



**THERAPEUTIC RECREATION ONTARIO** 

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Ms. Sonnenberg:

In January of 2009, *Therapeutic Recreation Ontario* (TRO) was invited to participate in a ministry-sponsored roundtable discussion during the developmental stages of the Long-Term Care Homes Act regulations. As an acknowledged professional organization, TRO exists to direct and advance the profession in order to ensure quality professional services and to protect the rights of consumers receiving those services. Our presence at the roundtable discussion ensured that the voice of over 600 therapeutic recreation professionals in the Province of Ontario was actively incorporated into the new regulations.

Having received the proposed initial draft regulation, I would like to commend you and your ministry for the work you have done to date and thank you for the continued opportunity to engage with the ministry by providing written comments regarding **Part 2 of the Proposed Initial Draft Regulation**. TRO continues to be very excited to witness the development of the future phases of the legislation.

Upon a detailed review of **Part 2 of the proposed initial draft regulations**, TRO believes the ministry has accurately captured a number of critical details in the draft work. For instance, TRO commends the Ministry in identifying regulations to address resident safety and resident rights within the new draft of the LTCH Act. However, TRO would like to highlight a number of issues that we strongly believe could prove detrimental to the quality of services for residents living in long-term care. Specifically, TRO would like to draw your attention to our four main recommendations.

- **Greater detail is needed surrounding the provision of recreational and social activities as stipulated in the regulations.** TRO believes that the vague guidelines around Recreational and Social activities may lead to decreased access to recreation opportunities for residents, despite their ever-increasing care needs. In particular, TRO is particularly concerned about **the lack of staffing ratios** for recreation and social activities for Ontario's residents of LTCH's. Although the ratio stipulated in previous standards at 1:60 was a continual challenge to meet, omitting a specific ratio will place residents at a greater risk of having less staff to provide recreational and social activities and therapeutic recreation. TRO is of the opinion that not only should the ratio formula be included within the



regulations, but should also be enhanced to recommend greater staffing levels to meet the ever-increasing needs of all residents living in Ontario long-term care homes. We recommend the staffing ratio be included in the regulations and be enhanced to 1:40.

- **Resolve incongruity between the definitions of Recreation Therapy in the CIHI MDS RAI documentation and the proposed draft LTCH Act regulations.** The new (March 2009) CIHI definition of recreation therapy has provided the recreation therapy field with much needed guidance relating to practice in each provincial home, and has proceeded to raise the bar for Recreation service to residents and provide a more consistent delivery of recreation services across the province. Please see page 5 of this document for the CIHI definition of Recreation Therapy
- **Greater clarity is needed surrounding the role of "lead" as outlined in several regulations.** TRO believes that all involved would benefit from greater clarity around this role, and the inclusion of a staffing formula to determine the amount of "lead" time required by the various "lead" positions.
- **Enhanced mandate for educational development for existing LTCH personnel.** For those individuals who do not currently meet the proposed educational requirements as listed throughout the proposed regulations TRO recommends funding for new educational standards (transitional funding for the homes to meet new requirements) with a stipulated sunset clause as seen in various regulations for new hires.

**The following paragraphs address specific regulations by number.**

### **17. General Requirements**

In keeping with the TRO Standards of Practice, TRO recognizes their professional members' responsibilities in regard to the development and maintenance of an extensive written description of the recreation program within the home, including, but not limited to, program goals and objectives. In addition, TRO recognizes the need for their professional members to review this written description on an annual basis with an eye to ongoing quality improvements and continual program improvements.

Each TRO professional member is required by their professional Standards of Practice to engage in ongoing Program Quality Assurance (review and evaluation, regulation 17. 3) and will subsequently strive to achieve enhanced service to clients as a result of this established practice competency.

### **35. Restorative Care**

TRO recognizes their professional members' responsibility to an interdisciplinary program supporting the restorative care philosophy required under subsection 9.1 of the act. Recreation therapy practitioners embrace the restorative care philosophy and practice implications as per TRO Standards of Practice and the TR Scope of Practice.

As evidenced by TRO's Philosophical statement (below), TRO strongly supports the restorative care philosophy.

### **Philosophical Statement for TRO**

The purpose of Recreation Therapy is to enable all individuals to achieve quality of life, and optimal health through meaningful experiences in recreation and leisure. We believe in the inherent capacities of individuals for personal growth, happiness and freedom. Recreation Therapy is a profession which provides service to, and advocates for individuals with physical, mental, social, behavioural or emotional limitations in a variety of settings such as hospitals, long-term care settings, day programs, community-based programs, and mental health centres. The Recreation Therapy profession recognizes the right of all citizens to have access to and the freedom to choose recreation and leisure opportunities regardless of their physical, financial, developmental, emotional, or social challenges OR the barriers imposed on them by society at large.

