



February 7, 2018

The Honourable Charles Sousa
Minister of Finance
7th Floor, Frost Building South
7 Queen's Park Crescent
Toronto, Ontario M7A 1Y7

Please find attached CARP's submission regarding the 2018 Ontario Budget. This submission focuses around three major priorities:

1. Prevention of abuse in long-term care;
2. Improved investor protection;
3. Increased vaccine coverage.

We wish to express support for three initiatives as well.

Yours sincerely,

A handwritten signature in blue ink that reads "Wanda Morris".

Wanda Morris
VP of Advocacy

A handwritten signature in black ink that reads "Marissa Semkiw".

Marissa Semkiw
Director of Policy and Government Relations



Summary

CARP is a national seniors advocacy organization with 300,000 members across the country and 120,000 in Ontario.

This submission focuses around three major priorities:

1. Prevention of abuse in long-term care;
2. Improved investor protection;
3. Increased vaccine coverage.

We wish to express support for three initiatives as well.

Long-Term Care

Violence and abuse in long-term care has jumped 150 percent in just six yearsⁱ. Reports of resident-on-resident violence have increased to 9 reports a day province wide, up from four per day in 2006, despite a fairly small increase in the number of residentsⁱⁱ. There are too few staff, and many of them are inadequately trained to deal with the increasingly complex needs of long-term care residents.

At a minimum, CARP calls on the government to:

1. Implement mandatory staffing levels in long-term care facilities to reflect the changing composition of residents and better protect the frailest of the frail population;
2. Fund behavioural support training for staff dealing with residents with dementia;
3. Invest in technology to provide better and more effective care.

Mandatory Minimum Staffing Levels

The composition of long-term care has changed, and yet our model in terms of staffing levels has not. The number of residents with high to very high care needs has increased. The vast majority (90%) of long-term care residents have cognitive impairment, with one-third severely impairedⁱⁱⁱ. CARP strongly supports regulation that provides specified staffing levels (for both medical and support staff) in long-term care. CARP further calls on the government to engage in a round of consultations with key stakeholders, to be concluded within no more than one year, to determine what the appropriate staffing levels should be to ensure maximum safety for residents.

CARP members strongly support mandatory minimum staffing levels. In a recent survey, 95% of respondents agreed or strongly agreed that the number of medical personnel present should be regulated based on the number of residents in a long-term care facility^{iv}.

Fund Behavioural Support Training

Often when residents act out, it is due to an unmet need that they are trying to address. While behavioural support training is critical for care workers, there are



no mandatory training requirements for staff in long-term care in Ontario. The increase in rates of resident-on-resident violence highlight the urgent need for staff to undergo behavioural support training, so they are better equipped to serve residents.

Investment in Technology

In order to better support individuals living safely and autonomously in long-term care, CARP calls on the government to invest in new and advanced technological innovations, such as GPS locator devices for people with dementia, and smart insoles that predict when seniors are at risk of falling. CARP believes there is a strong need to fund the kinds of technology that will support our aging population.

Investor Protection

Ontarians pay some of the highest fees with the least protections of people in any OECD country. This has to change.

When older Ontarians lose money, too often they have to draw on public supports. A far better alternative is for older Ontarians to keep, save and protect their own money. This is a matter of fairness and prevention.

Our polls show investor protection is extremely important to CARP members. Seniors hold a disproportionate amount of the invested wealth in Canada, so while this isn't strictly a seniors' issue, our members are heavily impacted. Moreover, ineffective financial protection is particularly harmful to older investors, who may lack the cognitive capacity to protect themselves and are unable to make up the losses they suffer from conflicted advice. As such, CARP calls on the government to heed the following recommendations, which will better protect individuals.

At a minimum, we believe the government should:

1. Introduce a best interest standard to eliminates compensation-related conflicts of interest;
2. Eliminate embedded fees, including but not limited to trailer fees;
3. Regulate titles to better reflect expertise, and alert seniors when they are dealing with commission-paid salespeople.

