



Ontario Association of Councils on Aging (OACA)

**Submission on Bill 135
(Convenient Care at Home Act)**

November 15, 2023

Lilian Wells

President, OACA

l.wells.oaca@rogers.com

The Ontario Association of Councils on Aging (OACA)

The Ontario Association of Councils on Aging (OACA) Board of Directors requests consideration of the recommendations contained herein relating to the optimal delivery of home and community services and placement services across the multiple and diverse regions of Ontario.

The OACA reflects the perspective of thousands of older adults across the province whose lived experience provides valuable insights into issues affecting older adults and others typically receiving such services, as caregivers to those receiving such services, and/or as professionals who fulfill or have fulfilled various capacities in health care or related fields.

Summary of the Position of the OACA Board of Directors on Bill 135

The proposed legislation appears to identify an alternative governance, operations, and service delivery structure (i.e., the dissolution of what remains of the former Local Health Integration Networks, LHINs), while not identifying anticipated improvements in either quality or quantity of care and service.

Consistent with the position the OACA has taken in other advocacy efforts, the Board of Directors would propose that Bill 135 needs to satisfactorily include provision for:

1. **Quality of service**, as defined by national/provincial standards with corresponding outcome metrics, supported by commensurate public funding.
2. **Governance and operational structures** that are adequately funded and staffed and that support the identified standards, optimize effective delivery of services, and provide quality care and service that is responsive to local needs and is person-centred.
3. **Public accountability** of the governance, operations, public funding, and delivery of services, with opportunities for input/feedback from service recipients, caregivers, and others with a direct or indirect interest in these types of care and services.

The proposed legislation appears to be relatively high level and therefore lacks many details that will likely be addressed in regulations and in implementation. Accordingly, the Board's position is high level and intended to provide a framework for the preparation of regulations and for implementation. The subsequent section will amplify the Board's position on each of the above three priorities and include specific recommendations.

Recommendations from the OACA on Bill 135

1. Quality of Care and Service

The focus of the proposed legislation is entirely on changing the existing organizational structure and related elements, with little or no mention of the ultimate purpose for the structure as identified in the title – Care at Home. Although the proposed Service Organization is intended to provide home and community services (i.e., home care) and placement services (i.e., long-term care homes and related services), there is no emphasis on standards of practice, quality of care and service, improved access, metrics to ensure objectives are met, corresponding adequacy of staffing and provincial funding and accountability to people served, caregivers and to the public. In addition, there is no mention of a person-centred approach which respects the person's expressed needs, values, preferences, the continuity of their care and the support of caregivers.

Recommendations:

- 1.1** The Bill must at least express the aspirational goal of supporting people to live at home and/or to seek placement close to home and family/support network if required.
- 1.2** The Bill (or the accompanying regulations and implementation plan) must include adherence to national/provincial standards of best practice that will address the quality of care and service delivery and the corresponding metrics to ensure objectives are met.
- 1.3** The Bill (or the accompanying regulations and implementation plan) must address the provision of adequate staffing and provincial funding to support the successful implementation of the care and services identified in the Bill.
- 1.4** The Bill (or the accompanying regulations and implementation plan) must address the need to improve levels of person-centred care and services, people's access to care and services including help with system navigation, and measures for quality improvement that include input and feedback from people receiving the care and services, their caregivers, and others with an interest in such care and services.

2. Effective Governance and Responsiveness

The focus of the Bill appears to be on centralizing the governance and administration of the delivery of care and services, with little or no mention of the need to be responsive to the regional variances across the province (i.e., rural, urban, population density, cultural diversity, availability of care and services locally etc.).

In addition, one Board of Directors with 9 members appointed by the Minister overseeing a complex province-wide system with one CEO does not evoke confidence that the delivery of services will be nuanced and responsive to local community and individual needs. Furthermore, the lack of provision for advocates to serve on the Board on behalf of system users and caregivers generates further doubt about the potential for a responsive delivery system for care and services.

Recommendations:

- 2.1 The Bill (or the accompanying regulations and implementation plan) must include a structure that enables local decision making on the delivery of care and services.
- 2.2 The Board of Directors members must include advocates for persons receiving the care and services and for caregivers and others working to support the recipients and caregivers.

3. Public Accountability

Health care and services that are publicly funded must have corresponding adequate public accountability of the governance, operations, and delivery of services, with opportunities for input/feedback from service recipients, caregivers, and others with a direct or indirect interest in these types of care and services. Such measures may include public meetings, public advisory committees at the provincial and local levels, “value for money” audits that ensure public funds are optimally spent for public benefit, and other similar measures.

Recommendations:

- 3.1 The Bill (or the accompanying regulations and implementation plan) must include various identified measures that enable the public to contribute to the accountability of the Service Organization and related entities for the optimal provision of publicly funded quality care and services across the province and in local areas.

Closing Statement: The OACA Board of Directors has deep regard for the significance of home care, placement, and related services in the spectrum of health care services in this province and their impact on the quality of life of so many Ontarians. The Board urges the government to carefully consider the points made and the recommendations provided in this submission.

