

## Letter on Proposed Bill 11- *More Convenient Care Act, 2025*

May 30, 2025

The Honourable Sylvia Jones  
Minister of Health  
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Delivered via email Sylvia.Jones@ontario.ca

Dear Minister Jones,

As the only provincial association that represents the full spectrum of the seniors' care continuum, I am writing this letter to share feedback on the proposed Bill 11, *More Convenient Care Act, 2025*. We understand that this bill, if passed, would introduce a new act—*Health Care Staffing Agency Reporting Act, 2025*—relating to disclosure of costing and information from health care facility staffing agencies (or “temporary help agencies”) in the long-term care, hospital and community health sectors.

We applaud the Ministry for recognizing this need for increased transparency of temporary help agencies operating in the healthcare sector. Following the creation of the new licensing framework for temporary help agencies and recruiters through the *Working for Workers Act, 2021*, this is a vital and appreciated next step in creating a comprehensive regulatory framework for these agencies.

The introduction of this new legislation is of particular significance to our membership, which comprises close to 500 members including not-for-profit, charitable, municipal and hospital-led long-term care homes, seniors' housing, supportive housing and community service agencies. As such, our commentary in this letter will focus on this proposed legislation.

The long-term care sector is still recovering from the pandemic, including the loss of staff from the sector. Many homes have not recouped their staffing to pre-pandemic levels, which has fueled the continued growth and usage of temporary help agencies. While agencies have always had a key role in the health system in providing temporary relief for staffing coverage and shortages, they should not be a permanent element of an organization's workforce. However, many long-term care homes are relying on significant numbers of agency staff to fill positions and manage chronic staffing shortages, even over and above pre-pandemic levels. This increased use of agency staff often comes at a higher cost and lower quality of care, given we know that continuity of care with the same healthcare provider leads to better outcomes. In fact, some

agencies are charging exorbitant prices well beyond the prevailing rates homes pay their own staff.

To date, the Association has put forward several submissions and recommendations to government on enhancing transparency and regulation of temporary help agencies for both the protection of seniors and the sustainability of funding and health human resources for the seniors' care sector in Ontario.

#### Commentary: Health Care Staffing Agency Reporting Act, 2025

We understand that this proposed Act would require temporary help agencies that assign people to perform work for a health care facility to submit regular reports (at least every six months) to you, the Minister of Health. The report must include the information set out in regulation relating to aggregate administrative, billing or pay rate information for the health care facility which an agency provides staff to work at. Notably, you would have the authority to publish any prescribed information from the reports.

We are very supportive of the introduction of this legislation and welcome this increased transparency in staffing agencies' administrative, billing, and pay rate information to the government. We have long advocated for increased transparency of agency rates.

While we are supportive of this proposed legislation, we have concern relating to the possible publishing of information regarding individual long-term care homes' use of agencies. Careful consideration should be given to if and how this information is publicly reported.

Given the health human resources landscape in the sector and the fact that, especially in rural and northern communities, the market for healthcare professionals is and has always been limited, some homes will always show a higher than average use of staffing agencies. The focus should not be on long-term care homes, or any healthcare organization, as there might be reputational risks to manage in this context if a long-term care home's costs and contracts relating to temporary staff members are made publicly available. Rather, the issue is transparency around justification for the high rates some agencies choose to charge. Long-term care homes, and presumably other healthcare organizations alike, would benefit from knowing the costs of agency staff throughout the sector. Therefore, we strongly recommend that any information made publicly available be at the agency level and not connected to specific healthcare organizations. Additionally, this bill requires agencies to report how much of their rates are used to cover staff wages and benefits versus profits. Should the Ministry decide to make this information public, we also recommend that the prevailing union rates, by region, also be made publicly available so that agency rates can be compared to a benchmark. Lastly, given the significance of this bill on our members, once passed, we would greatly appreciate the opportunity to be consulted on the regulations.

We appreciate this opportunity to provide feedback on the proposed legislation—*Health Care Staffing Agency Reporting Act, 2025*—and once again strongly support the Ministry in their efforts in creating a regulatory framework for staffing agencies in the healthcare sector. We are

hopeful that this transparency will cause some agencies to reconsider exorbitant pricing and bring costs more in line with prevailing union rates in the sector.

Sincerely,



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