

The Ontario Society of Occupational Therapists' feedback to proposed Regulation Changes

Date: March 3, 2023

Tracking Number: 23-HLTC001

Subject: [Ontario Regulation 246/22](#)

Introduction:

The [Ontario Society of Occupational Therapists](#) (OSOT) is an organization that represents the interests of over 4,600 members through advocacy, professional development, member services, and other career development capacities in Ontario. As a health care association and stakeholder in long-term care homes, participation in this proposal is essential to ensure that barriers to resident safety, quality of care, health care professionals' full scope of practice, and others are removed.

The role of occupational therapy in long-term care is currently limited under the current [program and support services policy](#), whereby occupational therapists (OTs) are unable to work to their full scope of practice. Our recommendations focus on specific regulations in the *Fixing Long-Term Care Act, 2021*, and emphasize the need for further clarification on required programs, care and services, and staffing specifications.

Recommendations for the proposed amendments:

Proposed Amendments to Regulation in O. Reg 246/22	OSOT's Proposed Changes
<p>Required programs Falls prevention and management (Section 54 in O. Reg. 246/22)</p>	<ul style="list-style-type: none"> Require licensees to ensure a post-fall assessment is mandatory after a resident sustains a fall; Add occupational therapists to the list of providers that can complete a post-fall assessment and provide falls prevention and management for residents.
<p>Staffing Qualifications Provide that a personal support worker who has received training in the administration of drugs and who has been authorized by a member of the registered nursing staff may administer drugs to residents where it is not a controlled act.</p>	<ul style="list-style-type: none"> Personal support workers (PSWs) are not regulated health care professionals and not trained to perform this restricted activity; There is no accountability or regulatory body that can discipline PSWs should errors or omissions occur; Regulated health care professionals are already permitted to administer drugs through delegation according to the RHPA, no further mention is required. Regulated health care professionals can be used to free up nurses to engage in other priority tasks.

Additional recommendations for changes to O. Reg 246/22:

- Clarify expectations for the current 36 minutes per day of allied health services to include a minimum of 7 minutes per day per resident of occupational therapy services. This aligns with [OSOT's 2019 Long-Term Care Home Staffing Review](#) outlining the recommendation of 21 hours a week per 180-bed home for occupational therapy services.
 - o **Rationale:** OTs are resident-focused and are equipped with the necessary skills to provide appropriate interventions. Please see OSOT's [Long-Term Care Home Staffing Review](#) for details on the value of occupational therapy in long-term care homes to reduce resident falls; reduce the need for nursing and PSW support; and improve residents independence and quality of life.

- Promote allied health professionals (including occupational therapy) to work to their full scope of practice.
 - o **Rationale:** To support nursing and PSW staff by addressing resident needs. For example, OTs have the skills to increase resident independence in daily activities such as dressing and mobility. This will reduce the demands placed on nursing and PSW staff. **Rationale:** Leaders in long-term care homes may not be aware of the unique care perspectives each health care practitioner provides. Multidisciplinary teams can be helpful in creating multifaceted approaches to treatment and care for residents.

Useful links:

[Input to Long-Term Care Home Staffing Review](#)

[Occupational therapy is a key part of improving long-term care in Ontario](#)

[Occupational Therapy and Behavioural Symptoms of Dementia](#)

Occupational therapy is a well-rounded health care profession that can improve the quality of life for residents. The recommendations outlined above have provided some insight and resources in the hopes to continue the discussion on improving long-term care in Ontario. Our organization will continue to strive to practice the full scope of occupational therapy as a key stakeholder in health care.

OSOT appreciates the opportunity to participate in this proposal and is open to discussing our recommendations further. Should any questions arise, please reach out to Marnie Lofsky, Executive Director for the Ontario Society of Occupational Therapists at mlofsky@osot.on.ca.

Thank you,



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