



PSNO Oral Submission to the Standing Committee on Social Policy: Bill 21, *Retirement Homes Act, 2010*

Thank you to the Standing Committee for the opportunity to present today. My name is Sarah Blakely and I am here representing the Personal Support Network of Ontario (PSNO). Our organization is the voice of Personal Support Professionals in Ontario. We strive to help personal support professionals carry out their work more effectively by offering access to information, resources and tools as well as providing opportunities to connect with a network of professionals in the field. PSNO's vision is to build a strong, cooperative personal support service sector where providers, managers, trainers and employees are equal contributors to strengthening the profession. Every member involved in PSNO is an equal contributor to strengthening the profession.

We applaud the government for taking the steps to ensure we have appropriate measures in place to protect seniors who choose to live in retirement homes. However, we wish to bring to the committee's attention a number of concerns from a personal support perspective with regards to the legislation.

We have three key recommendations for consideration:

- Recommendation #1: A clearly defined scope of practice for Personal Support Workers in Retirement Homes, establish Care Standards and required supervision for Personal Support Workers Recommendation**
- #2: Establishment of standardized education and training for PSWs Recommendation**
- #3: Resident Safety through PSW Self-Regulation**



Background

There is currently no universally accepted definition or protection for the title Personal Support Worker (PSW). The title encompasses jobs previously known as health care aide, personal attendant, home support workers, etc.ⁱ In fact, Health Canada does not recognize PSW as its own occupation, including it in the broader category of “Visiting Homemaker” as identified in the National Occupational Classification.ⁱⁱ

Generally speaking, PSWs are front line workers who provide a variety of personal care, homemaking and support services to individuals in retirement homes, long-term care facilities, private homes, community home care, supportive housing and hospitals.ⁱⁱⁱ There are approximately 90,000 PSW-like workers in Ontario, 60% of whom work in facilities (e.g. long-term care and retirement homes) and 40% in the community. PSWs also provide 67% of the volume of home care services in Ontario.^{iv}

As an unregulated health care worker, PSWs are not “certified” by a regulating body.^v A PSW training certificate is issued by the training institution, if the worker has taken a formal training programme. Formal PSW training is based on a curriculum developed by the Government of Ontario and the Ontario Community Support Association, and includes a minimum of 600 hours of training over 14 modules (theory, evaluation and practicum).**Error! Bookmark not defined.** However, not all PSWs obtain formal training, resulting in wide variance from one “PSW’s” skill set to another, and making it difficult for an employer to determine the abilities a particular employee may possess.

PSWs provide a range of services specifically tailored to their clients, including: home management (e.g., shopping, meal preparation); personal care (e.g., personal hygiene, mobility); family responsibilities (e.g., care giving to children); and social and recreational activities.ⁱⁱⁱ While PSWs do not offer formal treatment for specific ailments, their support can impact significantly on their clients’ health status and overall wellness. Within their scope of practice, PSWs often administer



oral or topical medications or eye drops. These tasks are often a part of the PSW's job in a retirement home. While these acts may be done safely, we call the committee's attention to a necessary distinction between a permissible act and an unsafe context in which the act is expected to be performed. For example, without care standards, a PSW may continue to be asked to administer medications in an unsafe context (e.g. to many residents in an extremely short period of time.)

In some cases, PSWs can perform controlled acts under specific circumstances as set out in the Regulated Health Professions Act, or as delegated to them under the supervision of a regulated health professional such as a Registered Nurse (RN) or Registered Practical Nurse (RPN). Controlled acts are procedures whose risk to public safety has caused them to be restricted to members of a regulated health Providers Act (RHPA). However, PSWs often perform controlled acts such as, administering suppositories, enemas or tube feedings. We are concerned that PSWs will be asked to perform these acts outside of the permissible settings, or without the legislated support.

