

Proposal number: 25-MLITSD019

Home Care Ontario Response to the proposed amendments to regulations under the Ontario Immigration Act, 2015 to redesign the Ontario Immigrant Nominee Program's (OINP) Streams

Introduction:

Home Care Ontario is pleased to provide input on the proposed amendments to regulations under the Ontario Immigration Act, 2015 to redesign the Ontario Immigrant Nominee Program's (OINP) Streams. Home Care Ontario is a member-based organization representing the full spectrum of home care providers in the province. Members share a 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.

Feedback:

Overall, we are pleased with the efforts and direction being taken with the program, however, there is an urgency to address the issues and barriers identified in this submission. Without action on these matters, we are at risk of losing valuable healthcare workers and, as a result, the ability to serve growing patient volumes and needs. Removing or lowering these obstacles will support staff retention and continued patient care, directly strengthen the healthcare system and benefit communities across the province.

Feedback specific to the Healthcare stream:

1. What do you see as the key strengths of the proposed approach for the new streams?

Home Care Ontario Response:

- The streamlining from eight streams to four simplifies the immigration journey for applicants and reduces complexity for employers, making it easier to establish processes that support these pathways.
- The introduction of a dedicated healthcare stream is an excellent step. It would be even more impactful if this stream prioritized higher quotas for rural and remote locations where healthcare positions are hardest to fill.
- Offering accelerated pathways to permanent residency for candidates, especially for those accepting rural placements, would even further address critical shortages.
- Classifying applicants by Training, Education, Experience, and Responsibilities (TEER) level rather than a wider set of program criteria keeps the focus on the role, not the individual applicant. This aligns well with how our sector categorizes roles operationally (e.g., regulated nursing, unregulated support roles, etc.).

- The new more uniform eligibility and assessment model allows organizations to proactively plan recruitment, better understand the likelihood of success, and reduce the uncertainty associated with annual or ad-hoc policy changes.
- The Priority Healthcare Stream is a significant advantage. It removes an unnecessary administrative step, allowing nurses and other regulated professionals to be nominated more quickly. This supports faster recruitment for urgently needed healthcare professionals.

2. What potential limitations or risks do you foresee with the proposed approach?

Home Care Ontario Response:

- The Priority Healthcare Stream should include both high-wage and low-wage healthcare workers, as well as paraprofessionals, to ensure comprehensive coverage of labour needs.
- Recent Immigration and Refugee Protection Regulations (IRRP) feedback about National Occupational Classification (NOCs) for PSWs revealed that, even though home care PSWs complete the exact same duties as a PSW in a long-term care (LTC) setting, the NOC for home care is a TEER 4 role versus the NOC for LTC. Under the proposed framework, there is currently no dedicated pathway for these essential roles.
- Phase 1 of the proposed changes divides the employer job offer stream into two tracks: TEER 0-3 and TEER 4-5. Under the current NOC framework, PSWs and equivalent roles working in institutional settings (e.g., LTC or hospitals) are under NOC 3 and would fall into the first track, whereas home care provider occupations are under NOC 4 and would fall into the second track. While the 4-5 track has less stringent requirements, this distinction may create an unintended structural preference for institutional settings over home and community care.
- Also, if PSWs/HSWs are deprioritized relative to regulated professions and Express Entry, the majority of the home care sector's employees may have reduced opportunities to receive nominations or renew their work permits.
- Ontario Health's December 9, 2025 webinar emphasized that Express Entry applications will be prioritized. Most PSWs and HSWs have lower Comprehensive Ranking System (CRS) scores and are unlikely to receive an Invitation to Apply (ITA) compared to Express Entry, leaving them with fewer options. This creates a potential retention risk for employers who rely heavily on these workers.
- If the redesigned system prioritizes specific regions with labour shortages, *existing* employees—many of whom are settled in the GTA and awaiting nomination—may feel pressured to relocate to remain eligible. This could disrupt service delivery in urban and suburban areas where turnover is already high.
- If PSWs and HSWs cannot access a dedicated nomination pathway, many may become ineligible for work permit extensions, forcing employers to terminate them. This poses

serious staffing and continuity of care risks in addition to the personal impact on the worker.

3. Are there any recommendations you would like to share regarding the application process under the proposed approach?

Home Care Ontario Response:

- Establish a dedicated PSW/HSW sub stream within TEER 4–5. Given the chronic shortages in both long-term care and home/community care, a dedicated high-volume pathway for PSWs/HSWs is critical. This would support sector stability, reduce service interruptions, and better reflect Ontario’s workforce needs.
- Provide a definitive interpretation of appropriate NOC codes for unregulated care providers to reduce the risk of unintentional ineligibility.
 - Introduce a “Healthcare” Priority Lane which would address the need for priority processing for the healthcare sector applicants needed to stabilize the workforce (with guaranteed 30-60-day processing timeline from Expression of Interest (EOI) to nomination. Use existing framework (e.g., Regional Economic Development through Immigration (REDI) or regional draws) to pilot this healthcare-specific approach across Ontario.
- The process could be more supportive and less burdensome for employers by:
 - Organizing more seminars and workshops to educate employers on program requirements.
 - Assigning dedicated account executives to assist employers with questions and provide guidance throughout the process.
 - Reducing the administrative burden caused by multiple audits.
 - Improving application flexibility for minor corrections post-submission.
- Rigid hourly minimums conflict with fluctuating healthcare staffing patterns.
- Introduce a Flexible Minimum-Hours Model
 - Consider more flexible or adaptable models for minimum hour requirements, taking into consideration the unique nature of the home healthcare sector. This would help employers, better meet the needs of both their employees and the community we serve.
 - Allow averaging hours (e.g., 4-week modules) or part-time eligibility across multiple OINP-approved sites.
 - Enable employers to jointly support EOIs for employees and lower the points for the healthcare workforce.
- Adjust the Median Wage
 - Median wage thresholds do not reflect rural/community cost realities, create locally adjusted median wage considering the community-based work.

