PSNO Submission for the
CONSULTATIONS ON EDUCATIONAL STANDARDS
FOR PERSONAL SUPPORT WORKERS
May 22, 2012

I. BACKGROUND / CONTEXT

In May 2011, the government committed to the establishment of a Personal Support Worker (PSW) Registry in Ontario. The Ministry is currently consulting with key stakeholders on the establishment of educational standards for PSWs for the purpose of inclusion on the Registry.

The regulation under the Long-Term Care Homes Act, 2007 requires that, as of July 1, 2011, PSWs employed in long-term care homes, with limited exceptions, have completed a program that meets one of the three-educational standards noted below.

- Ministry of Training, Colleges and Universities’ PSW vocational standard (provided by Colleges of Applied Arts and Technology*)

  *Note: This Ministry standard only applies to vocational PSW programs provided by Ontario Colleges of Applied Arts and Technology (CAATs) and does not apply to vocational PSW programs provided by Ontario’s private career colleges (PCCs). PCC PSW programs must adhere to one of the two standards below or provide a disclaimer, informing students that they will not be eligible for employment in long-term care.

- National Association of Career Colleges’ standards

- Ontario Community Support Association’s (OCSA) standards

II. CONSULTATION QUESTIONS

1. Are there any reasons why these three standards should not be adopted as currently written or with some modification as the core eligibility requirements for Ontario’s PSW Registry?

It is the position of the Personal Support Network of Ontario (PSNO) that one, consistent training standard should be applied as soon as possible for reliable, consistent outcomes in PSW training. We would recommend that all training sectors and PSW stakeholders
be brought together to collaborate on this work. We would like to see a clear mandate for the work, guiding principles that recognize and value the contribution of all in the process and shared accountability for the end result. It would also be important that the work going forward ensures that the role of personal support workers is anchored in the holistic approach to caring for clients, supporting their needs, their circle of care and respect for the psycho-social philosophy that distinguishes the PSW role from any other.

If it is not possible to begin work on a new standard in the immediate future, in the short term to reduce confusion, the existing standards should be recognized across all sectors. The standards are not incongruent; it is the application of standards that lacks consistency.

To ensure consistency of the training and until the province has one, consistent standard, we recommend a mandatory accountability mechanism be adopted. We feel PSW stakeholders are ready to come together to define the minimum, common outcomes for a competent graduate and quickly enforce training sectors to meet these expectations. Much of this work has already been done by the Personal Support Worker Education Program Accreditation (PEPA) at OCSA. We endorse this accreditation model and support it as the solution to improving consistency and quality in PSW training.

PSWs are also interested in seeing a provincial wide certification exam implemented as soon as possible. PSNO has been involved in creating a credential for formally trained PSWs and will launch a provincial credential \textit{PSW(p) Professional} in 2012. Our credential is attained by the completion of a short and long answer exam and a practical skills evaluation. The examination process measures proficiency and the ability to use applied knowledge, critical thinking skills and work within the ethical code designed by personal support workers.

We feel this program if adopted as the gold standard of measuring competency would be a positive contribution to measuring what a competent workforce looks like.

2. What are the key challenges or opportunities in implementing these educational standards as a requirement for PSWs?

There are a number of challenges we wish to raise.

\textbf{Barriers to Employment}

Under the \textit{Long Term Care Homes Act, 2010}, a person may work as a PSW in an Ontario Long Term Care (LTC) Home only if s/he is a graduate of a PSW program that is at least
600 hours in length and meets one of three educational standards (OCSA, NACC or MTCU).

A person without the training described above may still qualify for employment as a PSW in a LTC Home if s/he

- Was working or employed as a PSW at an Ontario LTC home at any time in the 12-month period preceding July 1st, 2011; and

- Has at least three years of full-time experience, or the equivalent through part-time experience, as a PSW.

This exemption does not require that the experience must be in the home to which the applicant is applying. However, under the legislation, experience must be in a home licensed under Ontario’s Long Term Care Homes Act. This exemption does not include work done in LTC homes in other provinces, because the Act only covers homes in Ontario.

Currently students trained in Ontario under one of the three standards at a time when the provincial requirement was less than 600 hours, are facing barriers to employment in long term care. Many long term care homes are not accepting PSW who have been grandfathered under the new LTC legislation. This is creating barriers for worker mobility and the impact should be assessed before the government creates further educational requirements for entry to practice. We support a common educational standard that everyone should attain. However, we would like to see supports in place to enable anyone who wishes to proceed to meet the new standard. Our PSW workforce, especially in the community sector, is a scarce resource and any changes that could create barriers to employment need to be reviewed and mitigated.

