

June 19, 2020

Richard Steele
Deputy Minister
Ministry of Long-Term Care
6th Floor, 400 University Avenue
Toronto, ON
M5G 1S5

Re: Immediate Actions to Prevent Further COVID-19 Outbreaks in Long-Term Care Homes

Dear Deputy Steele,

I want to begin by thanking you and your staff for your tireless efforts to support long-term care (LTC) homes over the last few months. You have been incredibly receptive and responsive to our many suggestions and recommendations to protect the residents and staff who are living and working in Ontario's LTC homes.

As you are aware, LTC has been the hardest hit sector of the COVID-19 pandemic in Ontario, Canada and around the world. System-level issues that existed long before the pandemic have contributed to the devastating impacts of COVID-19 on LTC homes across the province.

We recognize that the government will soon launch an independent commission into Ontario's LTC system, and we look forward to informing and participating in that process. However, while the commission undertakes its work, the LTC sector must continue to be supported to prevent further COVID-19 outbreaks in homes. These supports must be based on person-centred and emotional-based models of care and it will be important for the Ministry to support initiatives to provide this type of care.

As such, in this letter, we are putting forward two sets of recommendations as follows:

1. Existing Measures that Must Remain in Place During the Pandemic

Recommendations regarding existing pandemic-related protocols, practices, and policies currently in place that we believe must be kept in effect to help keep residents safe.

2. Additional Measures Required to Prevent Further COVID-19 Outbreaks

Recommendations on long-standing issues where we believe action is critical to prevent a second wave of outbreaks, because our residents, their families, and our staff deserve nothing less.

Please find these recommendations outlined in detail below.

1. Existing Measures that Must Remain in Place During the Pandemic

A. HHR Supports

i) Continue to Allow Redeployment and Flexibility in Staffing

In mid-April, the provincial government issued an Emergency Order allowing for the redeployment of staff from other health care settings to LTC homes to provide personal support services, homemaking and/or other professional services. The Ministry also implemented regulation changes that allowed homes to use certain staff such as PSW assistants and RAI coordinators to perform other duties as needed. Both strategies were critical to support homes in addressing short term human resource issues. We recommend that the province continue to allow redeployment of staff into the LTC sector as needed. The province should also continue to allow flexibility regarding who provides care in the LTC sector until the staffing issues are adequately addressed.

ii) Maintain the Emergency Order Restricting Workers to a Single Site

In April, the government issued an Emergency Order restricting LTC staff from working in more than one LTC home, retirement home, or health care setting. In order to continue to protect residents and staff during the pandemic, which is expected to last months or even years, this order must continue to be upheld.

Given our experience and learnings in the first few months of this pandemic, we further recommend that the Ministry extend this to restrict healthcare workers from working in any other workplaces.

These measures will greatly reduce the possibility of infection spread from other health care or workplace locations into LTC homes, which is critical to helping keep residents safe and should apply regardless of any collective agreements in place.

B. Other

i) Continue Prevention and Containment Funding and Extend Pandemic Pay

Since the onset of the pandemic, homes have needed financial support to prevent and contain the COVID-19 outbreak. It is imperative that the additional funding the province has provided must continue to allow homes to receive reimbursement for essential costs that keep residents safe, such as:

- > Personal protective equipment (PPE)
- > Increased cleaning regimes
- > Increased staff to support enhanced cleaning activities
- > Increased staff to screen visitors

In the short-term the Ministry must continue to provide containment funding and should consider rolling this into the base funding for LTC homes. In the long-term, the

Ministry must commit to growing this funding to meet actual costs that we know exceed the current amount homes have received.

In addition, the Ministry should continue to fund the pandemic pay increase that is currently in place and should also consider making this pay available to managers, particularly those working on the front lines of care. This pay has been critical to supporting retention in the short term and will continue to assist with this issue in the longer term as well.

ii) Maintain Restrictions on Visiting as Per New Policy

We recognize the critical role family caregivers play in the physical health and emotional well-being of LTC residents. The Ministry should consider options that keep residents safe while keeping them connected with families. For example, rather than prescribe one outdoor visit for 30 minutes per week, the Ministry could consider alternatives such as virtual, window or unlimited outdoor visits and provide the funding needed to support the alternatives. Homes should have flexibility in determining frequency based on their available resources.

It will be important, however, that the Ministry continue to follow the best medical advice to maintain visitation practices, such as limits on non-essential visitors, to ensure the safety and health of residents. In addition, it is critical that LTC homes have the needed resources to implement physical distancing during these visits including staffing and PPE in order to continue to safely support family visits in a way that protects residents and staff.

iii) Ensure Collaborative Testing and Surveillance Strategy

A comprehensive surveillance strategy for LTC homes that includes testing must be in place to support detection and a timely response to COVID-19. Initial reports suggest that inadequate access to swabs as well as delayed and/or inaccurate test results contributed to challenges in containing COVID-19 in some homes. With the expansion of testing in homes, outbreaks seemed to be smaller in scale.

Considerations must be made for the frequency of testing as well as the type of testing undertaken. Feedback from staff suggests that the current tests are too invasive and having to perform these tests twice a month will be difficult for many and may cause some staff to leave the LTC sector.

