

May 14, 2021

Ms. Tanzima Khan
Clerk, Standing Committee on Social Policy
Room 1405, Whitney Block
99 Wellesley Street West
Toronto, ON, M7A 1A1
comm-socialpolicy@ola.org

Dear Ms. Khan,

On behalf of Home Care Ontario, the voice of home care in Ontario, I am pleased to provide the following submission and recommendations regarding Bill 283, *Advancing Oversight and Planning in Ontario's Health System Act, 2021* and specifically Schedule 2, which will enable the creation of the Health and Supportive Care Providers Oversight Authority (the Authority).

Ontario's Personal Support Workers (PSWs) have been true health care heroes throughout the COVID-19 pandemic, working tirelessly on the frontlines in home care and across our health care system to help keep our seniors, most vulnerable, and communities safe.

We owe them a huge debt of gratitude and while we support the government's goal of elevating the profession through the creation a consistent level of education, training, and standards of practice regardless of work setting or employment type, we must also recognize the ongoing and severe PSW staff shortages that currently exist in home care and have been exacerbated over the past year. It is through this lens that we provide our feedback, as well as specific recommendations for consideration by the Standing Committee on Social Policy and the Ministry of Health.

We also wish to stress at this juncture the importance of the subsequent regulations regarding this new Authority being developed through robust and meaningful consultation with the home care sector and other sectors that employ this important workforce, to ensure the regulations do not further undermine PSW recruitment and retention efforts.

Summary of Recommendations:

Recommendation #1: Government fund the start-up and ongoing operations of the Authority, and that registration is free for all PSWs to remove potential financial barriers, and ensure the new Authority does not exacerbate the current PSW staffing crisis facing home care.

Recommendation #2: The Authority follow the protocols of other regulatory bodies by requiring searches by an individual's name or registration number, rather than an open database, to ensure a PSW's personal information and privacy is protected.

Recommendation #3: Government provide a clear outline of the consultation process to develop the regulations regarding the new Authority, that Bill 283 not come into force until the regulations have been finalized, and that a transition period be clearly communicated to all affected parties to ensure the stability of Ontario's home care system.

Costs Must Be Borne by Government; Not the PSW nor the Employer

It is anticipated that as a brand-new entity, the Authority will have significant start-up and operating costs which will likely extend for several years until it reaches capacity. While the Legislation states that the new Authority would be self-funded, as the source of funding is not clear, it is a top concern for both PSWs and home care providers across the province.

While being a PSW is widely recognized as one of the most demanding and impactful jobs in our health care system, it is also one of the lowest paid. Recent moves by the government to extend the pandemic wage enhancement have been most welcome, given their modest salaries, however, we cannot place the additional financial burden of supporting this new Authority onto PSWs. Making this Authority self-funding will only serve as a barrier to the ongoing recruitment and retention efforts of both the government and sector alike.

In addition, Ontario's home care system has been chronically underfunded over the past decade, including no new investments in the recent provincial budget despite record levels of health care spending. Home care providers have continued to invest in staff recruitment and retention, training, technology and platform upgrades, and virtual care offerings to provide high quality care to their patients. The sector is in need of an immediate investment of approximately \$650 million to stop the exodus of home care staff to other care and employment settings, and does not have the resources to bear any additional costs of funding the memberships of the PSWs they employ.

Recommendation: *Government fund the start-up and ongoing operations of the Authority, and that registration is free for all PSWs to ensure the new Authority does not exacerbate the current PSW staff crisis facing home care.*

Protecting Personal Information and Privacy Must Be a Key Priority for the Authority

Ontario's home care providers take extensive steps to ensure the personal privacy of the home care staff they employ. It is critically important, therefore, that the new Authority put equally robust measures in place in order to maintain the confidentiality of personal information stored in its database. This is especially important in light of the serious breaches of personal information that occurred in past Ministry of Health PSW Registry initiatives and is something that must be fully addressed prior to the introduction of the Authority.

Home Care Ontario strongly recommends that the Authority follow the protocols of other regulatory bodies and require that a search is made by entering the name or registration number into the database to view results, rather than having an open system of all names. Doing so will ensure that the new Authority strikes the right balance between transparency and protecting the privacy of individuals.

Finally, we would recommend that as Ontario continues to move forward with micro-credentialling to help create additional workforce capacity, such as HSWs, the Authority also add them to the database at a later date.

Recommendation: *The Authority follow the protocols of other regulatory bodies by requiring searches by an individual's name or registration number, rather than an open database, to ensure a PSW's personal information and privacy is protected.*

Clear Transition Timelines Must Be Developed in Partnership with the Sector

Given the important role that the regulations under Bill 283 will play in creating a new oversight Authority that meets the needs of both the public and the profession, it is critical that clear timelines in terms of the consultation around their development be provided to Health Associations. Doing so would both allow for adequate feedback from service providers, individual PSWs and others impacted by this legislation, as well as help the sector prepare for its implementation. In addition, as government regularly does with other bills that will impact a sector to a similar magnitude as Bill 283, we respectfully urge government to not proclaim nor bring the bill into force until the regulations have been finalized.

We would also urge the government to stipulate clear timelines around the transition period before any changes occur to ensure the stability of staffing in the current environment. We would recommend that this include clear communication and outreach with sectors as well as service providers to help ensure that Ontario's PSW workforce is prepared for this change.

Recommendation: *Government provide a clear outline of the consultation process to develop the regulations regarding the new Authority, that Bill 283 not come into force until the regulations have been finalized and that a transition period be clearly communicated to all affected parties to ensure the stability of Ontario's home care system.*

Thank you for the opportunity to put forward this submission and look forward to further consultations regarding this important piece of legislation to our workforce.

Sincerely,



Sue VanderBent, CEO

cc Hon. Christine Elliott, Deputy Premier and Minister of Health
 Laurel Brazill, Director of Stakeholder Relations, Office of the Minister of Health
 Andrew Vittas, Senior Policy Advisor, Office of the Minister of Health
 Rana Shamoon, Director, Health Policy, Office of the Premier

About Home Care Ontario

Home Care Ontario, *the voice of home care in Ontario™*, is a member-based organization with a mandate to promote growth and development of the home care sector through advocacy, knowledge transfer, and member service. For over thirty years Home Care Ontario has promoted the growth and development of home care as a key pillar of Ontario's health care system through advocacy, knowledge transfer, thought leadership, and member service.

In Ontario, service provider organizations are responsible for providing nursing care, home support services, personal care, physiotherapy, occupational therapy, respiratory therapy, infusion pharmacy, social work, dietetics, speech language therapy and medical equipment and supplies in the home to individuals of all ages. An estimated 50 million hours of publicly and family-funded home care service is provided annually across the province.