- The funding models and wage differences between sectors, i.e., hospitals and LTC have an impact on the Home Care Sector and our ability to meet the median wage in some regions.
- Request that the full compensation grid is considered in decisions where starting rate is below the median wage.
- Enable Temporary Work Permit Extensions Pre-Nomination
 - Authorize employers to request extensions past current work permit expiry while waiting for OINP invitation/nomination, provided the employee remains compliant and initiated by the employer.
- Reduce Financial Burden on Applicants
 - Consider reducing financial barriers for community healthcare workers by providing more streamlined support for their applications.
 - Introduce standardized and capped legal fees; offer a bridged application paperwork process for ongoing employees.
 - As OINP looks to introduce its second phase focus on clinical staff in these proposed changes, the program should work directly with the licensing colleges (like Colleges of Nurses of Ontario-CNO) so that once someone is licensed, they move to the top of the list for Permanent Resident status. Moreover, the OINP could work with the CNO, who has the names and registration status of IENs across the province, and move them up the priority list (along with any others applying from outside the country who have also already satisfied CNO requirements).

4. Is there anything else you think OINP should consider as new streams are developed?

Home Care Ontario Response:

- To support immigrant women, consider funding childcare initiatives in rural areas where resources are limited. This would help families settle successfully and enable more women to participate in the workforce.
- Ensure balance between Express Entry prioritization and provincial labour needs. Express Entry prioritization risks leaving out frontline workers essential to Ontario's healthcare system. A balanced approach where highly skilled applicants are prioritized while high-need sectors like community care retain dedicated pathways, is important.

Home Care Ontario Feedback on the OINP Portal:

1. Overall experience

Home Care Ontario Response:

- The overall experience with the portal is positive as it allows employers to complete eligibility checks before submitting applications. However, we recommend:
 - Large healthcare organizations with multiple sites and employer contacts require more flexible, scalable administrative features within the OINP portal.
 - Instead of splitting the employer offer into two stages, allow the entire offer to be completed in one step. Employers could sign consent forms when the employee is invited.
 - Employees often expect a two-business-day turnaround after receiving invitations, creating pressure on employers. A streamlined process would alleviate this.
 - Enable employers to “unlock” an offer to correct typos instead of creating a new offer.
 - Add functionality to export an Excel file with all offer details for tracking stages (draft, offer, invitation, etc.).
 - The current two-step process (creating a draft job offer and then returning to the dashboard to find and edit/submit it) is - unnecessarily lengthy; users would prefer a single, continuous workflow from creation to submission.
 - The PIN process is challenging, once a PIN expires employers cannot resend or regenerate it, which creates confusion for employees and requires additional follow-up; allowing employers to resend or regenerate PINs and having more flexibility on invite deadlines, as the 14-day window can be shortened for employers who cannot access invites immediately.
 - Users have trouble tracking who has been invited when they cannot proceed with invite requirements, which makes communication with employees about timelines difficult.

2. Accessibility and usability

Home Care Ontario Response:

- The portal is generally user-friendly, and instructions are clear. However, entering repetitive business details for employees at the same location is time-consuming. We recommend allowing employers to group by location and then allowing them to enter stream, employee details, compensation, and NOC to speed up the process.
- We recommend allowing designated employer contacts (not only the signing officer) to sign consent forms, as it is operationally challenging for one signing officer to sign large volumes of applications across many sites.

- When OINP officers request updates, we would like officers to communicate directly with the listed employer contact to streamline follow-up on high volumes of files.
- Once a job offer is submitted, key fields (NOC code, wage, duties) are locked; even minor errors require either withdrawing and resubmitting the offer (restarting the process) or submitting a webform correction request that can take days, so the ability to edit limited fields post-submission would be ideal.
- Employers would benefit from better dashboard tools, including:
 - The ability to automatically proceed from creating the initial offer straight into full job offer submission without having to search the list again.
 - Filters to sort and search applications by contact name, date submitted, or status.
 - Clearer guidance for employees when PINs expire and/or functionality for employers to resend PINs.

3. Technical performance

Home Care Ontario Response:

Overall, technical performance is good, with few errors and smooth functioning after the first week of launch. **Additional improvements include:**

- The portal crashed during the first round of invitations, leaving employers with only a few days to complete submissions. When outages occur, we recommend extending the 14-day deadline to avoid negative impacts on businesses and employees.
- The reassignment of job offers (when an employer contact leaves the organization) is cumbersome at present as each job offer must be reassigned back to the signing officer and then to a new contact one by one. Users would benefit from a simpler bulk transfer function.
- Users would like automated emails (e.g., invites/nominations) to include the employee's name so they can quickly identify which file the notification relates to.
- Users have observed that when a draw occurs, the portal can go down for several days (up to a week), which disrupts timely processing and communication with employees.

Thank you for your consideration of Home Care Ontario's submission and we welcome the opportunity to discuss our feedback in greater detail.

Please contact Matt Drown, Director of Policy
 Home Care Ontario
 905-543-9474
matt.drown@homecareontario.ca