

Home Care Ontario Submission:

## INCREASING EMPLOYER PARTICIPATION IN THE ONTARIO IMMIGRANT NOMINEE PROGRAM

To: The Ministry of Labour, Immigration, Training and Skills Development

Re: Consultation on Employer Requirements and Experience with the Ontario Immigrant Nominee Program

Tracking Number: 24-MLITSD003

### A. Employer Requirements:

What the government would like to know:

1. Do you think these requirements are too restrictive, not restrictive enough or do you agree with the requirements as they are currently written? Please be specific. Which requirement(s) do you feel are too restrictive, not restrictive enough or are currently reasonable?

#### **OUR ANSWER:**

***Home Care Ontario believes that the current stipulation that only permanent employment job offers qualify does not allow access to a number of critical roles in the home care sector. Increasing flexibility for home care Service Provider Organizations (SPO's) will be critical to ensuring they can respond as the Ontario government's announced Home Care Modernization plan unfolds over the coming years.***

***This will help to attract the necessary staff by having those roles recognized as eligible and not be restricted by the OINP program which may undermine patient care.***

***Home Care Ontario recommends, for example, that the program recognize identified home care workers in roles (specifically therapists) that are independent contractors.***

2. If you are a business owner, would these requirements discourage or prevent you from participating in the OINP? If so, which requirement(s) do you find prohibitive?

**OUR ANSWER:**

**Preparation of the information currently requested is too onerous for organizations whose internal resources are already stretched by the HHR shortages this program is intended to improve. Home Care Ontario recommends the removal of unnecessary/duplicate requirements that are already collected by other entities at the provincial and federal level, such as OH@home contracts, CRA, WSIB and HCCSS.**

What suggestions would you make to amend, remove, or add to these requirements to encourage participation in the OINP?

**OUR ANSWER:**

***The program should recognize identified workers in roles (specifically therapists) within Home Care organizations that are independent contractors.***

3. Are there alternative requirements that you would suggest which demonstrate an employer's ability provide stable employment for a newcomer?

**OUR ANSWER:**

***Home Care SPO's are legislatively defined and recognized organizations whose business operations have a record of government service contracts. As a result of being qualified SPOs for HCCSS, for example, our members meet a number of OINP criteria automatically (since SPO's would have already submitted annual financials, provided proof of accreditation, and listed longstanding historical contractual relationships). Home Care Ontario suggests that this verified information for SPO's be accessed where available to reduce the time and administrative burden faced by employers.***

## **B. Documentation**

What the government would like to know:

1. If you are a small business owner, would obtaining any of the currently requested documents be considered a burden or take an unreasonable amount of time to acquire? Which document(s) would be most burdensome?

**OUR ANSWER:**

***Preparing the financial documents is time consuming and the process could be improved. Home Care Ontario suggests that verified information for SPO's be accessed where available, such as with HCCSS and CRA, to avoid re-submission by employers. For example, Home Care SPO's have already undergone the HCCSS prequalification process and provided financials, proof of insurance etc. Home Care Ontario also sees no clear need for an organizational chart and suggests this requirement be removed. Some members have also expressed concern about the potential risk of confidential business information being released to applicants. Ensuring that the process does not, or will not, pose this risk would enhance trust and confidence in the program by employers.***

2. How could the current requirements be modified to reduce the amount of burden on businesses, while still ensuring the employer's business meets the requirements set out in Section A?

**OUR ANSWER:**

***Pursuant to the recommendation above, Home Care Ontario proposes establishing a list of recognized organizations, including Home Care SPO's, that could be referenced to avoid re-submission of information. If the process recognized individual sectors, like Home Care, in a more obvious way, program administrators could access Ontario Health's list of prequalified SPO's (our members) which would be easily accessible, available and current. This change would support streamlining the process on both sides.***

3. Are there alternative documents that you would suggest that demonstrate that an employer's business meets the requirements set out in Section A?

**OUR ANSWER:**

***Home Care Ontario believes that the required information exists for Home Care SPO's and could be accessed through existing governmental sources such as OH, HCCSS and CRA. Any employer time spent in the process related to proving an already acknowledged and existing staffing shortage is burdensome and should be eliminated.***

## **C. Other Considerations**

*What the government would like to know:*

1. Should the government investigate considerations for certain industries or jobs, based on the need for workers?

**OUR ANSWER:**

***Increasing flexibility for home care Service Provider Organizations (SPO's) will be critical to ensuring they can respond as the government Ontario government's announced Home Care Modernization plan (link here) unfolds over the coming years.***

***This will help attract the necessary staff by having those roles recognized as eligible and not be restricted by the OINP program which may undermine patient care.***

***Home Care Ontario recommends, for example that the program recognize identified home care workers in roles (specifically therapists) that are independent contractors. In addition, Allied Health Professional requirements that are already in place with Professional Regulatory Colleges should be integrated and streamlined. Health care workers need to optimize their full skills and scope of practice as quickly as possible including transitional periods in some roles. For example, foreign trained Physiotherapists may need to work as rehab assistants until professional College licensing is acquired. Employer organizations should be able to change the role(s) for these persons (such as from rehab assistant to physiotherapist) easily if the applicant is still meeting the requirements of the original agreement.***

2. What additional considerations or sectors do you think the government should investigate? Do not limit yourself to the examples above.

**OUR ANSWER:**

***Home Care is experiencing an overall staffing shortage. The research referenced in the cover letter to this submission demonstrates this fact. Home Care Ontario recommends that scoring and overall enhanced prioritization be given to all roles (clinical, managerial and administrative) in the home care sector. An industry/sector specific approach could enhance the programs' effectiveness and improve employer participation.***

## **D. Your Experiences**

*What the government would like to know:*

1. If you are an employer, nominee, or prospective nominee, or you have obtained permanent residency through the OINP, what challenges did you encounter while submitting your application and documentation?

**OUR ANSWER:**

***Home Care Ontario members have had trouble ensuring expectations were clear for both employers and prospective nominees. This would be improved though more accessible options including a 'live person' being available for answers and clarification. The existing online resources are not sufficient.***

2. If you chose not to proceed with an OINP application, why did you decide not to proceed? What requirements or other factors were prohibitive to your participation in the program?

**OUR ANSWER:**

***Home Care Ontario members have indicated that the most serious prohibitive issues relate to: a) the burdensome time currently required for program participation, b) the provision of sensitive financial information, and c) overly restrictive job models. Finally, it would be ideal if the program made it possible that once an applicant has resident status, they were committed to staying in the community (for a reasonable duration of time) to provide services for the sponsoring agency.***