tremendous asset as a member of the proposed consultation group to provide advice and feedback to inform implementation planning and prioritization of FASD initiatives** as announced in the 2017 provincial budget.² Our members have FASD experience that is lived as family caregivers, as well as professionals in clinical care across all health sectors including public health, school health, education/professional development, and public policy.

Informed by evidence and the expertise of our members RNAO would like to highlight the following key points to strengthen Ontario's approach to FASD:

- Keep making progress on upstream public policy interventions that impact health equity such as Ontario's Poverty Reduction Strategy³ and Ontario's Commitment to Reconciliation with Indigenous Peoples.^{4 5}
- Instead of steadily increasing the availability of alcohol and normalizing its use,⁶ RNAO⁷ and other health organizations⁸ continue to urge the government of Ontario to use public health evidence to inform a comprehensive provincial alcohol strategy to reduce alcohol use.
- In the context of upcoming legalization of recreational cannabis and the ongoing opioid crisis, implement a consistent public health approach to all drugs, including alcohol and tobacco, with strong regulatory frameworks and enforcement.
- Public awareness and education initiatives must be evidence-based, person-and family-centred using trauma-informed principles and utilize multi-level models of prevention such as those of the Canadian Fetal Alcohol Spectrum Disorder Research Network (Can FASD).⁹ Improve uptake of Canada's Low-Risk Alcohol Drinking Guidelines¹⁰ and

Canada's Lower-Risk Cannabis Use Guidelines¹¹ which respectively recommend against alcohol use or cannabis use if pregnant or planning to be pregnant.

- Increase access to early diagnosis, intervention, and support through universal screening to determine substance use, and provide brief interventions with the possibility of more comprehensive assessment as required.^{12 13 14}
- There is a critical need to increase capacity for early diagnosis, intervention, and support across primary care supported by regional neurodevelopmental diagnostic clinics that will provide interdisciplinary expertise on neurodevelopmental disorders including autism spectrum disorder, FASD, and acquired brain injury.
- In addition to interventions and support related to health care, seamless services to individuals with FASD and their families must cross the lifespan from childhood into adulthood, including consistent educational opportunities, respite care, extracurricular activities, housing, job training, and social inclusion.
- Increasing the presence of registered nurses with an expertise in mental health and public health^{15 16} within schools will support students, families, and educators with identification and support for neurodevelopmental issues.
- Given the Canadian data that youths with FASD are 19 times more likely to be incarcerated than youths without FASD in a given year,¹⁷ staff working within corrections, including nurses, need appropriate professional education on FASD. Broader systemic changes that need to be implemented to improve the lives of people with FASD include diversion away from the criminal justice system,¹⁸ implementation of Howard Sapers' recommendations on segregation,¹⁹ and transfer of responsibility for health and health services within correctional services from the Ministry of Community Safety and Correctional Services to the Ministry of Health and Long-Term Care.²⁰

Thank you once again, Sophie, for meeting with us and for considering these key points. RNAO will continue to advocate on this critical issue that is so important to our members as health providers, public health experts, healthy public policy advocates, neighbours, and loved ones of people with FASD.

We look forward to RNAO being appointed to the consultation group on FASD initiatives, as well as to meeting with you again in the near future.

Warm regards,



Doris Grinspun, RN, MSN, PhD, LLD(hon), O.ONT
Chief Executive Officer, RNAO

Cc. Hon. Michael Coteau, Minister of Children and Youth Services

¹ Registered Nurses' Association of Ontario (2017). RNAO letter to Sophia Kiwala. Toronto: Author, June 26, 2017.