With an aging population experiencing chronic disease and complex conditions, and the desire of the public to age comfortably in their chosen environment, the role and profile of PSWs will continue to increase. In order to utilize this worker to their full potential in retirement homes, several key issues need to be addressed. These key issues are: 1) resident safety through self-regulation; 2) defined education and training standards for PSWs; 3) and scope of practice and supervision.

Each of these recommendations will support the improvement of the quality of care provided by PSWs and increase the public confidence in the care they will receive in retirement homes. The accountability of training programs, the quality outcomes for personal support and safety measure to protect the public should be overseen by those who know most about what the workers do – Personal Support Workers and their employers. With these measures in place, the province will be



further ahead in reducing health care costs by ensuring the right care, is providing in the right place, by the right care provider.

Resident Safety through Self-Regulation

In 2005, the Minister of Health and Long-Term Care asked the Health Professions Regulatory Advisory Council (HPRAC) to make a recommendation regarding the regulation of PSWs under the RHPA.ⁱ HPRAC's final response in 2006 recommended that PSWs should not be regulated as a profession under RHPA. In the absence of regulation, PSNO recommends that the Standing Committee consider a registry and provincial certification for Personal Support Workers be adopted. These recommendations could be done at low cost but produce better care results and increase the safety and security of residents receiving care in Retirement Homes.

i). A Personal Support Occupation Registry - As a step to improving the public's perception and trust of PSWs and the care received in retirement homes, we propose a public registry of personal support occupations. Registration would require a clear result from routine vulnerable screening check, confirmation of Canadian citizenship or permanent residency status and a list of all employment in healthcare.

Information gathered should include basic **demographic data, date of certification and a work record of any successful terminations** (if any and for what cause). This information should be available to all prospective employers similar to a police check but be available only with consent and authorization of the PSW involved. There should be an independent body of some type, made up of peers and registered staff, who understand the work done by PSWs and are able to adjudicate the registry status of PSWs.

The registry would be overseen by Personal Support Workers, Employers, regulated professionals and other healthcare stakeholders, making this a truly collaborative approach.



Persons could be removed from the registry for a number of specified reasons, such as being convicted of a criminal offense, or if dismissed from work as a PSW due to incompetence or inappropriate conduct. In this way, a register would enable potential employers to identify individuals who are unsuitable for employment as PSWs.

Registries for various professions are not uncommon in Ontario. For example, a registry is maintained by Ontario's Financial Services Commissions relating to practitioners who provide services under the Statutory Accidents Benefit Schedule.

ii). **Certification of Personal Support Workers** - The Personal Support Network of Ontario suggests that a province-wide minimum standards and competencies for PSWs be established. PSWs would either have to meet these standards or demonstrate these standards prior to practicing, by holding a certificate from a recognized educational program, or by demonstrating adequate competency through documented experience.

PSWs should be required to complete a **standardized entry-to-practice examination** and a **practical skills evaluation** to gain certification. PSWs would also **sign off on a PSW code of conduct commitment**. This will ensure that all PSWs entering the healthcare system will be fully capable and competent to perform the duties usually ascribed to PSWs. Criteria to qualify for a registry could change as it evolves.

Eventually, members of the PSW registry could be the only individuals practicing in the healthcare system that would be permitted to use the title PSW or any variation thereof. Title protection would provide clarity for the public, employers and other healthcare professionals, but would require legislative authority.

Defined Education and Training Standards for PSWs



Stakeholders have become increasingly concerned over the lack of accountability and quality issues in the training of personal support workers. Without clear accountabilities, proper oversight and coordination of PSW training, it will be difficult for the Government to deliver on its mandate for quality health care and control of health care costs. Currently, not all PSW training organizations are equal in their commitment to prepare students as PSWs or follow the established training standards. We feel strongly that an accreditation process for PSW training programs based on the MOHLTC PSW Program Standard would address these issues and improve the overall quality of graduates. Training standards for all training organizations should be enforced by an independent 3rd party.

