



November 11, 2023

Hon. Sylvia Jones
Minister of Health

ATTN: Home and Community Care Branch,
Strategic Partnerships Division,
9th Floor, 56 Wellesley St W,
Toronto, ON. M5S2S3

via e-mail: HCCB.Modernization@ontario.ca

Dear Minister Jones,

Re: Analysis of Regulatory Impact of Convenient Care at Home Act, 2023

I am Erin Ariss, President of the Ontario Nurses' Association (ONA). ONA is the union representing 68,000 registered nurses (RNs) and health-care professionals, and more than 18,000 nursing student affiliates who provide care in hospitals, long-term care facilities, public health units, community, industry, and clinics. Our membership includes thousands of care coordinators and direct care staff working within Home and Community Care Support Services in almost every region. Our ONA members are proud care coordinators, nurse practitioners, clinical care specialists, receptionists, mental health and addictions nurses, palliative nurses, and so much more. We thank the Ministry of Health for an opportunity to provide our feedback on the proposed changes under the Convenient Care at Home Act, 2023.

Every Ontarian deserves the right to timely and appropriate care coordination when discharged from an acute care setting. Home and Community Care Support Services utilizes highly skilled Care Coordinators to assess the unique needs of individual clients and their families to ensure that the best possible allocation of available services is resourced and aligned to ensure supports are in place when needed. It is essential that interference with the relationship between care coordinators and Ontarians is minimized to ensure that no one is disadvantaged or risks the loss of required services while restructuring unfolds in the province.

ONA believes that the planned changes will trigger a province-wide vote under PSLRTA followed by negotiations to initiate the standardization of collective agreements. Home and Community Care assessment could become more standardized, but simultaneously, that could result in fewer safeguards related to providing appropriate levels and continuity of care to diverse populations across different regions of the province.

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Operationally, there will be fewer administrative costs for employers and the union in the administration and application of up to two Collective Agreements as opposed to the twenty that exist today.

However, ONA has significant concerns regarding the continuity of care as these changes get operationalized. Eventually, after the amalgamation into Ontario Health at Home, a further transition to the Ontario Health Teams (OHTs) is planned. This will be another transition that will impact the continuity of care. The OHTs are not fully functional, and only a few existing OHTs include primary care. It is unclear how and if care coordination will be embedded into Family Health Teams and Community Health Centres or other models of primary care or other health providers. Will this transition also trigger further PSLRTA votes? For ONA members, these proposed changes could significantly impact retention in the sector and their ability to have a continued strong voice for better care within communities. ONA recommends that changes of such magnitude be made through a legislative framework with greater certainty for the professionals doing care coordination and assessments instead of through regulations without legislative review.

We agree that improvements must be made to deliver consistent quality and accessible home care for Ontarians. However, high turnover and vacancy rates among workers is an issue that needs to be addressed, especially with all the uncertainty in this sector. This starts with making substantial investments in policies such as competitive compensation for nurses and health-care professionals across all sectors, including home care, and ensuring working conditions free of violence and threats to address retention and recruitment issues in the sector.

ONA would be open to discussing this in detail should the Ministry require further expertise and feedback. Thank you.

Sincerely,



Erin Ariss, RN
President, Ontario Nurses' Association

C: Andrea Kay, CEO, Ontario Nurses' Association