



# OANHSS

**ONTARIO ASSOCIATION OF NON-PROFIT HOMES AND SERVICES FOR SENIORS**

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Accessibility Directorate of Ontario  
Outreach and Compliance Branch  
Ministry of Community and Social Services  
777 Bay Street, Suite 601  
Toronto, Ontario  
M7A 2J4  
publicreview@ontario.ca

Dear Sir or Madam:

**RE: OANHSS Comments on Proposed Accessible Built Environment Standard**

The Ontario Association of Non-Profit Homes and Services for Seniors (OANHSS) applauds the efforts of the government of Ontario, and the Standards Development Committee, to address the barriers that exist to full accessibility for all Ontarians and to create an accessible Ontario by 2025.

We have chosen to submit general comments on the proposed standard, as articulated below.

## *Introduction*

OANHSS is the provincial association that represents not-for-profit providers of long term care, services and housing for seniors. Our members, which include operators of municipal and charitable long term care homes, non-profit nursing homes, seniors' housing projects (including life lease, not-for-profit seniors' housing, and supportive housing) and community service agencies, operate over 27,000 long term care beds and over 5,000 seniors' housing units. Members of OANHSS are acutely aware of the difficulties and barriers that are faced by seniors and others who live with physical, auditory and visual disabilities.

Member organizations have devoted a great deal of effort and study to make the environments for which they are responsible as accessible as possible. Over the past decade, thousands of long term care beds have been either added to the sector or redeveloped, and all are considered to be barrier free under the Ministry of Health and Long-Term Care's (MOHLTC's) Long-Term Care Home Design Manual (1999).

In the seniors' housing sector, development is underway with Ontario's capital funding program for affordable housing. This initiative includes a combined federal and provincial economic stimulus fund of over \$1 billion which is intended for affordable housing construction and renovation and retrofit of existing housing. Design work is already underway as all construction must be started no later than June 30, 2011, and all funds committed by March 31, 2011.

### *New Construction*

OANHSS is supportive of an appropriate accessibility standard for new construction in the long term care and seniors' housing sectors. We recognize that funding responsibilities for new long term care homes, and seniors' housing are most often shared between providers and government, and we urge the government to recognize the added costs of meeting a higher standard.

We have not conducted a detailed, technical analysis of the proposed new standard as it relates to long term care; however, we understand that such an analysis is currently being conducted by the MOHLTC. The province is currently engaged in a major expansion program to redevelop 35,000 "B" and "C" category long term care beds over the next ten year period. Our immediate concern is whether the proposed standards will impact homes already applying in the first wave of redevelopment under this program.

With regard to the seniors' housing sector, implementing a new standard in the midst of such an expansion project that is currently underway will result in unanticipated costs that operators may be unable to meet and delays that could jeopardize the funding.

### *Existing Buildings*

With respect to existing long term care homes, approximately 36,000 beds (20,000 new beds and 16,000 redeveloped beds) have been built or rebuilt in the past three to five years, and all are considered to be accessible (barrier free) under the MOHLTC's Long-Term Care Home Design Manual (1999). Additional costs that would be incurred for

these beds to become compliant with the proposed new standard within the proposed five years would need to be covered by government and, given the high standards already followed, the actual value of the benefits of such retrofits could be greatly exceeded by the costs.

As previously noted the province is currently engaged in a major expansion program to redevelop 35,000 “B” and “C” category long term care beds over the next ten year period. These beds are being designed to the standards articulated in the Long-Term Care Home Design Manual (2009), and will become barrier free over the next ten years. Requiring these homes to meet the proposed new standard within five years will cause hardship and compress a timeline that has recently been established and planned for.

In addition to capital costs, there will be associated costs for training and technical support for building assessments which could further burden the long term care sector and the seniors’ housing sector (with respect to the projects currently planned or underway).

We are pleased, however, to hear that the Minister has affirmed that it is not the intention of the government to require retrofit of existing seniors’ housing at this time, and note that a proportion of seniors’ housing units are already considered to be accessible. There does appear to be uncertainty around exactly what the retrofit requirement will eventually be, and we anticipate that our sector will be invited to comment should the government decide to require that existing seniors’ housing comply to the new standard in the future.

## *Recommendations*

In principle, OANHSS and our members support an appropriate standard that will improve accessibility for Ontarians.

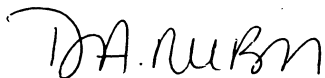
Our comments reflect our primary concerns around potential requirements for retrofitting existing long term care beds and the costs of new construction for both long term care homes and seniors’ housing should the proposed new standard become law. We recommend that any requirements for retrofitting in the not-for-profit long term care and housing sectors be made only to achieve significant added value, that due consideration be given to the level of accessibility already in place and to the cost of compliance with a new standard.

We urge the Ministries involved in both long term care and seniors' housing to align on standards and ensure that neither sector experiences undue financial burden to achieve the final standard. Additional costs that would be incurred by existing long term care homes to become compliant with the proposed new standard within five years would need to be covered by government and, the actual value of the benefits of such retrofits could be greatly exceeded by the costs given the high level of accessibility already in place.

Costs and time delays resulting from implementation of a new standard for new construction in the not-for-profit seniors' housing sector could jeopardize the success of the projects already underway or planned, and we recommend that the government give this situation due consideration. It is essential to provide sufficient lead time before implementation to allow builders to plan accordingly and to develop a plan to address the likelihood that housing currently being developed under the federal provincial affordable housing program may not meet the new standard and will be subject to retrofit at some time in the future.

Thank you for the opportunity to comment on the draft standard; we appreciate having the chance to do so. We look forward to further progress in the area of accessibility, and commend the government for the work undertaken thus far.

Sincerely,



Donna A. Rubin  
Chief Executive Officer