

October 6, 2020

The Honourable Dr. Merrilee Fullerton
Minister of Long-Term Care
438 University Avenue, 6th floor
Toronto, Ontario
M7A 1N3

Dear Minister Fullerton,

We acknowledge your passion for the care of seniors in our Province. As a group of concerned and committed Registered Dietitians, we recognize government's continued efforts to support seniors' services throughout the pandemic. We are grateful to live in Ontario and thankful for the safety measures put in place to date.

As we enter the second wave of Covid-19, we are writing to alert you to the current situation in Long-Term Care related to the nutrition and hydration needs of all residents. The **Canadian Armed Forces Report, *Observations in Long Term Care Facilities in Ontario (Army Report)*, identified three primary concerns during the first wave of the pandemic related to nutrition and hydration:**

1. Identification of high-risk residents was overlooked putting them at further risk of malnutrition, dehydration, choking, and further debilitation;
2. Some residents did not receive adequate food and fluid due to a crisis of staff shortages, infection, and isolation resulting in unintentional weight loss, malnutrition, dehydration, choking, and other risks up to and including death; and
3. There was a lack of Dietary Management Support onsite 7 days per week.

Like you, we were alarmed and heartbroken that residents in Long-Term Care went without adequate nutrition and hydration and want to propose solutions.

At the onset of the pandemic, Registered Dietitians were deemed essential services. However, they have been restricted from being onsite in some cases and restricted from working in multiple sites. The Long-Term Care Homes Act, 2007 O. Reg. 79/10 outlines that Registered Dietitians are to be onsite 30 minutes per resident per month. The majority of Registered Dietitians work in multiple homes and have been operating since the onset of the pandemic in one of four ways:

Dietitians of Canada / Les diététistes du Canada

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1. **Remote** - Virtual access only;
2. **Hybrid** - Virtual access and entering the home only if the resident is in a crisis (e.g. In need of a swallowing assessment with proper clearance and PPE);
3. **Onsite** - One location only with proper clearance and PPE; and
4. **No Coverage** – No remote access as some rural homes only allow onsite services.

Although Registered Dietitians are deemed as essential services, the restrictions in most homes from being onsite during the first wave of the pandemic proved very challenging. Registered Dietitians were not able to be onsite to proactively monitor residents at high nutrition risk including those residents at risk of dysphagia. Working remotely also put additional burden on the system as the Registered Dietitian had to contact Nursing/Clinical staff for resident information. Registered Dietitians were not easily accessible onsite to support the medical staff, health care staff, dietary staff, and the home's infection prevention control and support systems.

Another challenge was not having Dietary Management Support on site 7 days a week. All homes need to have a Designated Nutrition Lead, a Nutrition Manager or Registered Dietitian, to fill the Dietary Management Support role and be responsible for the provision of food and fluids 7 days a week. The Registered Dietitian in the Nutrition Manager's absence can cover the Dietary Management Support role. The need for consistent supervision was clearly identified in the *Army Report* and the pandemic debriefs.

As we enter the second wave of the pandemic, restrictions limiting Registered Dietitians' onsite access in Long-Term Care needs immediate attention. To act on the *Army Report* we recommend:

1. A Registered Dietitian be onsite at all Long-Term Care Homes in Ontario;
2. Allow Registered Dietitians access to multiple sites with the correct precautions and PPE;
3. Virtual Registered Dietitian services available as a minimum if home is remotely located;
4. A Designated Nutrition Lead (Dietary Management Support) on site 7 days a week; and
5. Increase Registered Dietitian hours to 1 hour per resident per month during the pandemic.

These recommendations will help ensure that residents in Long-Term Care will be adequately nourished, hydrated, safely fed, and monitored for nutrition risk.

Registered Dietitians are a viable and readily available workforce able to be onsite to monitor for nutrition risk, assist with Dietary Management Support, and help alleviate the pressure on the health care team overall. We look forward to your reply and urge you to include Registered Dietitians in your planning and debriefing opportunities related to preventing the tragedy that occurred in Long-Term Care during the first wave of the pandemic. Thank you again for your continued efforts to support seniors' services throughout these challenging and unprecedented times.

Sincerely,

The image shows two handwritten signatures in blue ink. The first signature is 'Stacey Scaman' followed by a small circular logo containing a stylized 'D'. The second signature is 'Alicia Marshall'.

Stacey Scaman, RD and Alicia Marshall, RD
Co-Chairs, Ontario Long Term Care Action Group

The image shows a handwritten signature in blue ink that reads 'Lisa McKellar'.

Lisa McKellar, MA, RD
National Lead, Policy &
Government Relations

cc. The Honourable Doug Ford, Premier of Ontario
The Honourable Christine Elliott, Deputy Premier and Minister of Health