



National Association
of Federal Retirees

Association nationale
des retraités fédéraux

March 28, 2022

Long-term Care Services Standard Technical Committee
Health Standards Organization
1150 Cyrville Road
Ottawa, ON, Canada
K1J 7S9

Dear Dr. Sinha,

The National Association of Federal Retirees represents approximately 170,000 retired members of the federal public service, as well as veterans of the Canadian Armed Forces and the RCMP, and their dependents and survivors. Federal Retirees has been advocating for the financial security, health and well-being of our members and all Canadians for nearly 60 years.

Our membership includes family members and caregivers, and long-term care residents, as well as Canadians who want to ensure that quality, safe long-term care options are available when and where they need it.

The deaths and tragedies that took place in long-term care during the pandemic are a call to transform this sector in Canada.

While not a direct service provider of long-term care, we appreciate the opportunity to share our input on the draft of the National Long-Term Care Services Standard, CAN/HSO 21001:2022 (E) Long-Term Care Services.

We recognize the priority given to the public engagement and consultation process by the Technical Committee, the feedback you received from over 18,000 Canadians, and the steps taken to ensure that feedback is reflected in the draft standards.

The new proposed draft national service standards provide a wide range of aspirational guidelines on various aspects of long-term care service delivery. However, our members have been clear that accountability, enforcement, and transparency are critical to assuring safety and improving outcomes in long-term care. On behalf of our members, we have several questions:

- What is the definition of accountability?
- What are the accountability mechanisms?

- How is success measured?
- What metrics will be used to assess the criteria?
- What does failure look like?
- How will assessments be reported back to the community?

The focus of Federal Retirees is the successful implementation and enforcement of national standards for long-term care and assuring accountability throughout.

The Technical Committee notes that “the challenges related to legislation, regulations, funding, accountability, and determining who can own and/or operate LTC home are by and large the responsibility of provincial and territorial governments. Addressing these challenges in partnership with the federal government will enable the successful implementation of this new national standards being developed by HSO’s LTC Services Standard Technical Committee.”

While important to quality improvement and best practice standards, voluntary accreditation has its limits. We share Dr. Sinha’s hope that the standard will serve as a blueprint to enable provincial, territorial, and federal action. Systemic change, public accountability and the successful implementation of national standards and their outcomes hinges upon action and commitment from the federal, provincial and territorial governments.

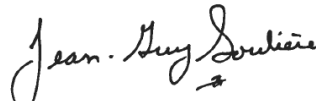
While some areas as noted above require clarification, the Committee has done substantial work that is valuable, informed by stakeholder consultation, and which deserves recognition. It is clearly up to all of us to continue to call for federal leadership to implement enforced principles and national standards for long-term care, tied to funding, and developed in collaboration with provincial and territorial governments, and for this federal government to fulfill its commitment of a new Safe Long-Term Care Act.

Thank you again for the opportunity to provide input.

Sincerely,



Anthony Pizzino
Chief Executive Officer
National Association of Federal Retirees



Jean-Guy Soulière
President
National Association of Federal Retirees