The Ministry should:

- > Continue to require consistent testing of staff and residents at regular intervals.
- > Identify and implement options to support alternative testing methods that are less invasive.
- > Work with public health to ensure all homes have access to the swabs they need. This will support enhanced detection and will allow homes to quickly identify unknown cases or homes in outbreak.
- > Ensure results are returned to the LTC home in a timely manner.
- > Collaborate with public health to ensure that there are adequate resources in place to support contact tracing in a coordinated manner.

- > Provide funding to each home to support surveillance testing. Public health should be required to work with homes where needed.

iv) Ensure Sufficient PPE Supply Levels

Early in the pandemic, we sent out a survey to members regarding PPE and at that time, nearly half of the respondents indicated that they were understocked in terms of their PPE supply. Following that, many of our members continuously expressed concerns about PPE shortages, even while some were in outbreak, which was a contributing factor to the early spread of COVID-19 in the LTC sector.

While the PPE supply situation has somewhat improved, the prices for supplies have gone up considerably and some items remain hard to source. As a result, it is critical that government continue to assist LTC homes with procurement and reimbursement for PPE supplies, as forcing homes to again use their regular supply chains will result in undersupplied homes, making them vulnerable to outbreak and putting their residents and staff at risk. The province must ensure that immediate needs for PPE are met across the LTC sector to protect residents and staff from the potential of a second wave of COVID-19.

2. Additional Measures Required to Prevent Further COVID-19 Outbreaks

In addition to the recommendations highlighted above focused on stopping the spread of COVID-19, we also believe it is critical to address the long-standing issues that contributed to the spread in the first place. While we recognize that it is the role of the commission to make recommendations in many of these areas, we firmly believe that some immediate actions must be taken in order to prevent a second wave of outbreaks in the sector.

A. HHR Supports

i) Increase Funding for Health Human Resources

The Ministry is in the process of developing a report from its LTC staffing study and we urge that the recommendations from our 2020 pre-budget submission be reflected in that report in addition to the following additional suggestions.

In order to stabilize LTC as hospital staff return to work, the Ministry should provide increased funding to allow homes to recruit additional staff. Specifically, the Ministry should increase funding to support a minimum provincial average of four hours of care per resident per day to meet increased acuity as a start. The Ministry should commit to grow this number to meet the current and future needs in LTC homes. The Ministry should also identify funding needed for homes to have more full-time staff. Additionally, to prepare for a potential second wave, each home would need resources to retain infection prevention and control (IPAC) nurses. Having access to this expertise will allow homes to increase IPAC measures, which will support outbreak management and containment.

ii) Address the Unique Challenges of Northern and Rural Communities

The critical shortage of appropriately trained staff is challenging in urban areas and desperate in rural and remote Ontario, which undermines the quality of care residents

deserve. We urge the Ministry to work with our Association and Ontario Health to proactively prepare emergency human resource plans for these areas. Otherwise, a potential second wave could have a devastating effect on LTC in these communities.

B. OTHER

i) Reverse Cuts to Pharmacy Funding

Beginning at the end of 2019, significant changes to pharmacy funding were implemented and the plan is to phase in further funding reductions over the next four years. Despite concerns from the long-term care sector, the Ministry of Health has moved forward with these changes. The pandemic has highlighted the impact that under-funding in long term care sector has had on resident and staff health and safety. We strongly urge the province to immediately reverse the funding reductions, and at the minimum do not undertake further cuts in 2021.

ii) Include LTC Homes in the Governance Structure of Every Ontario Health Team

LTC homes are an integral part of the continuum of care and must be a key part of every Ontario Health Team (OHT), where their expertise and knowledge of this sector can be leveraged. The Ministry should ensure that LTC homes are integrated into all OHT's as mandatory partners, both in their development and in their governance model.

iii) Addressing Insurance Limitations

The COVID-19 pandemic has meant that LTC homes can only renew existing insurance policies, but they are not able to increase or enhance their liability coverage. Moreover, many insurance providers are now putting exclusionary clauses into renewal contracts omitting liability during pandemics. Without insurance for claims during pandemics, governance structures (voluntary board members), owners, directors, officers and possibly even foundations are put at risk of personal liability. We recommend that the province provide a solution for the sector, such as indemnifying homes ahead of a potential second wave of outbreaks.

iv) Develop Strategy for New Development/Redevelopment that Considers IPAC

The redevelopment of 15,000 beds and building of 15,000 new beds by 2025 in the LTC sector is well underway. Assuming that the government does not want to continue to have older beds in older facilities operational for longer than needed, the financial subsidy available to homes under the current capital development program needs to increase in order to expedite the process as well as secure funding for the remaining 15,000 beds that need to redevelop by 2025 (30,000 existing beds in total). This is especially important given that the IPAC assessments demonstrated that 3-4 bed ward rooms did not work to contain the spread of COVID-19. Moreover, we suggest that the province allocate additional and specific funding for interior design and furnishings to improve IPAC within the current designs

We will be providing additional recommendations related to areas such as health human resources and LTC home infrastructure modernization over the course of the summer.

We urge the Ministry to keep the existing practices and protocols that we have identified in place during the pandemic as well as adopt the additional recommendations that we have suggested. These will be critical to preventing the devastating impact that a second wave of outbreaks could bring to the vulnerable residents living in Ontario's LTC homes. We would welcome the opportunity to meet with you to discuss our recommendations in detail and we look forward to continuing to work together.

Sincerely,

A handwritten signature in black ink, appearing to read 'Lisa Levin', with a stylized flourish at the end.

Lisa Levin
CEO

Cc: Hon. Merrilee Fullerton, Minister of Long-Term Care