Scope of Practice and Supervision

The scope of practice and supervision of PSWs is a policy issue that is increasing in importance due to the rising number of complex care and chronic disease cases PSWs manage and the rising health human resource challenges. Currently in retirement homes, responsibilities that were traditionally the domain of RNs and RPNs are now being shifted to PSWs. While PSWs perform a wide range of skills, it is not within their scope of practice to make independent decisions about a client's care plan. They follow a defined care plan and are limited to assisting with activities that an individual would be able to perform on his/her own if they were able to. In order to support PSWs in managing complex cases, proper supervision is required and essential. This includes appropriate ratios of supervisors to PSWs and clear processes for assigning and monitoring the PSW's work.

PSWs are an important human resource across our health system. Among health care providers we see a lack of clarity regarding the role of PSWs; there is no consistent understanding of what a PSW can and can't do in the various health sectors where they play a key role.

A defined scope of practice for personal support workers would clarify what PSWs can and cannot do in a retirement home environment. Practice standards would support a clear, shared concept of



the scope of role for personal support workers, clients, educators, employers and the general public. For other health professions, practice standards are the essential authoritative basis of practice for each health professional. Virtually all health care professionals have well-defined and well-known standards or scope of practice statements: PSWs need this as well. In addition, clarity and increased confidence would also result from the establishment of uniform minimum entry-to-practice standards for PSWs.

With nearly 100,000 PSW-like workers in the province of Ontario, personal support is one of the largest components of the province's health care work force. Retirement homes, like other sectors, rely heavily upon Personal Support Workers to meet their minimum care requirements, often leaving workers in this work environment overloaded and stretched beyond their professional capacity. If the goal of the new retirement homes act is to define and enforce better safety mechanisms to protect the residents of those homes, these key recommendations must to be incorporated into the act.

Recommendation #1: A clearly define scope of practice in Retirement Homes, Care Standards and required supervision for Personal Support Workers

As the complexity and acuity of client cases increase in all health care sectors as well as retirement homes, it will be important to clearly define the PSW's scope of practice and the processes for supporting it. The main outcomes for this policy action are to define the scope of practice of PSWs in retirement homes, define the process for controlled acts, defined guidelines for the supervision of PSWs, defined care standards and staff to resident ratios and creating escalation processes for requests that are out of a PSW's scope of practice.

Recommendation #2: Establishment of standardized education and training for PSWs

Standardizing the curriculum and educational outcomes of PSW training programs would ensure consistency in PSW qualifications and skills; increasing employer and resident confidence. It will also be important to define expectation for ongoing professional development of PSWs in maintaining their core competences.

Recommendation #3: Resident Safety through Self-Regulation

The introduction of a Certification or licensing for PSWs which will define minimum standards and competencies for PSWs and the establishment of a provincial registry for personal support occupations will offer retirement homes and their residents' additional peace of mind and reduce their risks when utilizing PSWs as the main delivery agents of care.

Again, on behalf of all Personal Support Workers in the province, I wish to thank you for the opportunity to present today.

ⁱ Health Professions Regulatory Advisory Council. (2006, September). *The Regulation of Personal Support Workers*. <http://www.hprac.org/en/reports/resources/PSW-FinalReportSept27-06.pdf>

ⁱⁱ Human Resources and Skills Development Canada. *National Occupational Classification*. <http://www5.hrsdc.gc.ca/NOC/English/NOC/2006/Welcome.aspx>

ⁱⁱⁱ PSNO. *The Role of Personal Support Workers Fact Sheet* <http://www.psno.ca/factsheets>

^{iv} Caplan, Elinor. (2005). *Realizing The Potential Of Home Care - Competing for Excellence by Rewarding Results*. Toronto: CCAC Procurement Review. Retrieved on February 27, 2009 from <http://www.ocsa.on.ca/PDF/CaplanReportMay30,05.pdf>

^v Personal Support Network of Ontario Web site. <http://www.personalsupportontario.ca/>