Best Interest Standard

CARP applauds the government for having publicly supporting a best interest standard, and encourages the government to take immediate steps to implement it. A best interest standard will require financial advisors to put the financial returns of their clients ahead of their own compensation. Countries from the United States to Australia have embraced this idea. It's time Canada does too.

Eliminate Embedded Commissions

Canadians pay among the highest mutual fund fees in the world. What's worse, many investors are unaware of the fees they pay on their investments. Embedded fees, including trailing commissions, must be eliminated to ensure investors are



empowered to act with full information. Recent disclosure rules are helpful, but because they only deal with the cost of advice – and not the cost of products – they only present a partial picture.

Regulate Titles

CARP believes you shouldn't be able to put a title on your business card just because it sounds good. Titles used in the financial services industry are unregulated. As a result, there is a confusing array of titles and often no relationship between the title and the proficiency of the individual using it. This leaves investors ill prepared to ask questions and to make fully informed decisions. CARP calls on the government to develop a tight and informative list of approved titles with related proficiencies. Where individuals do not have approved financial planning credentials, CARP strongly recommends their titles include the word salesperson.

Adult Vaccinations

Older adults are not adequately vaccinated for key illnesses like shingles and influenza. This may result in significant negative health outcomes.

With mileage, our immune systems evolve and our body's ability to fight off infections deteriorates. Whether shingles, pneumonia or influenza, this decline of the immune system, coupled with often underlying conditions, increases the risk of an inflammatory cascade, resulting in severe complications, including fatalities.

Health Canada's own flu vaccination goal (80% of high-risk populations) has not been met; a recent report found only 65% of Canadians aged 65 and older were protected^v. We encourage the government to do better.

CARP calls on the government to fully fund adult vaccinations, including Shingrix, a new shingles vaccine, and Fluzone, a high-dose influenza vaccine. CARP also calls on the government to fund programs that increase awareness of the importance of vaccinations, and promote coverage without barriers.

Fluzone

CARP applauds the Ontario government for committing \$17 million per year to provide a free high-dose influenza vaccine to seniors. While this is laudable, Canada's aging population is projected to nearly double in the next 20 years from 5.7 million in 2015 to 9.9 million in 2036. CARP calls on the government to ensure that as the aging population grows, their commitment remains in step with the demand, so that no senior is ever denied protection.

Finally, CARP is pleased to provide its support for the following reports and calls on the government to fully implement and fund their recommendations:

1. The Law Commission of Ontario Report on Legal Capacity, Decision-making and Guardianship which recommends a plan to reform Ontario's laws and policies



regarding powers of attorney, guardianship and health care consent;

2. FAIR Canada and the Canadian Centre for Elder Law's joint report on Vulnerable Investors: Elder Abuse, Financial Exploitation, Undue Influence and Diminished Mental Capacity;

3. Ontario's Action Plan for Seniors.

These are CARP's submissions. Thank you for your kind consideration.

ⁱ Violence and abuse in long term care homes. CBC, 2018.

<http://www.cbc.ca/news/thenational/violence-and-abuse-in-long-term-care-homes-1.4504831>

ⁱⁱ Mancini, Melissa; Pedersen, Katie. 'It's a horror movie': Nursing home security footage provides raw picture of resident violence problem. CBC, 2018. <http://www.cbc.ca/news/health/long-term-care-marketplace-1.4501795>

ⁱⁱⁱ This is Long-Term Care 2016. Toronto: Ontario Long-Term Care Association, 2016.

<https://www.oltca.com/OLTCA/Documents/Reports/TILTC2016.pdf>

^{iv} Long-Term Care Needs to Change with the Times. Toronto: CARP, 2018.

<http://www.carp.ca/2018/01/26/long-term-care-needs-change-times/>

^v Public Health Agency of Canada. "Influenza Vaccine Uptake: Results from the 2015/16 National Influenza Immunization Coverage Survey in Canada." Canada.ca, 6 Apr. 2017.