



Tracking Number: 25-HLTC005
Ministry of Health
Comments Due: April 30, 2025

Subject: Reducing Barriers to Registration and Practise for Regulated Health Professionals Registered in other Jurisdictions

Home Care Ontario Response to the Proposed Regulations for Reducing Barriers to Practice and Enhancing Labour Mobility for Regulated Health Professionals Registered in other Jurisdictions

Introduction:

Home Care Ontario is pleased to provide input on the proposed Regulations for reducing barriers to practice and enhancing labour mobility for regulated health professionals registered in other jurisdictions. Home Care Ontario is a member-based organization representing the full spectrum of home care providers in the province. Members are united by a singular mission to provide outstanding nursing care, home support services, personal care, physiotherapy, occupational therapy, respiratory therapy, infusion pharmacy, social work, dietetics, speech language therapy and medical equipment and supplies.

Background:

Home Care Ontario is pleased to see these labour mobility enhancements being extended to the sector and expanded to now include additional regulated professionals. As workforce pressures change over time, these proposed Regulations will help to ensure that additional numbers of staff will be available from other jurisdictions. This will strengthen the current capacity and ability to recruit and retain health human resources (HHR). Providing health care at home is a safe, cost-effective, and efficient means of ensuring that Ontarians can age where they wish, while also alleviating pressure on other areas of the health system, such as hospitals and long-term care. Home Care Ontario acknowledges that the number of regulated health professionals that would fall under this Regulation is not yet fully known, however, any and all additional HHR capacity is required at this critical juncture. With the threat of tariffs impacting Ontario businesses outside the health care system, it would be advisable to create and maintain as many jobs in the Home Care sector as possible to limit negative financial impact for families.

The information provided concerning the proposed regulatory change(s) includes four identified theme areas (with related questions) that were posed with regard to the entirety of

the proposed changes. This document focuses on the specific elements most relevant to the Home Care sector and its ability to safely and effectively provide accountability and oversight during implementation.

Current Registration Processes:

MOH questions posed about current registration processes:

1. *What challenges currently exist with the registration process for health professionals regulated in another province or territory, and for U.S registered physicians and nurses?*

Association Response:

Removing existing practice setting restrictions through the proposed regulatory amendments will help to address one of the major regulatory Registry disparities that existed for Home Care providers relative to hospitals and Long-Term Care Homes. By including all care settings within the proposed Regulation, consistent standards of care will be ensured across the entire health care system and the Home Care sector will avoid further disadvantages in the labour market. Removing restrictions will encourage more professionals to enter the Home Care workforce as soon as they arrive in Ontario and will also more fairly structure the registration process with an Ontario health regulatory College. Some of our members already provide nursing and therapy services in border communities and currently face challenges in recruitment and retention. Cross-border sharing of resources has been problematic due to restrictions in licensing. The proposed changes should help to retain our skilled Home Care professionals in Ontario.

Patient Safety and Quality of Care:

MOH questions posed about Patient Safety and Quality of Care:

2. *What are the positive impacts to patient safety or the quality of care provided to patients in Ontario with each of the four proposals?*
3. *Are there any risks to patient safety or the quality of care with each of the four proposals? How could these risks be mitigated?*

Association Response:

Home Care service providers have the infrastructure, technology, knowledge and capabilities to provide the orientation, preceptorship and support required to prepare interjurisdictional practitioners for practice in Ontario. These supports can safely and reliably enable out-of-province professionals to practice for up to 6 months while completing the registration process and waiting for their application to be approved.

The capacity of the Home Care Sector has already been demonstrated through their:

- a) ability to successfully host preceptorship(s)
- b) long history of supporting recent graduates
- c) track record of integrating foreign-trained nurses within their care teams

Benefits and Risks:

MOH questions posed concerning Benefits and Risks:

- 4. *What are the benefits for patients and health professionals associated with each of the four proposals?*
- 5. *Are there any additional risks with these proposals that you would like to highlight?*

Association Response:

Home Care plays a critical role in the delivery of health care services to Ontarians in the comfort of their homes, promoting independence and reducing the strain on acute care and Long-Term Care Homes. By including the Home Care sector and additional regulated professionals within the proposed Regulation, the sector can ensure consistent standards of care across all health care settings and avoid placing Home Care service providers (employers) at a further disadvantage regarding the recruitment of talented staff.

