

February 15, 2023

Ministry of Long Term Care  
via online submission

Dear Sir or Madam:

**RE: Amending Ontario Regulation 246/22 under the Fixing Long-Term Care Act, 2021**

Concerned Friends is pleased to provide the Ministry of Long-Term Care with feedback on its latest proposed amendments.

As an organization that advocates for quality safe experiences for long term care residents, we strongly oppose the use of non-regulated personal support workers (PSWs) to administer medications to residents in long-term care (LTC) settings. Medication administration is not simply the visible task of handing a pill to a person. Significant knowledge is required to safely administer medications along with related knowledge to critically think and make judgements required in the appropriate administration of medications. Regulation of professional groups is required for public safety. The education required to administer medications safely cannot simply be provided to PSWs without also providing related knowledge, which in essence is the curriculum of a nursing program.

We are hopeful that the national standards for LTC will be formally adopted and enforced by the Ontario government. All Ontario LTC homes should be funded to fully meet these standards. If Ontario's standards were sufficient, would we have seen the deaths in these settings during COVID? In fact, the use of a high percentage of non-regulated employees in long term care was a contributing factor to outbreaks of COVID among residents and staff resulting in insufficient staffing and ultimately in residents dying alone from COVID or dehydration.

Similarly, the safe handling and preparation of food for a large group requires the knowledge in existing programs to work in this field. On a daily basis, Long-term care residents' safety and health are dependent on nutritious menus and safely prepared food. This depends on fully trained and certified staff.

There is an acute shortage of Registered Nurses (RNs) and Licensed Practical Nurses (LPNs) across Canada, and we agree that innovative and flexible staffing solutions are required. However, the proposal confuses innovative and flexible staffing solutions with hiring unregulated employees and providing training that will not be at the standard of programs with accredited or standardized curricula. Innovative and flexible staffing means considering options such as 4- or 6-hour shifts instead of 12- hour shifts for employees who would otherwise not work. It means improving workplace environments so that persons with the right credentials choose to work rather than take sick leave or change their type of employment. It means resourcing home care to help older adults remain in their home with the appropriate supports. It does not mean lowering pre-requisite training and educational criteria.

It is alarming that work that requires significant training is being recommended to be done by persons who may be given training but will not be graduates of the appropriate programs. From the perspective of LTC residents, if there is insufficient, appropriate staffing available for LTC settings, a safer solution is to provide adequate resources to support persons in their community.

We agree that air conditioning is a basic requirement particularly for older adults who are less able to regulate their body temperature. Furthermore, air conditioning must be available in all residents' rooms and not just in "cooling" areas where they can be "herded" on a hot day. Allowing LTC settings to operate without air conditioning is unacceptable.

We assume the fall prevention programs and skin and wound care programs will be implemented by clinical nurse specialists or NPs; all LTC settings need nurse consultants with expertise in these areas.

Overall, we applaud the government for revisiting its legislation as evidence of its commitment to continuous improvement. We urge the Ministry to develop and enforce higher, not lower, standards that become a model for our country and provide the best possible experiences for residents. Beyond regulations, this means: a) fully funding LTCHs to meet standards and b) addressing changes to the workplace to attract and retain qualified trained staff teams.

Sincerely yours,

*Kristle Calisto-Tavares*

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President, Concerned Friends Board of Directors