



March 28, 2022

Hon. Jean-Yves Duclos, minister of health  
House of Commons  
Ottawa, Ont. K1A 0A6  
Sent via email: [jean-yves.duclos@parl.gc.ca](mailto:jean-yves.duclos@parl.gc.ca)

**Re: National long-term care standards**

Dear Minister Duclos,

The COVID-19 pandemic has exposed the fragility of Canada's long-term care (LTC) sector. To date, more than 16,000 nursing and retirement home residents in Canada have died of COVID-19. As you know, the Canadian Armed Forces and the Canadian Red Cross were brought into LTC homes in Ontario and Quebec in 2020 to help deal with the most catastrophic examples of system failure.

For many years, the Registered Nurses' Association of Ontario (RNAO) has fiercely advocated for LTC reform in Canada. As the professional association representing over 48,000 registered nurses (RN), nurse practitioners (NP), and nursing students across Ontario, we have urged the federal government to establish national LTC standards and negotiate an agreement with the provinces and territories to implement same. Because of this, RNAO was pleased to see the prime minister's commitment to national LTC standards, as reflected in your mandate letter. And we agree that the federal government must support efforts to improve the quality and availability of LTC homes and beds, especially by working with provinces and territories to develop and embed national LTC standards in legislation such as a "Safe Long-Term Care Act".

However, we are greatly concerned about the proposed national LTC standards recently issued by the Health Standards Organization (HSO) for consultation. These proposed standards take the form of voluntary guidelines which are already familiar – indeed, commonplace – practices in the LTC sector. But they do not reflect the lesson that COVID-19 taught us – that the standards of care provided to LTC residents across the country must be vastly improved and made enforceable. Further, HSO's proposed standard fails altogether to address LTC staffing levels or staffing skill mix. This is surprising, given the clear consensus that any standard purporting to address quality of care of LTC residents must address the staffing of LTC homes.

On October 14, 2021, [RNAO issued a letter to Dr. Samir Sinha](#), the technical committee chair of HSO's LTC services standard initiative, outlining our recommendations. Yet these science-based recommendations are not reflected in HSO's draft standard. RNAO continues to urge that the national LTC standards must include the minimum staffing and skill mix mandates outlined in [RNAO's Nursing Home Basic Care Guarantee \(NHBCG\) LTC staffing formula](#). The NHBCG is based on evidence from a compilation of 35 reports related to staffing and funding models in long-term care, and was fully adopted by Ontario's Long-Term Care COVID-19 Commission.

Finally, RNAO is concerned about the federal government's commitment to negotiate agreements with provinces and territories to "develop national standards and a Safe Long-Term Care Act to ensure seniors get the care they deserve," according to your mandate letter. Respectfully, it is unclear how a standard comprised of voluntary guidelines targeted at LTC homes rather than at provinces and territories can satisfy the prime minister's commitment and your mandate.

LTC residents across Canada deserve safe, dignified care. COVID-19 illustrated for us, in the most heartbreaking way, that provincial and territorial health systems across Canada have failed to provide that standard of care. HSO's proposed national LTC standard will not correct this failure.

Minister Duclos, could you please advise what you plan to do to ensure that the national LTC standards include enforceable staffing and skill mix standards, to improve the quality of care in all LTC homes? Further, please advise how you will make sure that national LTC standards will be consistently enforced by the federal government and tied to negotiated agreements with provinces and territories.

Sincerely,

A handwritten signature in black ink that reads "Doris Grinspun". The signature is written in a cursive style with a long horizontal flourish underneath.

Dr. Doris Grinspun, RN, MSN, PhD,  
LLD(hon), Dr(hc), FAAN, FCAN, O.ONT  
Chief Executive Officer

Cc:

Leslee J. Thompson, chief executive officer, Health Standards Organization (HSO)

Dr. Samir K. Sinha, *CAN/HSO 21001:2022 Long-Term Care Services Standard* technical committee chair