



Ontario Society of Senior Citizens Organizations
La Société des Organisations des Citoyens Aînés de l'Ontario

June 19, 2020

Natalia Kusendova, MPP
Chair, Standing Committee on Social Policy
99 Wellesley Street West
Room 1405, Whitney Block
Queen's Park, Toronto, ON M7A 1A2

Attention: Tonia Grannum comm-socialpolicy@ola.org

Re: Submission to the Standing Committee on Bill 175 -*Connecting People to Home and Community Care Act*

Dear Ms. Kusendova:

Ontario Society of Senior Citizens Organizations (OSSCO) is a charity, led by senior citizens. We focus on improving the quality of life of ageing Ontarians, keeping seniors informed and engaged through education and information which is relevant to them. We have no political affiliation. We receive no ongoing government funding. OSSCO works with all levels of government as well as decision makers and influencers to educate them on establishing and maintaining equitable systems that support safe and dignified ageing.

OSSCO is very supportive of government's goal to modernize home and community care. A strong home and community care system can help keep seniors out of hospital emergency rooms and long-term care homes. However, COVID-19 has highlighted serious, and dangerous systemic gaps in how seniors receive care both in institutional accommodation and in home care. Bill 175 in its current state adds additional pressures onto both of these systems.

Bill 175 rescinds the Local Health Systems Integration Act, 2006, removing the goal of "...enduring commitment to the principles of public administration, comprehensiveness, universality, portability, accessibility and accountability as provided in the Canada Health Act" and commitment to "...equity and respect for diversity in communities ..."

If Bill 175 is passed, systems planning will go to Ontario Health and regional planning to the Ontario Health Teams, with Local Health Integration Networks (LHINS) becoming Home Care and Community Support Services, and, eventually disappearing. This raises concerns about potential fragmentation and inconsistency of services and programs



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across Ontario. It puts additional challenges onto families when older Ontarians move between the different regions and access to services and programs which the senior may receive in 1 region, and for which there may be no comparable service in the other region.

Instead of a province wide-vision in home care and community service delivery, each Ontario Health Team will choose the services it provides - either directly or by contracting with other providers, or by funding clients/families for self-directed care. This can lead to inequitable services across the province, with no region having an identical basket of “goods” and services that all Ontarians can expect to receive.

There are also no consistent provincial or minimum qualifications for approved provider. Once Ontario Health and Ontario Health Teams make a decision on service levels, the Minister of Health can no longer approve, disapprove, or remove providers - even when there is risk to the system, such as was recently demonstrated in the Long Term Care system. When one organization assigns, manages, and delivers care, and also controls resources, it can also set its own limits and unilaterally provide services on grounds other than client need - a form of rationing. This removes standardization, efficiencies and accountability to the public and the Minister of Health in our Provincially funded health care system.

With the current Bill 175, there is an increased risk that the home care and community services “system” becomes a fragmented, patchwork regional system in the delivery of prescribed services. Services will no longer be uniform. It is not unrealistic that a senior who lives in 1 region may not have access to needed home care and community services while, if they lived in a different region, they would have had access to those services.

As well, the legislation does not clearly define or describe what are the “prescribed services” that must be offered to all Ontarians. This must be amended or else it will fall to regulation and policy for correction in order to ensure that Ontarians can access those prescribed services.

With individual providers using their own auditors, data could be inconsistent, making it difficult to hold the “system” accountable or for the Minister of Health to respond quickly and appropriately without consistent, standardized format for data collection and reporting.

Public governance and accountability must continue to be strengthened or else the transference of key functions to private (sometimes for-profit) entities who are not accountable to the public will continue. We would not like to see the Minister of Health



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face similar challenges as the Minister of Long-Term Care recently did with the COVID-19 outbreaks in long term care homes.

Home care and community services are predominantly used by older Ontarians, people with complex health care issues or persons with disabilities. In addition to introducing some new concerns, Bill 175 doesn't address the issues that already exist in the system such as access to services for all Ontarians, consistent assessments amongst the LHIN's, the role of private companies in the Ontario health care system as well as common standards and quality for service delivery to all Ontarians.

The issue of staffing shortages or people working with multiple service providers is also not addressed. This is of particular concern to our members with the potential increase of community spread of infections such as COVID-19. There is also no statement of purpose or objects that reflect public interest or the principles of the *Canada Health Act*.

OSSCO believes that it is important that users of the Home Care and Community services, especially aging Ontario are protected. It is unclear that when the current Bill of Rights is repealed, what its replacement will look like. Nor do we know how it will be enforced. We need to ensure that the complaints processes continue to be fair and consistent across the province, including guarding privacy and maintaining quality.

Bill 175 has left OSSCO with more questions and less clarity of what are the prescribed services, how consistency in service delivery, accountability and a minimum level of services will be for all Ontarians, regardless of age. We look forward to continuing to work with the government in the finalization of Bill 175 and issues that affect ageing Ontarians.

Yours truly,

Elizabeth Nykorowysch Macnab



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