**Equivalency Assessment**

We estimate there are about 1,000 PSW-like workers who require an equivalency assessment therefore, a mechanism is needed for workers trained outside of province. This requires recognition that a granting body has the authority to review and declare an out-of-province graduate as equivalent. One entity is required as the definitive source of opinion for out-of-province (Canada only) workers with representation from all three standard entities is seen as a favourable option.

**No Current Ability to Keep Content Current**

At this time, we have no mechanism to keep content current or to expose instructors or students to the latest emerging or best practices in personal support. Through our research, PSWs continue to raise concerns that are not adequately prepared to support clients with mental health issues and are concerned about the changing acuity of their
clients and residents, yet we have no consistent approach to improve curriculum as the expectations for the role changes.

There are a number of key opportunities we have identified if the province were to proceed with one common PSW training standard:

**Cultural Competencies**
There is a need for recognition of cultural competencies in the program and a need for innovation in program offerings (i.e. schools for new Canadians that serve diverse populations, taught in their mother tongue, etc).

**Mentoring**
We’ve seen great success in mentoring programs for new nursing graduates which has eased their transition into the workforce. The role of PSW is very demanding and a new graduate could benefit greatly from mentoring opportunities that would provide additional support and guidance through that first year of employment.

**Career Pathways**
With one consistent standard, and third party oversight that the standard is being achieved, we then create a scenario whereby we can better define career pathways for PSWs who wish to go on to specialty training. With each PSW being equally prepared for the role, this is easier to achieve in a consistent manner.

**Professionalism**
Personal Support Workers take great pride in their work. We also want them to be able to take great pride in their educational achievement. By having PSW training recognized appropriately and equally, we are providing PSWs with a great sense of professionalism that they deserve.

**Improve Interdisciplinary Care Teams**
With one consistent standard and third party oversight the standard is being achieved, PSWs will begin to find it easier to be integrated into interdisciplinary care teams. When we can say with certainty that PSW training is consistent and reliable, we can begin to build trust with other team members that PSWs can practice safely and competently.

**Define Scope/Understanding of the Role**
When we have one consistent training standard and third party oversight of training, work needs to be done to define the scope of personal support. This clarity will not only support the registry efforts to increase recognition of the role, but will also improve care, job satisfaction and provide something clear and easy to articulate to the public.
Articulate value in program content of IADL support
PSWs are experts in supportive care, but most training programs lack the ability to articulate for students the value support for Instrumental Activities of Daily Living (IADLs) play in contributing to the quality of life for the clients they serve. We would like the standards review to take the opportunity to refresh the content in PSW programs to include new information and research (i.e. A. Paul Williams of the University of Toronto’s work on the Balance of Care) on the significance of IADL support in the personal support worker function. If PSWs were exposed to new research on the value of IADL support, there would be a clearer understanding of the necessary supportive functions of the role, more acceptance of taking on those tasks.

3. Are there other issues we should consider when developing educational standards for PSWs?

Personal Support is a separate and distinct discipline
Educational standards are the educators’ knowledgeable and realistic response to the requirements of employers within the bounds of legislation. Educational providers need to focus on the need to know versus the nice to know. We have seen over the years a move to “medicalize” personal support work, which is concerning. The unique value proposition of PSW is the fact that PSWs are experts in supportive care: comfort measures, companionship, personal care, support to the family, etc. This needs to be celebrated and expanded.

Community Placements
Placement issues should be addressed in the review of the PSW training standard. We currently have training programs in operation that are not providing a community placement for PSW students, which is not meeting the requirements of the program, and not exposing students to career possibilities in the community sector. These students then leave the program ill prepared for the demands of working independently in a community or home setting, which leads to dissatisfaction and sometimes attrition. We therefore recommend the Ministry should swiftly move to reinforce requirements to include community placements in the PSW practicum experience.

Limits to the Amount of Content that is Available Online or Through Distance Education
PSWs are social learners and need to interact with content, instructor and peers for effective learning. There are some pieces of the program that could be taught through distance or online learning but it would be inappropriate to take the entire program and try to offer it this way. We would like to see defined limits on particular content which can be made available through this method.
Cause and Effect Analysis of Any Changes
The cost implications if a PSW certificate is mandatory needs to be considered and the impact on supply and demand reviewed. Many workers are casual and part-time and the financial resources and availability of PSW education can be quite limited.

We should move forward with formal PSW education as a requirement of employment until these key considerations are in place:
1. Accreditation is mandatory and all training sectors are meeting expectations on consistent learning outcomes,
2. We understand the breadth and scope of all personal support occupations and what it will take to support them (resources and otherwise) to meet the new standard,
3. One consistent standard has been created.

We thank you for the opportunity to share our thoughts on how to move forward with a common training standard for Personal Support Worker Training.

We would be happy to follow up should you have any further questions.

Sincerely,

Lori Holloway
Director, PSNO