The foundation of the Recreation Therapy profession is the establishment of authentic relationships with the individual receiving services and all other key stakeholders. Utilizing a collaborative approach, Recreation Therapy follows a systematic process of assessment, goal-setting, program/intervention development, individual and group facilitation, documentation, and evaluation. Programs are designed to promote independent functioning within the physical, emotional, mental, spiritual, behavioural and social domains, and to educate individuals about the skills and resources required to participate in recreation and leisure. The Recreation Therapy profession utilizes evidence-based practice to create outcome-based interventions suitable to the client's abilities. As part of its advocacy, Recreation Therapy is committed to educating society about the rights and capacities of all citizens to participate in recreation and leisure.

### **37. Therapy services**

This regulation stipulates specific therapy services (PT, OT and SLP) are to be available to the residents in homes and although 37c indicates "other therapies,"

- TRO recommends that "Recreation Therapy" is listed in 37 (a) or (b) along with the other therapies.

### **39. Therapy services staff qualifications**

TRO supports the Therapy services staff qualifications, regulation 39 (1, 2 & 3), specifically (3) referring to existing support personnel already enrolled in a program, completing restorative care training (if not already qualified) at the time legislation comes into force. In addition,

- TRO recommends existing personnel (without educational qualifications) also engage in appropriate training.
- TRO recommends the development of a standardized "restorative care" educational program across the province (i.e. in conjunction with the MTCU, as per other training programs listed in the regulations such as PSW and Food Services Worker). At present, the restorative care certificate training programs are diverse in quantity, quality and measurable outcomes. In turn, restorative care philosophies across LTC homes in the province also vary in their quantity, quality and measurable outcomes.

## 42. Designated Lead

(42. 1, 2 a,b,i,ii) TRO strongly endorses this regulation as past practice has often been that of the manager of recreation acting in a leadership capacity of other therapies including social services work. In addition,

- TRO recommends that the designated lead also have a specific staffing ratio formula designated in order to adequately manage all of the therapies (PT, OT, SLP and Recreation Therapy) and Social Work services in the home. This role may potentially also lead volunteer services and Religious and spiritual care services. As a potential lead for so many services, services in which Recreation Therapy practitioners are more than adequately prepared to lead, a specific staff to resident ratio should be endorsed in order to ensure the design and delivery of appropriate services for all residents.

**42. 2. b. ii** TRO recommends the designated lead have more than one year experience in a health care setting. Three to five years of experience with adults and older adults in a health care setting would lend itself to more appropriate preparation.

## 43. Recreational and Social Activities program. Section 10(1) of the Act

43.1 TRO strongly suggests the term "Recreational" be changed to 'Recreation'.

43.2 TRO strongly suggests that in addition to items a-e listed in this section, that professional Standards of Practice are also named and referred to in this section of the regulations. (See appendix A, TRO Standards of Practice).

The TRO Standards of Practice would lend further guidance and clearer expectations in service delivery for both the residents served and the staff persons delivering the service.

TRO also recommends minor wording changes and reordering of the points a-e. See below highlighted areas.

- (e) the provision of supplies and appropriate equipment for the program without charge to the residents;
- (c) the development, implementation and communication to all residents and families of a schedule of recreation and activity programs that are offered during days, evenings and weekends;
- (a) The development, implementation and evaluation of a wide range of recreation programs and services to address physical, social, emotional, spiritual and cognitive needs of all residents in the home that are offered in frequency, quality and quantity in order to benefit all residents of the home;
- (d) opportunities for resident and family input into the development and scheduling of recreation programs and activities; and
- (b) assistance and support to permit residents to participate in activities that may be of interest to them if they are not able to do so independently.

#### **44.2. Designated lead Recreational and social activities program**

- TRO strongly recommends the term "recreational" be changed to "recreation".

TRO commends the MHLTC on recognizing the need for a lead in this capacity, as well as defining the educational requirements of the lead. However, TRO respectfully suggests that this lead be someone who is trained specifically in the field of Recreation and Leisure, or Therapeutic Recreation (from an accredited college or university) **excluding all other relating fields** (as per the definition listed in the regulation, **UNLESS** the individual is able to meet the CIHI coding requirements definition (effective March 2009). TRO believes it is imperative that the lead of Recreation and social activities programs has a full command of the scope of practice of recreation (therapy) and is competent through his/her education and experience.

**44.3** TRO strongly recommends that if the individual presently acting in this capacity does not meet these requirements that they will comply within three years of the law coming into force.

#### **45.1 a&b Recreational and social activities qualifications**

- TRO strongly recommends the term "recreational" be changed to "recreation".

TRO wishes to commend the MHLTC on recognizing the need to identify specific staffing qualifications for all recreation service providers in the homes. Previous legislation and standards applied only to the manager of recreation, not to all of the recreation staff. It is imperative that all recreation service providers in the homes be educated in philosophies of recreation, leisure, play and therapeutic recreation in order to be well situated to meet the needs of ALL residents.

