

**A Review of Bill 283,
Advancing Oversight and Planning in Ontario's Health System Act,
2021**

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Background:

On April 27, 2021 Ontario introduced Bill 283, *Advancing Oversight and Planning in Ontario's Health System Act, 2021*.

Bill 283 puts in motion the designation of personal support workers (PSWs) as regulated health professionals and the establishment of a new corporation called the 'Health and Supportive Care Providers Oversight Authority'. The Authority will provide for consistency in PSW education, training and standards of practice.

Bayshore is one of Ontario's largest home care providers, delivering nursing, therapy and personal support services, as well as infusion pharmacy services that help Ontarians to remain safely at home. Bayshore's, government funded personal support staff provide approximately 6,000,000 hours of care annually. PSWs are at the heart of the home care system and we consider them the eyes and ears for our patients, ensuring patients' care needs are being met, hearing and understanding their concerns, and escalating when they realize patients may need more care.

We applaud this government's recognition of the important role of the PSW in delivery of home health care. We agree that the role of PSW needs to be elevated. In principle, we believe that designating PSWs as regulated health professionals is a positive step towards consistency in training and education, improvement in standards, accountability, and transparency with the public.

Staff providing personal support services may actually be foreign trained nurses, foreign trained physicians, paramedics, Developmental Service Workers (DSWs), Home Support Workers (HSWs), or Supportive Care Workers (SCWs). These staff are currently designated as Unregulated Care Providers (UCPs). We recommend caution when implementing any legislation that may destabilize the already fragile work force within the home health care sector which then would destabilize care delivery to patients and families.

Bayshore is supportive of a standardized and modernized education curriculum for PSWs, however, we do not believe that with the current curriculum and training time that they would have the knowledge, skills and competencies to be a self-regulated profession. PSWs will continue to need 'Transfer of Authority' or delegations from a regulated health professional, usually a nurse, in order to deliver safe clinical care. Current delegation regulations under the College of Nurses of Ontario (CNO) prohibits delegating certain controlled acts. This Transfer of Authority onto a PSW scope of practice would need further research and review to ensure safe practice.

Current curriculums focus mainly on long-term care facility-based care and skills that are no longer utilized within the home care sector, such as how to make a bed. Care is becoming increasingly more complex, and future curriculum must focus on gaps in critical skills and knowledge such as palliative care, managing challenging behaviours, dementia care and enhanced supports to clinical care.

Bill 283 Concerns:

1. Risk to Home Health Care Capacity

With the establishment of a regulatory body and registry, we risk over-bureaucratizing the oversight of PSWs which could reduce capacity within the home care sector, a sector whose resources are already

stretched thin. There are several Unregulated Care Providers (UCPs) providing care in Ontario that have not completed a PSW course, and costs associated with retraining and registration could perhaps deter them from the profession. There should be no cost to the PSW nor to the employer to support registration.

2. Limited Impact due to Voluntary Registration

We are concerned with the voluntary nature of this proposed registry. Regulation is meant to protect the public, but voluntary membership with no provision to protect the titles of those who are registered will not protect the public. If the registry were to be voluntary, PSW title protection must be provided for in legislation. If a regulatory body were to be established, we believe it should be a mandatory registration, similar that of nurses and physiotherapists in Ontario. If not all PSWs are registered, then it defeats the purpose of establishing a regulatory body. If the registry is voluntary, then it should not be shared publicly.

Recommendations:

1. Bill 283 must recognize the different skills and qualifications which are currently allowed within LHIN home care agreements for the delivery of personal support services and respect the staff already delivering care.
2. Bill 283 should provide a bridging program, approximately 5 years, to support current UCPs providing personal support to be retrained into a PSW certificate, and fund training time and training costs for career progression.
3. If a Registry is to be established, it should be mandatory for PSWs to register and legislation must offer title protection. If the Registry is voluntary, then it should not be shared publicly. Registration must be at no cost to PSW nor to employer.
4. The Authority must recognize the need for modernized curriculum for PSWs to meet the complex needs of Ontarians in the home care sector.

Thank you for the opportunity to present today on such an important issue; that is, keeping Ontarians safely at home, avoiding unnecessary hospitalization or placement into LTC.

About Bayshore HealthCare

Bayshore HealthCare is one of the country's leading providers of home and community health care services and is a Canadian-owned company. Bayshore has been a recipient of Canada's Best Managed Companies award since 2006.

With over 100 locations across the country, including home care offices, pharmacies and infusion clinics, Bayshore has more than 14,500 staff members and provides care to over 350,000 patients. We are dedicated to enhancing the quality of life, dignity and independence of all Canadians by providing customized care plans and solutions that allow patients to remain in the comfort of their own home.

In 2020 alone, Bayshore has provided nearly 6 million hours of personal support and 2.1 million hours of nursing care.

Mission: We are passionate and caring about everything we do. About our time with patients, how we treat one another and the quality of our work.

Vision: We imagine being the difference. Each and everyone one of us has the ability to create special moments, both big and small. We constantly look for ways to make things better and “be the different” in the lives of those we care for, work with and in our communities.

Values: We value compassion and reliability; team work and diversity; innovation, leadership and growth.