

August 30, 2019

Jennifer Fuchinsky
Fatality Inquiry Coordinator
Justice and Solicitor General
9th fl Peace Hills Trust Tower
10011 - 109 Street
Edmonton, AB T5J 3S8

Dear Ms. Fuchinsky,

SUBJECT: Nevaeh Michaud - Public Fatality Inquiry
Response to Recommendations

Thank you for your letter dated August 14, 2019 requesting a response to Honourable Judge Elizabeth A. Johnson's report to the Minister of Justice and Solicitor General regarding the inquiry into the death of Nevaeh Michaud.

We note the following recommendations made by her Honour:

1. Chloral hydrate can be used as a short-term measure to assist with sleep in children transitioning to different care situations. The usual dose is in the range of 50 mg/kg to a maximum dose of 1000 mg. Given that tolerance to the hypnotic effect of chloral hydrate is known to develop within 10 to 14 days this should be factored into the treatment plan and consideration should be made to wean or stop chloral hydrate shortly after the transition is accomplished. Chloral hydrate is not an appropriate drug for long [term] use to assist in sleeping in children.
2. Chloral hydrate should be prescribed with this in mind and should be prescribed for a defined period of time. It would be prudent not to have an automatic refill order for chloral hydrate but rather to thoughtfully assess the need and safety of prescribing before re-filling a prescription for chloral hydrate.
3. Chloral hydrate therapy should be monitored on a regular basis to evaluate dose, efficacy and safety. The therapeutic plan for chloral hydrate should include considerations as to when therapy should be weaned/stopped.

The College of Physicians and Surgeons of Alberta accepts the recommendations in principle. As the provincial regulator for the practice of medicine we are not experts in clinical medicine, nor is it our role to develop clinical practice recommendations. We rely on those with expertise such as clinical experts and organized medicine such as academic institutions and clinical medical societies to develop clinical recommendations.

Given the rapid evolution of medical research and knowledge, physicians rely on best practice recommendations to ensure that they provide the best care to patients based on the best and most up to date evidence. As a result, the methodology to develop clinical best practice recommendations is rigorous and based on a number of principles such as:

- Consensus from a group of experts
- A rigorous review of the literature
- Weighting of the evidence
- Practical considerations such as practice context, patient-related factors, societal expectations, etc.
- Careful mitigation of conflict of interest

We note that the clinical recommendations her Honour made were based on the testimony of a single expert. While we have no concerns with the credibility of the expert, and we agree that the recommendations reflect the advice we can see in some current peer-reviewed literature, we also note recent references that suggest chloral hydrate should not be used to treat insomnia in children because of significant side effects. We are concerned that the process used to reach these recommendations did not follow the principles and steps to develop best practice recommendations and not all the available evidence was considered prior to issuing them. Therefore, we are accepting the recommendations in principle vs. accepting them as is.

We understand that the fatality inquiry process is intended to prevent similar deaths and we agree that there is significant educational value in making physicians in Alberta who treat children aware of the case of Nevaeh Michaud and the risks associated with using chloral hydrate to treat insomnia in children. We will inform all our members about this case and encourage them to consult the peer-reviewed literature to ensure that they are prescribing for pediatric insomnia in accordance with the most recent evidence.

Sincerely yours,

Original Signed

Scott A. McLeod, MD, CCFP, FCFP
Registrar

Cc: Lorna Rosen, Deputy Minister of Health

KAM/gcj