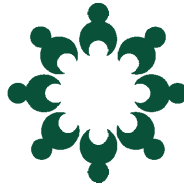


**The Council
on Aging
of Ottawa**



**Le Conseil sur
le vieillissement
d'Ottawa**

**Submission to the Minister Responsible for Seniors (Ontario Seniors' Secretariat)
on Proposed Initial Draft Regulations
made under the *Retirement Homes Act, 2010***

April 8, 2011

The Council on Aging of Ottawa
101-1247 Kilborn Place
Ottawa, Ontario
www.coaottawa.ca

ABOUT US

The Council on Aging of Ottawa is a bilingual, non-profit, voluntary organization dedicated to enhancing the quality of life for all seniors in Ottawa. We work for and with seniors in the community to voice issues and concerns to all levels of government and to the general public.

The Council on Aging, through the work of its Board of Directors, committees, task forces, working groups and staff:

- provides expertise on seniors' issues;
- promotes development of effective programs and services for seniors;
- serves as a partner in the planning and coordination of seniors' services;
- speaks to government on policy and funding priorities;
- promotes public understanding of seniors' issues.

Since 1975, the COA has acted as the voice of seniors in Ottawa. We communicate with media to increase awareness of the concerns of seniors. We also work with our partners to establish coordinated responses to seniors' issues such as elder abuse, housing, transportation and health care.

In addition to producing written educational materials in the form of brochures and guides, such as *In and Out of Hospital*, *Guide for Selecting a Long Term Care Facility* and *Fact Book on Aging*, we publish *The Bulletin*, a periodical on topics ranging from ageism to end-of-life concerns. Furthermore, the COA regularly holds public education seminars, Lunch and Learn sessions and forums on a variety of issues pertinent to seniors.

Based on our thirty-five year track record as the voice of seniors in Ottawa, we welcome the opportunity to contribute our comments on retirement home regulations to the Standing Committee on Social Policy.

BACKGROUND

The Council on Aging of Ottawa has advocated for retirement home regulations since the late 1980s. Presentations were made to the provincial government on its 1990 public consultation paper, “Redirection of Long Term Care and Support Services”, followed by the 1993 Lightman Commission Report, and the 1994 response to Bill 173. In 2000 and 2007, a Council on Aging of Ottawa Task Force further presented reports on the need for retirement home regulations to the provincial government to protect seniors and their families.

The necessity of retirement home regulations to protect all seniors and especially vulnerable seniors and their families cannot be overstated. Retirement homes are increasingly becoming an option as community supports are inadequate to support seniors to remain in their own homes. With Ontario's senior population expected to double to nearly 4.1 million within 25 years, retirement homes are currently filling a need for older adults who wish to remain at home but cannot, are in hospitals deteriorating physically and mentally so they cannot return home, or are waiting for placement in a licensed long term care home with less than a 3% vacancy rate.

While it may be said that some independent seniors choose to move into retirement homes as a lifestyle choice, many seniors cannot afford retirement home living or are in need of personal and nursing care and choose a retirement home as the only practical, available and immediate option. For vulnerable, low-income seniors, their choice is to remain in the community at risk or deteriorate in the hospital awaiting a long term care bed.

The exact amount of nursing and personal care that seniors are receiving in retirement homes remains unclear. What is clear is that in Champlain (Ottawa included) as of February 2011, close to 30% of clients served by the Community Care Access Centre (CCAC) resided in retirement homes. Of those seniors living in retirement homes and receiving services from the CCAC, 40% had a very high or a high MAPLe Score (Method for Assigning Priority Levels). This level of care is equivalent to those residents residing in licensed long term care homes. Another 22% of the residents had a moderate MAPLe score indicative of being at risk of requiring long term care admission. Research has demonstrated that clients in the higher MAPLe levels are more likely to be admitted to a residential care facility within 90 days than those in the low-priority groups.¹ Clearly, retirement homes are increasingly operating in a resident heavier care environment comparable to that of long term care facilities.

¹ CCAC data from the Champlain region as of February 2011

THE COUNCIL ON AGING OF OTTAWA'S POSITION

1. Retirement Homes Regulatory Authority (RHRA) responsibility and licensing

Given the diversity of clients' needs living in retirement homes, the government should introduce a system of graduated licensing, according to the level of assistance being provided to the resident.

- i. Basic – room and board, housekeeping
- ii. Intermediate – room and board, housekeeping , medication administration and bathing assistance
- iii. Advanced – room and board, housekeeping, medication administration, bathing assistance and specialized care such as dementia care and end-of-life care

A licensing authority must ensure that operators only admit and care for residents per their licensed designation through regular inspections. Licenses should be revoked if a facility does not adhere to licensing standards.

Where care is provided in the retirement home, resident care providers should be fully qualified to do so by virtue of skills, education and work experiences.

We support the recommendations of CARP (Canada's Association for the FiftyPlus) that there should be obligations to support existing residents in retirement homes as they transition to higher levels of care, and protection in the event of home closure.

2. Service agreement for all services provided

Retirement homes must fully disclose what they do and do not offer in their care plans and cost of services. To ensure transparencies in cost, residents and external publicly funded service providers such as Community Care Access Centre (CCAC) must be aware of the range of services paid for as part of a resident's care plan, as well as who is responsible for payment of services. This is to avoid duplication or overlap in service provision from outside agencies for the efficient use of public funds.

3. Rate subsidies

The cost of retirement homes varies significantly. Vulnerable seniors with low incomes should be given an opportunity to participate in and benefit from the retirement home sector. As part of this new graduated licensing system, it is imperative that the government introduces a rate subsidy program for low-income seniors.

4. Standardized assessment tool

A standardized assessment tool should be used in all licensed retirement homes in the province of Ontario. We recommend the use of an existing, validated common measurement tool, such as the interRAI Community Health Assessment (CHA), to ensure that all residents receive the support they require. The CHA was developed in response to user requests for a modular instrument that could efficiently assess the well elderly individual and identify those persons who merit further assessment in order to prevent or stabilize early functional or health decline. The CHA contains a brief basic assessment and three supplements: functional supplement, assisted living, and mental health.²

The frequency of assessment should be at least annually for residents living in a Basic licensed retirement home, semi-annually in an Intermediate licensed retirement home and quarterly in an Advanced licensed retirement home.

5. Standardized appeal process

When disagreements arise between the parties, including regulatory agents, a third-party standardized appeal process should be used that is client focused, simple, cost effective and collaborative in nature.

CONCLUSION

The desire to protect vulnerable seniors and clarify the true cost of care and accommodation must be balanced with the recognition that retirement homes are currently necessary and are filling an important need. We support retirement homes of all sizes that provide care and basic support, and regulations must not unduly push smaller retirement homes out of business or make the operation of these homes unmanageable.

We support the objectives and intent of the proposed legislation, and the government should be recognized for taking a step in the right direction. As the voice of seniors in Ottawa, we strongly urge you to support and implement the recommendations in this submission which will raise the standards of quality and accountability for seniors living in retirement homes.

² <http://www.interrai.org/section/view/?fnode=14>