



January 27, 2020

Ontario Health Quality
130 Bloor St W,
Toronto, ON, M5S 1N5

**RE: CONSULTATION ON PROPOSED DRAFT QUALITY STANDARDS FOR CONCUSSION CARE
FOR PEOPLE AGE 5 YEARS AND OLDER, *JANUARY 2020***

The Ontario Society of Occupational Therapists is a professional association representing and serving over 4,400 occupational therapists in the province of Ontario. With a mandate to provide member services, to promote the profession of occupational therapy, to represent and advocate for the profession, and to support members' professional development, the Society operates as a registered not-for-profit corporation in the province.

Occupational therapists are regulated health professionals who work with people who experience health related barriers to managing day-to-day living skills. When faced with health issues such as chronic disease, disability, mental health issues, learning problems, injuries, illness, or the impacts of aging, occupational therapists can assist people to achieve, regain or retain skills they need to do what they want, and need, to so they are able to manage at home, succeed at school, adapt at work, recover in hospital, or participate in their community.

Occupational therapists work with children and adults who have sustained concussion and mild traumatic brain injuries (TBI) in a variety of settings including (but not limited to) hospitals, schools, the community, workplace and rehabilitation settings. Occupational therapists may be an individual's first contact with a healthcare provider through screening, education, scheduling of follow-up appointments in head injury/TBI clinics, and through emergency departments.

The draft Quality Standards apply directly to occupational therapists and will act to support best practices in the area of concussion care. The Society supports the six Quality Statements. Occupational therapists play a significant role in education, optimizing activities of daily living, and return to optimal functioning.

The Society and the profession are concerned with the ability to meet demand for services (Quality Standards 4 and 5), in terms of number and availability, within remote and rural areas,

with French speaking Ontarians, and with aboriginal populations. Access to timely assessment/diagnosis, education, and follow-up in large urban centres is a challenge, as a result of long waitlists, need for physician to make diagnosis, or restrictive eligibility criteria (must be treated within hospital to receive follow-up there). Consideration of research in the [*Consensus Statement on Concussion in Sport*](#), P. McCrory, et al., should be considered and incorporated into this document.

The Society is supportive of Quality Standard 6 (Education and Training for Health Care Providers) and will support Health Quality Ontario in implementing this Standard. OSOT, as many other professional associations, offer professional development opportunities to our members and would welcome a partnership with HQO in dissemination of these Standards. It would be helpful to either offer a standardized training program (e.g. online learning), or to provide reading lists and/or resources that can be disseminated to health care professionals. Education on the final Quality Standard would be important to ensure all health care professionals support implementing changes to their practice and the need for ongoing learning in this area.

To support dissemination, communication, and promotion of the adoption of this Quality Standard, please consider including a multi-pronged approach including the following:

- Journal articles
- Professional websites (including: professional associations, regulatory colleges, advocacy groups and diagnosis specific populations)
- Posters, print materials
- Webinars
- Profession specific education/training – including training at the university/college level for students
- Consumer groups (e.g. sports teams, schools (private and public), entertainment venues (e.g. rock climbing, community centres, etc.))
- Public promotion/education of Guide, symptoms, when to seek medical attention

In the implementation of the Quality Standards, encouragement should be placed on innovative ways to address the needs of a community, through Ontario Health Teams, integrated care, and innovative care models. Shifting to care outside of hospital institutions may be a cost-effective way of meeting demand for services. Extension of private insurance coverage to include services related to concussion care (e.g. occupational therapy), or group treatment models, may prove helpful.

We thank you for the opportunity to forward comments on the proposed Quality Standards.
Please do not hesitate to contact me should you have need for clarification of any of our points.

Sincerely,

A handwritten signature in black ink that reads "Christie Brenchley". The signature is fluid and cursive, with a large loop at the end of the last name.

Christie Brenchley
Executive Director

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Learn more about Occupational Therapy at www.OTOntario.ca

