Date:

Address/email of recipient:

Dear [name],

**RE: 2023 Eckler Report recommendations for the occupational therapist pay scale on Family Health Teams and Community Health Centres.**

As a member of [In support of] the [Ontario Society of Occupational Therapists (OSOT)](https://www.osot.on.ca/) which represents over 4,700 professional members in the province, we/I express concerns about the health care system and those working within it. Ontarians need more occupational therapists working in primary care, home and community care, and hospitals to ensure the population’s health care needs are met now and into the future.

The Ontario Society of Occupational Therapists represents occupational therapists (OTs) through advocacy, professional development, member services, and practice support. As regulated health care professionals, OTs work in various settings such as Family Health Teams (FHTs), Community Health Centres (CHCs), schools, clinics, hospitals, home care, and rehabilitation centers. The primary focus of occupational therapy is to provide holistic support to individuals and groups to engage them in daily activities, which may include dressing, working, social engagement, and coping with anxiety and stress.

The current health human resource crisis has increased the need for all health care professionals to collaborate and contribute to our health care system. We no longer can sit back and hold a few professions responsible for health care. With the Ontario government’s focus on physicians, nurses, and personal support workers, they are forgetting nearly 100,000 other health professionals who have, and continue to, support the health care system. Occupational therapy is a key service and needs attention now!

Background

Occupational therapists are Masters educated professionals with a **versatile** scope of practice including activities that overlap with other health professions making them able to address multiple issues in one patient interaction. OTs can perform the [Controlled Acts of Psychotherapy and Acupuncture](https://www.coto.org/standards-and-resources/resources/controlled-acts-and-delegation#f0ceb48d-770a-46a8-bd64-4edae2cd02a1) and can be delegated other Controlled Acts such as oxygen titration, setting a fracture, wound debridement, etc., based on training and competence. **This makes OTs an excellent and flexible part of any multidisciplinary team.**

The November 2023 Eckler Report, “[Ontario Community Health Compensation Market Salary Review](https://amho.ca/wp-content/uploads/2023/12/Ontario-Community-Health-Compensation-Study.pdf)” (commissioned by organizations representing primary care, home and community care, and long-term care) identifies that the current compensation for 89% of roles on FHTs/CHCs **are below recommended rates**. For occupational therapy, the Report identifies rates that also fall below [OPSEU rates](https://opseu.org/wp-content/uploads/2023/09/OPSEU-SEFPO-OHA-Wage-Reopener-P.E.-Grids-communication.pdf) and can be as much as $13 per hour lower. Given the versatility and skill set of the profession, the level of education required to become a registered OT, and compared to equally qualified professions, **the report recommendations have placed occupational therapists too low on the pay scale for Family Health Teams and Community Health Centres.**

Our health care industry is facing a human resource crisis with a shortage of workers due to many factors of which lower compensation is a significant reason. The Eckler Report, along with various other reports, suggest pay is a key issue related to the recruitment and retention of staff. We urge the Ontario government to ensure that the profession of occupational therapy is appropriately valued and compensated in FHTs and CHCs. It is crucial to maintain the profession's significance, importance, and contribution to health care in Ontario to ensure the current and future needs of all Ontarians can be met. With an aging population forecasted to increase as much as 15% in the next 5 years, occupational therapists are desperately needed to increase safety and optimize function at home while reducing emergency department visits and hospital and long-term care admissions.

Concerns with the Eckler Report

* For over a decade the [Association of Family Health Teams of Ontario (AFHTO)](https://www.afhto.ca/) has identified occupational therapy to be at the same compensation level as physiotherapy (PTs), social work (masters), case workers/managers, and registered nurses as seen in previous reports:
  + 2017 - [Korn Ferry Hay Group report](https://www.afhto.ca/sites/default/files/wp-content/uploads/2017-Market-Refresh-Report-February-20-2018.pdf)
  + 2014 - AFHTO [Primary Care Recruitment and Retention Strategy for Ontario](https://www.afhto.ca/sites/default/files/wp-content/uploads/Toward-a-Primary-Care-Recruitment-and-Retention-Strategy-January-2014.pdf)
  + 2012 – AFHTO - [Toward a Primary Care Recruitment and Retention Strategy For Ontario](https://www.afhto.ca/sites/default/files/wp-content/uploads/AFHTO-AOHC-NPAO-Recruitment-Retention-Report-2012-02-06.pdf)

However, the 2023 Eckler Report separates occupational therapy and places the profession in a lower pay band (band 8) compared to these other professions (band 8\*).

* Previous pay levels have been set according to educational level requirements, services provided, level of accountability and responsibility of role, etc. which have not changed significantly in recent years. The regulated professions (occupational therapy, physiotherapy, social work and nurses) all have access to performing high-risk procedures through the [*Regulated Health Professions Act’s (1991)*](https://www.canlii.org/en/on/laws/stat/so-1991-c-18/latest/so-1991-c-18.html) Controlled Acts and require a Master's degree (except nursing which is a bachelor's degree). Professions with similar educational requirements should be paid equally.
* The Market Exceptions & Band Analysis Details portion of the report is inaccurate in that Eckler is referencing OPSEU rates, however, the [OPSEU Pay Equity Adjusted OPSEU Central Wage Rates](https://opseu.org/wp-content/uploads/2023/09/OPSEU-SEFPO-OHA-Wage-Reopener-P.E.-Grids-communication.pdf) indicate that OTs and PTs are paid the same effective April 2021 to April 2024.
* Eckler has utilized data collected from participants and created recommendations based on extrapolations rather than using publicly available compensation bands.
* The Eckler report, among other reports, identifies occupational therapy as a needed profession that is challenging to recruit and retain. For this reason, compensation must be used as a tool to ensure patient needs are met through appropriate occupational therapy staffing levels. Pay equity, compared with other health care sectors, is needed to ensure OTs are drawn onto FHTs and CHSs rather than away from them.
* According to the salary data provided by our members, OTs working in FHTs and CHCs have historically received compensation at a similar level or pay band as PTs.

Budget Recommendations

It is recommended that the government consider either of the following in their 2024-2025 budget:

* Placing occupational therapists in the same salary band as professional peers would require approximately **$1,120,000.**
* With approximately 100 OTs working in primary care in Ontario, it would take **$2.4 million** to bring occupational therapists on Family Health Teams and Community Health Centres up to wage parity with their OPSEU hospital counterparts ($13/hour x 37-hour work week x 96 OTs).

We do not support the recommendations in the Eckler Report that refer to occupational therapy compensation and advocate for a salary that acknowledges the profession’s education and contributions to the health care system, that which is equal to our peer physiotherapists and social workers.

If you would like additional information about occupational therapy in Ontario or wish to discuss the contents of this letter, please contact [Marnie Lofsky](mailto:mlofsky@osot.on.ca), Executive Director, the Ontario Society of Occupational Therapists.

Thank you,

[name and contact information]