



April 8, 2024

Ministry of Health
Ontario Health Team Policy and Operation Branch,
Strategic Partnerships Division
438 University Avenue
Toronto ON
M7A 2A5

RE: Proposed new regulation under the Connecting Care Act, 2019
Proposal number: 24-HLTC007

The following are our comments regarding the *Proposed New Regulation under the Connecting Care Act: OHT Designation*. We are cognizant that this regulation is raising many questions amongst OHT members regarding its implementation and that this will certainly lead to many changes in the regulation. Nonetheless, the suggestions provided in this document are reflective of the regulation in its current format and take into consideration the overall need to be more prescriptive as it relates to French language services (FLS). The three main areas of focus are: equity, designation under the FLS Act and FLS planning.

1. Equity

Equity is mentioned twice in the proposed regulation: the acknowledgement that Health Equity must be in the OHT purpose statement (2.1.ii); and the need for the by-laws to include a minimum set of competencies related to equity, diversity and inclusion (2.1.iii.G). While one could assume that the context of FLS is included when speaking about Equity, diversity and inclusion, we would argue that it is not always the case. It is important to name FLS as a requirement in order to ensure that they are planned and offered. For this reason, it is recommended that FLS be directly mentioned as a requirement in the regulation to ensure that concrete action be taken to address the need to actively offer FLS as per the *French Language Services Act* and its regulation on Active Offer. Specific examples of how FLS can be named in the regulation are included in the next section.

2. Designation under the FLS Act

It is essential that all OHTs covering a region designated under the FLS Act be identified for designation under the FLS Act. This is a process that is done through



recommendations from the French Language Health Planning Entities to Ontario Health and subsequently to the Ministry of Health and the Ministry of Francophone Affairs.

As the roles and responsibilities of OHTs evolve, accountability measures need to be established to ensure the provision of FLS at all levels of the organization and with partner members. The designation of an OHT under the FLS Act would provide for a standardized approach in the provision of FLS, especially as it relates to:

- coordination of patient navigation, appointment scheduling and service coordination;
- implementation of all programs and services as it relates to existing and new funding;
- accountability provisions in all funding agreements for the delivery of home care services with primary care service providers for the provision of French-language services under the *French Language Services Act*, for both non-profit organizations and private companies;

Further clarification would need to be added to the following:

- Board of directors – Competency as an experienced-based board must also include members with competency in FLS (2.1.iii).
- By-laws should indicate that an FLS committee is required with the chair of this committee as a board member (2.1.v).
- By-laws related to Patient, Family and Caregiver (PFAC) involvement, must include the need for at least one Francophone PFAC; more in areas of high Francophone density (2.1.ix).
- Planning tables must include the participation of the French Language Health Planning Entities (2.1.x).

3. FLS Planning

In addition to the other elements of the plan that needs to be submitted by the OHT to the Minister, it is recommended that OHTs that are identified for designation under the FLS Act, provide a readiness and delivery plan indicating how they will plan for and provide FLS. The plan should include the six actions that are part of the *Winning*

Réseau du mieux-être francophone du Nord de l'Ontario

234, rue Van Norman St., Thunder Bay ON P7A 4B8

Tel : 866-489-7484

www.reseaudumieuxetre.ca



Strategies for Serving Francophone Clients initiative developed by the Réseau des services de santé en français de l'Est and adapted by the Réseau du mieux-être francophone du Nord de l'Ontario. This strategy has been adopted and implemented by 14 OHTs. The actions of the *Winning Strategies* include:

1. Identify one or more champions
2. Complete active offer training (www.activeoffer.ca)
3. Identify staff members able to provide services in French
4. Identify Francophone clients
5. Match Francophone clients with staff members able to provide services in French, or refer Francophones patients/clients to another provider offering equivalent services of equal quality in French, or ensure the provision of interpretation services
6. Measure results, as per indicators attached to each action

These strategies are supported by key indicators that would allow OHTs and partner organizations to measure their progress towards the delivery of FLS.

Anticipated Benefits for Including Proposed FLS Elements

The inclusion of these elements in the proposed regulation would:

- Ensure that the needs of Francophones are being addressed in the planning and implementation of services within the OHT.
- Ensure a standardized approach to the implementation and delivery of FLS.
- Ensure that OHT activities and initiatives are supported to enhance the active offer of FLS.
- Ensure the provision of board accountability for funding decisions that impact organizations and OHTs as it relates to the active offer of FLS.
- Ensure the reduction in costs since the inclusion of the Francophone lens is part of the initial planning process.
- Ensure client satisfaction.
- Ensure the provision for a standardized approach in measuring progress towards the delivery of FLS.