



Nurse Practitioner-led Clinic  
**ASSOCIATION**

A corporate member of NPAO



association of family  
health teams of ontario



Alliance for Healthier Communities  
Alliance pour des communautés en santé



INDIGENOUS  
PRIMARY  
HEALTH CARE  
COUNCIL

## Submission to the Standing Committee on Social Policy

Submitted in partnership with the Association of Family Physicians (AFHTO), Alliance for Healthier Communities, Indigenous Primary Health Care Council (IPHCC) and Nurse Practitioner-Led Clinic Association (NPLCA)

Re: Bill 60, *Your Health Act*, 2023

March 27, 2023

For many Ontarians, primary health care is the entryway into the healthcare system. It takes a team of health professionals who can provide convenient and high-quality health and social services to deliver the best care possible for patients.

As partners, we are aligned with the government’s goal to increase access to services for Ontarians. Bill 60, *Your Health Act*, 2023 is part of this initiative. We are committed to working with the government on health policy that will uphold the principles necessary to provide Ontarians with the care they need. This submission highlights further clarification and recommendations regarding Bill 60 to ensure an equitable and sustainable approach to the delivery of care provided under this act.

## Response to *Your Health Act*, 2023

We are aligned with the intention of the proposed *Your Health Act*, 2023 to make care more accessible, connected and convenient for Ontarians. However, to ensure we are continuing to build a healthcare system that is equitable and accessible, we are asking for further clarification on the following areas in **Schedules 1 and 2 of the *Your Health Act*, 2023**.

### Clarification 1: Definition of “integrated community health services centre”

We are seeking further clarification to the definition of **“integrated community health services centre” means, subject to any exemptions set out in the regulations, (b) a health facility, including a community surgical and diagnostic centre, or a class of health facilities, that is prescribed; (“centre de services de santé communautaire intégré”)**

Specifically, we are seeking further explanation about what **“a class of health facilities, that is prescribed”** means.

Furthermore, we would like confirmation that integrated community health service centres will focus on surgical and diagnostic centres to relieve the backlog of designated procedures

aligned to the government's commitments and plans and not extend into other areas of health care provision such as primary care.

Further regulations and information should be considered to provide specific restrictions to what integrated community health service centres looks like to avoid potential risk to the existing and future public systems.

### **Clarification 2: Regulated Professions Amendments and liability concerns**

We are seeking further clarification on the "as of right" rule which would allow healthcare workers licensed in other provinces work in Ontario without registering with the Ontario colleges. We are concerned regarding the liability of practice of these healthcare workers who are awaiting registration with an Ontario regulatory college but are providing care to patients under this act.

We support all efforts to improve the current health human resources shortages in Ontario. We are seeking further clarifications of who would be responsible and liable for the credentialing of these out-of-province workers should an adverse event or issue arise.

### **Clarification 3: Protecting public health human resources**

We appreciate the government including the requirement of "***(e) a detailed staffing model for the proposed integrated community health services centre and evidence of the sustainability of this model and the public commitment to protect the HHR in the public system***".

We are seeking clarification on how the government plans to enforce this requirement. Further information on the implementation of this requirement will be significant to support the retention of public health human resources in the healthcare workforce who work in primary care.

### **Clarification 4: Ensuring integration and connectivity with the public health care system**

Access to proper follow up and post-op care can have a major impact on the outcomes for patients. We recognize the inclusion of "***(g) the potential impact on the co-ordination of health services, based on consultations with health system partners;***".

We would appreciate further clarity on the government's intentions to require these clinics delivering health services to integrate with health system partners. The government will need to consider the impacts on the public system and provide requirements for integration and reporting procedures for a truly co-ordinated approach to care.

### **Clarification 5: Equitable access to care for Ontarians**

We are pleased to see that the principles of equity are built into amendments of the act; "***(h) a description of how the proposed integrated community health services centre will address the health equity needs of diverse, vulnerable, priority and underserved populations, taking into account linguistic needs, in the region specified in the call for applications;***"

As encouraged through our continued work with the government, we will need to make it clear that no one is left behind due to inequitable barriers to accessing health care. The government must ensure that the expanded access to publicly funded health care is patient-centred and that access to care will consider the needs of diverse, vulnerable and underserved populations. We request a specific focus on ensuring Indigenous communities have access to culturally safe care, Francophones can access services in French, and all marginalized populations are also provided with convenient, connected and coordinated health care services at no cost to patients.

As we continue to work with the government towards implementing the amendments outlined in the *Your Health Act, 2023*, we must work together to ensure that the Government of Ontario, in partnership with leaders in primary health care, continues to support those who work in primary care teams to improve health outcomes for Ontarians.

Thank you for your consideration.

For Information, please contact:

Bryn Hamilton, Interim CEO, AFHTO

The [Association of Family Health Teams of Ontario](#) (AFHTO) is a not-for-profit association that provides leadership to promote high-quality, comprehensive, well-integrated interprofessional primary care for the benefit of all Ontarians. We are an advocate and resource for family health teams, nurse practitioner-led clinics, and other interprofessional models.

The [Alliance for Healthier Communities](#) (Alliance) is the voice of a vibrant network of over 100 community-governed comprehensive primary health care organizations across Ontario, including Community Health Centres, Indigenous Primary Healthcare Organizations - Community Family Health Teams, and Nurse Practitioner-Led Clinics. Alliance members share commitments to advancing health equity through interprofessional comprehensive primary health care.

The [Nurse Practitioner-Led Clinic Association](#) (NPLCA) is the voice of nurse practitioner-led clinics (NPLCs) across Ontario. Nurse practitioners are the lead primary care providers of these interprofessional teams that improve the quality of care through enhanced health promotion, disease prevention, primary mental health care, and chronic disease management, while supporting care coordination and navigation of the healthcare system.

The [Indigenous Primary Health Care Council](#) (IPHCC) is an Indigenous-governed, culture-based, and Indigenous-informed organization. Its key mandate is to support the advancement and evolution of Indigenous primary health care services provision and planning throughout Ontario. Membership includes Indigenous Primary Health Care Organizations across the province.