

# OANHSS

ONTARIO ASSOCIATION OF NON-PROFIT HOMES AND SERVICES FOR SENIORS

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May 6, 2011

Dr. Vasanthi Srinivasan  
Assistant Deputy Minister  
Health System Strategy Division  
Ministry of Health and Long-Term Care  
8<sup>th</sup> Floor, Hepburn Block  
80 Grosvenor Street  
Toronto, ON M7A 1R3

Dear Dr. Srinivasan:

**Re: Proposed Amendments to O.Reg 79/10 (No. 11-HLTC026)**

The Ontario Association of Non-Profit Homes and Services for Seniors (OANHSS) appreciates the opportunity to submit our comments on the proposed amendments to the Regulation under the *Long-Term Care Homes Act, 2007* (LTCHA).

OANHSS is the provincial association representing not-for-profit municipal and charitable long term care homes, non-profit nursing homes, seniors' housing projects and community service agencies. Member organizations operate over 27,000 long term care beds and over 5,000 seniors' housing units across the province.

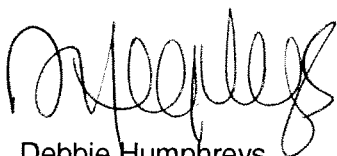
Set out below are our comments with respect to each of the 12 proposed amendments to the Regulation.

1. Amendment to section 9: While the proposed change does reduce some of the burden on long term care homes, section 9 still requires long term care homes to have audible door alarm systems on stairwell doors. Many homes do not have audible door alarms on stairwell doors and no such requirement was imposed on homes built under the 1999 Design Guidelines. The requirement is also beyond those specified in the 2009 Design Manual for homes; consequently, even some newly built or renovated homes will have to incur expense to make the changes. Given the costly nature of the requirement for an audible door alarm system on doors leading to stairwells, we recommend that the Ministry of Health and Long-Term Care provide appropriate funding for this capital requirement.
2. Amendment to section 10: OANHSS supports this proposed amendment, subject to a recommendation with respect to B and C homes. These homes will likely not be rebuilt by the proposed December 31, 2014 deadline; therefore, we recommend that the deadline for compliance be extended to the completion date of the rebuild for those B and C homes that will not be rebuilt by December 2014.

3. Amendment to section 16: OANHSS supports this proposed amendment. However, the change will require even some newly built homes to modify their window mechanisms; thus, we recommend that the Ministry of Health and Long-Term Care provide appropriate funding for this capital requirement.
4. Amendment to section 18: OANHSS supports this proposed amendment.
5. Amendment to section 19: While this extension does provide some relief to the specified homes, section 19 states that homes must have a generator available to maintain the “heating system” in the event of a power outage. We are concerned that this provision appears to require homes to have a generator capable of heating the *entire* home (i.e. a generator that keeps the full HVAC system running) and we recommend that the Ministry of Health and Long-Term Care provide appropriate funding for this capital requirement.
6. Amendment to section 87(2)(b): OANHSS supports this proposed amendment.
7. Amendment to section 97: OANHSS supports this proposed amendment.
8. Amendment to section 107(3): OANHSS supports this proposed amendment.
9. Amendment to section 110(6): OANHSS supports this proposed amendment.
10. Amendment to section 202: OANHSS supports this proposed amendment.
11. Amendment to section 224: OANHSS recommends that only those homes engaged in non-arms length relationships be required to include a definition of the same. We further recommend that the Ministry of Health and Long-Term Care provide a plain language definition so that definition has meaning for the resident and his/her SDM.
12. Amendment to section 318(1): OANHSS supports this proposed amendment.

The LTCHA and its Regulation has required significant changes to the administration and operations of homes. To ensure effective implementation, we recommend that the Ministry recognize the financial and operational burden on homes and take steps to provide appropriate funding for capital requirements from a dedicated funding envelope.

Sincerely,



Debbie Humphreys,  
Acting Chief Executive Officer