The Home Care sector continues to require access to an increasingly large supply of skilled regulated professional personnel. Without adequate HHR supply, Home Care providers cannot meet the growing needs of clients to stay safely at home which can often result in premature placement into long-term care or inappropriate admission to acute care.

Many of our members provide care in rural and remote communities. With this Regulation, the sector could more easily recruit in 'harder to service' regions which brings economic wealth to that community, particularly in Northern Ontario. Considering the current government mandate to support jobs in the north, this Regulation would help to achieve this goal.

Implementation:

MOH questions posed about Implementation:

- 6. *What implementation considerations or supports should the ministry be aware of for each of the four proposals?*
- 7. *What supports would regulated health professionals from another province or territory or U.S registered physicians and nurses need to help with the transition to practising in Ontario?*

Association Response:

It is essential to recognize that Home Care is as safe as both acute care and long-term care settings when appropriate protocols and measures are put in place. In addition to their proven ability to successfully support recent graduates, host preceptorships and the ability to integrate foreign-trained nurses within their care teams, the Home Care sector features a number of key quality and safety initiatives that demonstrate the ability and readiness for implementation efforts associated with the proposed Regulations (see Appendix “A” for a list of select key quality and safety initiatives implemented by the sector). Home Care Ontario members are also capable of offering orientation for American nurses and therapists to the Ontario provincial regulatory bodies and best practice guidelines as support to practice in Ontario.

Home Care Ontario also raises the issue of immigration status/residency for consideration in conjunction with the proposed regulatory registration improvements. Our members are hopeful that this expedited route to initially practice in Ontario, (including by US trained nurses and doctors), will be further supported by the immigration/residency improvements needed. It would be beneficial to clarify whether these US trained professionals would either be given immigration status sooner (permanent residency) or be able to practice without this status as part of these proposed regulatory improvements.

It is also notable that the expanded list of regulated professions to be captured by the proposed Regulations does not include Social Work. The rationale for this, or sharing details of this professions’ planned inclusion, would be greatly appreciated.

Overall, the expansion of the Regulation(s) as proposed will facilitate the placement of more health professionals in the Home Care sector, thus allowing enhanced independence for clients in their homes and equitable access to care in local communities. Home Care Ontario would be pleased to meet to discuss this submission in further detail.

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Appendix “A”

Other key quality and safety initiatives implemented by the sector include:

- **Quality Control and Continuous Improvements Programs:** Organizations have developed Professional Practice and Quality Departments that include oversight of nursing teams, comprehensive orientation and training programs as well as education pathways to continue supporting both new hires and existing nurses through ongoing professional development.
- **Caregiver Education and Training:** Providers have emphasized the importance of providing comprehensive education and training for caregivers akin to the training provided to healthcare professionals in acute care settings. This ensures that staff, including nurses and support staff, possess the necessary knowledge and skills to provide safe and high-quality care while adhering to established protocols.
- **Technology Integration:** The past few years have highlighted how the use of virtual care solutions, remote monitoring technologies, and electronic health records can improve communication, coordination, and safety in HCC as they have in acute care settings.
- **Infection Prevention and Control (IPAC):** Policies and protocols emphasize the importance of hand hygiene, proper use of personal protective equipment (PPE), and stringent cleaning and disinfection procedures in line with acute care settings.
- **Screening and Assessment:** Practices adopted by providers underscore the significance of comprehensive screening and assessment processes in identifying potential risks and ensuring appropriate care planning. Regular health monitoring and access to necessary resources facilitate effective screening practices and ensure the safety of individuals receiving home and community care.