TRO respectfully suggests the ministry embrace and adopt the current (March 2009) **CIHI definition of eligibility to code Recreation Therapy** (as quoted here)

Code section P1bf for recreation therapy services that are provided or directly supervised by a qualified therapist who holds a:

- University degree or a college diploma in Recreation Therapy or Therapeutic Recreation, OR
- University degree or a college diploma in Recreation with a minimum of 3 Therapeutic Recreation courses, OR
- University degree or a college diploma in a related therapeutic / allied health discipline (e.g. music therapy, kinesiology, art therapy, horticultural therapy), with a minimum of 3 university or college Therapeutic Recreation courses.

The rationale behind this definition supports the need for education in Recreation Therapy and leisure concepts.

TRO respectfully suggests that "other educational" preparations listed are more specifically defined in addition to requiring course work in leisure, play, recreation as well as coursework in Therapeutic Recreation. Stating specific educational requirements will provide greater quality assurance to the recreation services provided in each of the provinces' Long Term Care Homes.

**45.2** TRO acknowledges the ministry's support of recreation professionals in training, and wish to again, respectfully suggest the education and training in this regulation also reflect the education preparations listed in the above paragraph (45.11).

**45.3** TRO strongly urges the ministry to reconsider this regulation in an effort to address the issues of long standing recreation staff without formal recreation education and training. TRO recognizes that many long standing professionals have learned on the job, as in other areas of the regulations (Regulations 56.3 Food Services Worker; 39.3 Therapy services staff), the ministry has set a minimum training requirement for new hires and for existing employees.

- TRO recommends that a minimum education standard be set in place for Recreation and social activities qualifications. The minimum standard should be three courses in the area of recreation, leisure or play, and five courses in therapeutic recreation as per the R/TRO educational requirements (effective Oct 2009) found at [http://www.trontario.org/uploads/RTROportfolioApplicationPkg\\_Oct2\\_09.pdf](http://www.trontario.org/uploads/RTROportfolioApplicationPkg_Oct2_09.pdf) within three years of the legislation taking force.

## **62. Religious and spiritual practices**

TRO believes the lead for Recreation and Social activities programs can also lead religious and spiritual practices. Services to provide care for this area of the residents' needs can be planned, implemented and evaluated in conjunction with the interprofessional practices within the home, as led by the leader of the recreation and social activities services area. Staff time allocation should also be incorporated into a formula for lead time of this and other program areas of service.

## **69. Volunteer Program**

TRO believes the lead for Recreation and social activities programs can lead the volunteer program in the home. Educational preparations of a TR professional include volunteer recruitment, retention, orientation, supervision and recognition.

Volunteers are a crucial component of the quality services being provided in the home, and they deserve and require an appropriate program within their home. Therefore as other programs and services require a specified lead, volunteer programs should be considered for specific time allocation in the formula for lead time (as with Recreation, Therapy, Social Services work, Religious and spiritual services). This lead should have formal course work in volunteer services.

## **119. Orientation of Volunteers**

TRO endorses this regulation regarding volunteer orientation.

**119. 3.** Once the Act is in force, TRO encourages the Ministry to include existing volunteers in the orientation program, not only new volunteers, as stated. Existing volunteers would also benefit from a review of the volunteer program and services. This regulation should also include a clause regarding on-going orientation and support of volunteers throughout their service to the residents of the home (e.g. new protocols, new residents, etc.).

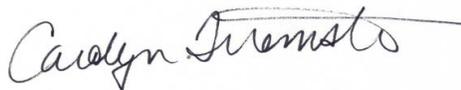
**137. Criminal Reference Checks**

Although the CRC may at times impede the volunteer application process, TRO strongly endorses the need for CRC's for individuals in contact with residents living in long-term care. In addition, TRO supports the staff CRC requirements.

In closing, , on behalf of TRO, I would again like to thank you and your ministry for the opportunity to provide written comments to the MHLTC regarding **Part 2 of the Proposed Initial Draft Regulation**. The revised act will ensure a level of quality care unsurpassed within long-term care practices. As outlined in the *Vision of Quality in Ontario Long-Term Care Homes*, sponsored by the Ministry of Health and Long-Term Care (MOHLTC) and the Seniors Health Research Transfer Network (SHRTN) in 2008, we must all work together to improve direct care by increasing human resources capacity through recruitment, retention and improvement strategies; create a stronger pool of qualified staff through educational preparation; build on existing front-line staff capacity; provide necessary equipment and technology to achieve success; and build stronger leadership capacity in the LTC home sector.

We look forward to reviewing the additional updates to the regulations for the act. Please do not hesitate to contact me in the future should you require clarification on any of our positions.

Sincerely,



Carolyn Triemstra, R/TRO  
TRO President