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- ² Sousa, C. (2017). *2017 Ontario Budget: A Stronger, Healthier Ontario*. Toronto: Queen's Printer for Ontario, 117. <http://www.fin.gov.on.ca/en/budget/ontariobudgets/2017/budget2017.pdf>
- ³ Poverty Reduction in Ontario (2017). <https://www.ontario.ca/page/realizing-our-potential-ontarios-poverty-reduction-strategy-2014-2019>
- ⁴ Ministry of Indigenous Relations and Reconciliation (2016). *The Journey Together: Ontario's Commitment to Reconciliation with Indigenous Peoples*. Toronto: Author. https://files.ontario.ca/trc_report_web_mar17_en_1.pdf
- ⁵ Canadian Fetal Alcohol Spectrum Disorder Research Network (Can FASD), Centre of Excellence for Women's Health, and the Thunderbird Partnership Foundation (2017). Consensus Statement: Eight Tenets for Enacting the Truth and Reconciliation Commission's Call to Action #33. <https://canfasd.ca/wp-content/uploads/sites/35/2017/06/Consensus-Statement-Eight-Tenets-June-1.pdf>
- ⁶ Registered Nurses' Association of Ontario (2011). Letter to Attorney General on changes to the Liquor License Act. Toronto: Author. http://rnao.ca/sites/rnao-ca/files/7413_RNAO_letter_to_Minister_Bentley_re-liquor_licence.pdf
- ⁷ Registered Nurses' Association of Ontario (2016). Letter to Premier Wynne. Toronto: Author, March 3, 2016. http://rnao.ca/sites/rnao-ca/files/RNAO_to_Premier_alcohol_policy_march_3_2016_final.pdf
- ⁸ Centre for Addiction and Mental Health, Canadian Centre on Substance Abuse, Canadian Mental Health Association, MADD, Ontario Public Health Association, and the Registered Nurses' Association of Ontario (2015). Why Ontario needs a provincial alcohol policy. Toronto: Authors, September 21, 2015. https://www.camh.ca/en/hospital/about_camh/influencing_public_policy/Documents/Why_Ontario_needs_an_alcohol_strategy.pdf
- ⁹ Canadian Fetal Alcohol Spectrum Disorder Research Network (Can FASD) (2013). *Prevention of Fetal Alcohol Spectrum Disorder (FASD): A multi-level model*. https://canfasd.ca/wp-content/uploads/sites/35/2017/02/FASD-prevention-issue-paper_linksupdated2017.pdf
- ¹⁰ Canadian Centre on Substance Use and Addiction (2017). *Canada's Low-Risk Alcohol Drinking Guidelines*. Ottawa: Author. <http://www.ccsa.ca/Resource%20Library/2012-Canada-Low-Risk-Alcohol-Drinking-Guidelines-Brochure-en.pdf>
- ¹¹ Centre for Mental Health and Addiction (2017). *Canada's Lower-Risk Cannabis Use Guidelines*. Toronto: Author. http://www.camh.ca/en/research/news_and_publications/reports_and_books/Documents/LRCUG.KT.PublicBrochure.15June2017.pdf
- ¹² Registered Nurses' Association of Ontario (2015). *Engaging Clients Who Use Substances*. Toronto: Author. http://rnao.ca/sites/rnao-ca/files/Engaging_Clients_Who_Use_Substances_13_WEB.pdf
- ¹³ Public Health Ontario (2017). *Evidence Brief: Alcohol screening, brief interventions and referral (SBIR) services in health settings*. Toronto: Author. https://www.publichealthontario.ca/en/eRepository/Evidence_Brief_SBIR.pdf
- ¹⁴ College of Family Physicians of Canada (2012). *Alcohol Screening, Brief Intervention & Referral: A Clinical Guide*. Mississauga: Author. <https://www.sbir-diba.ca/docs/default-document-library/2012-screening-brief-intervention-and-referral-clinical-guide-enB0E406423349865474B15064.pdf?sfvrsn=4>
- ¹⁵ Community Health Nurses' Initiatives Group School Health Committee (2015). *Healthy Schools, Healthy Children: Maximizing the Contribution of Public Health Nursing*. Toronto: Author. <http://www.chnig.org/wp-content/uploads/2016/02/School-Nursing-Paper-2.pdf>
- ¹⁶ Registered Nurses' Association of Ontario (2016). RAO Letter to Minister Hoskins: Call for Increased Public Health Nurses in Schools. Toronto: Author. http://rnao.ca/sites/rnao-ca/files/RNAO_Letter_to_Minister_Hoskins_-_re_public_health_nurses_in_schools_and_nurses_in_CCACs_0.pdf
- ¹⁷ Popova, S., Lange, S., Bekmuradov, D., Mihic, A., & Rehm, J. (2011). Fetal alcohol spectrum disorder prevalence estimates in correctional systems: A systematic literature review. *Canadian Journal of Public Health*. 102 (5): 336-340.
- ¹⁸ John Howard Society of Ontario (2010). *Fact Sheet: Fetal Alcohol Spectrum Disorder and the Criminal Justice System: A Poor Fit*. Toronto: Author. <http://www.johnhoward.on.ca/wp-content/uploads/2014/09/facts-26-fasd-and-the-criminal-justice-system-december-2010.pdf>
- ¹⁹ Sapers, H. (2017). Segregation in Ontario: Independent Review of Ontario Corrections. Toronto: Ministry of Community Safety and Correctional Services. http://www.mcscs.jus.gov.on.ca/sites/default/files/content/mcscs/docs/IROC%20Segregation%20Report%20ENGLISH%20FINAL_0.pdf

²⁰ Registered Nurses' Association of Ontario (2017). *RNAO's feedback on strengthening legislation to enable correctional reform. Submission to the Ministry of Community Safety and Correctional Services, July 28, 2017.* Toronto: Author.