



October 28, 2025

Digital Health Standards Team Ontario Health DigitalHealthStandards@OntarioHealth.ca

Re: Provincial Health Services Directory FHIR iGuide

Dear Digital Health Standards Team:

Home Care Ontario and Ontario Community Support Association (the Associations) are pleased to formally respond to the "Open Review" on the Provincial Health Services Directory (PHSD).

The Provincial Health Services Directory is a critical component of the digital architecture in the province that facilitates access to an accurate and compressive directory of provider and service information. This key directory facilitates referral management, care management, discharge planning, and provider recredentialing. In the future state will also be accessible by patients and their families as they navigate their own health care needs.

For the purposes of this "Open Review," we have focused our comments on the "Business Context" of the technical specifications and will highlight the following:

- Data Source for Home Care and Community Support Services,
- Use Case expansion, and
- Onboarding

## **Data Source**

Home Care and Community Support Service Organizations and the services they provide to Ontarians is critical to both modernization and transformation. The proposed PHSD FHIR iGuide, proposes to use the Healthline database as the data source for Home Care and Community Support Services information. Currently, this information does not accurately reflect services available across the Home and Community Care sector.

The Associations request that the Healthline database be updated to reflect the comprehensive nature of Home Care and Community Support Service Organizations. As part of the update process consultation with the Home and Community Care Service Providers should occur to identify key information

categories that may be missing. This should be done as soon as possible. In addition, the process for submitting and updating data on an ongoing basis must be standardized and then communicated to all Home and Community Care Service Organizations.

## **Use Cases**

Any Home Care or Community Support Service Organization that employs regulated health professionals engage in an annual re-credentialing process. Currently, Use Case #1b, calls out hospital administrators as the consumers of PHSD for re-credentialing.

The Associations request that "Use Case #1b" be expanded to include any service provider that hires regulated health professionals.

## **Onboarding**

Historically, onboarding to the provincial digital assets has been challenging for some Home Care and Community Support Service Organizations, with some of the challenge being regional in nature. As highlighted in the "Business Context" of the specification, the broad benefit of the PHSD to referral management, care management, discharge planning, and provider credentialing processes is significant. The Associations are requesting that **all** Home Care and Community Support Service Organization be eligible to onboard to the PHSD regardless of their location or size.

These comments above have been added to the "Comments" spreadsheet and appended to this letter. Thank you for the opportunity to provide feedback on this important provincial directory. If further clarification is required, please reach out to Cheryl Reid-Haughian @cheryl.reidhaughianconsulting@gmail.com

Respectfully submitted,

Cameron MacKay

CEO, Home Care Ontario

Lori Holloway

CEO, Ontario Community Support Association