

## **AFHTO INPUT ON PROPOSED NEW REGULATION UNDER THE CONNECTING CARE ACT, 2019**

The Association of Family Health Teams of Ontario (AFHTO) would like to thank the Ministry of Health for inviting our members to provide feedback on a new proposed regulation under the Connecting Care Act, 2019 (CCA) that would outline requirements that Ontario Health Teams (OHTs) would be required to meet to be eligible for potential designation ([Proposal Number:24-HLTC007](#)).

### **Feedback Process**

AFHTO surveyed member organizations, offering the opportunity to provide a summary of their feedback as it relates to the proposed regulation. The remainder of this document discusses the survey results and related sentiment around the proposal.

### **Overall Concerns**

1. **Primary Care Network (PCN) Representation:** AFHTO members are concerned with the “one size fits all” approach to PCN representation on the OHT board that is being proposed in the regulation. The number of PCN appointed seats on the Not-For-Profit (NFP) Co-ordinating Corporation’s board of directors should reflect the network size or funding amount rather than only allocating one seat per board. OHTs were originally intended to meet the needs of the populations they serve, populations which differ across the province. PCN representation on OHT boards should be mandatory but flexible so that multiple PCN representatives sit on the board for OHTs that have particularly large PCNs. In areas with a particularly large PCN, a PCN-appointed seat could be given to both a physician and nurse practitioner who are engaged with the local PCN, for example, to better-reflect the diversity of clinicians within a PCN.
2. **Patient, Family and Caregiver (PFAC) Representation:** AFHTO is concerned with the “one size fits all” approach to PFAC representation on the OHT board as well. Consideration should be given to the PFAC seat requirement to ensure people with diverse experiences within the health care system are represented in decision-making.
3. **Role of the Coordinating Corporation:** The proposed regulation should clarify the specific role of the Coordinating Corporation and whether it will provide direct services in addition to coordinating services. Early Ministry of Health guidance when the Connecting Care Act, 2019 was first introduced was that all funding for services will eventually flow through OHTs, and that OHTs will engage in direct service provision. The Ministry of Health should provide clarity on whether the Coordinating Corporation is itself providing direct services, or if it is merely coordinating service provision among other providers.

4. **Constituent Membership Across Multiple OHTs:** The proposed regulation should further clarify whether individual health care providers can be constituent members of multiple OHTs. Since 2019, a concern of community-based health care providers generally, and community-based primary care teams specifically, has been involvement in multiple OHTs which has led to high administrative burden, costs, and potential or perceived conflicts of interest. While health care providers have appreciated the ministry's flexibility in self-organizing into OHTs, member organizations have waited patiently for guidance from the Ministry of Health on how to deal with issues associated with being involved in multiple OHTs. AFHTO recommends clarifying constituent membership across multiple OHTs in the regulation, and considering how being a constituent member of multiple OHTs will lead to enhanced administrative burden, costs, and potential or perceived conflicts of interest as OHTs continue to mature.

**Additional Considerations from Members:**

- Establishing a PCN and participating on an OHT board to represent that PCN, is a significant amount of work. Physicians who will be providing time from an administrative perspective to develop, implement and monitor the PCN need to be compensated.
- Additional resources need to be provided to Northern communities to be able to work on these mandatory requirements - organizations are smaller, are stretched thin, and have the same expectations as larger organizations who have more staff who can contribute to working on these initiatives.
- Indigenous partners need to be consulted on this proposal to discern whether they have concerns about the proposed OHT governance structure.
- The Ministry of Health should continue to consider how the current pay gap between community-based health care and other sectors negatively impacts OHT implementation and the ability of providers to comply with this proposed regulation.

AFHTO would like to thank the Ministry of Health once again for the opportunity to provide feedback on this proposed regulation.



**Leslie Sorensen, CEO**

**April 8, 2024**