

Consultation Paper on the Second Extension of the Needle Safety Regulation to Additional Workplaces and Health Care Services

The Ontario Home Care Association (OHCA) is pleased to provide input to the Ministry of Labour (MOL) and the Ministry of Health and Long-Term Care (MOHLTC) on its regulatory development process for the introduction of safety engineered needles (SEN) in home and community care settings.

OHCA Key Recommendations:

- Given the growing importance of the home care sector and in order to protect home care staff and clients, the OHCA believes that CCACs must be funded appropriately to provide safety engineered needles where the use of this new technology is proven to be appropriate, effective and efficient.
- As there are different types of safety engineered needles, the OHCA believes that there should be consistency in standards and purchasing methods across CCACs so that education and safety training by the service provider organizations can be effective and efficient within the province.
- Recognizing the challenge for busy clinicians to adopt new techniques, OHCA recommends that training and education sessions be established for all home care providers in the province.
- A public awareness campaign with standardized training and educational materials on the use of safety engineered needles should be developed for non-government funders of health care services and supplies, and recipients of care and their family caregivers.
- Non-government funders of home care services should be required to supply without penalty to recipients of service, safety engineered needles so that the burden of enforcement does not rest with the frontline clinician.

Discussion

Patient and provider safety is a significant health care priority in Ontario. In having initiated the legislative changes to support safety engineered needles, the government of Ontario has demonstrated that it recognizes that while costs of safety engineered devices exceed the cost of conventional devices, savings will be realized overall when the costs of sharps-related injuries are factored.

Acknowledging the uniqueness of home care, the OHCA has been invited to respond to the MOL and the MOHLTC consultation on the regulatory development process for the introduction of safety engineered needles (SEN) in home and community care settings.

Safety-engineered needles are needles with a built-in safety feature or mechanism which eliminates or minimizes the risk of a needle-stick injury. Examples include needles that retract into the syringe or vacuum tube holder, hinged or sliding shields attached to the needle, or blunt tip needles.

Home Care

Family and friends, not the formal home care system, provide the majority of continuous care and support to their loved one at home. Discrete home care services (e.g. nursing care, personal support, therapy) are delivered in defined amounts of time by staff in order to achieve specific goals, such as providing specific procedures or instruction regarding self-care. Unique to the home care system, family members and the general public can also be at increased risk due to improper disposal and/or handling of needles following use in the home and community care setting.

Needle stick injuries occur frequently in the home care setting and can affect all home care workers including nurses, therapists and personal support workers (PSWs). Noting the broad spectrum of use in the home and community care sector, the Ontario Safety Association for Community & Healthcare (OSACH) asserts that the incidences of injuries due to needle stick injuries are widely under-reported in the home and community sector.¹

As “guests” in the client’s home, staff must often work with the resources made available by the client. The need for excellence in home assessments and inter-agency communications, especially during a transition from hospital to home, is critical to ensuring the availability of approved safe equipment and supplies. From a systemic perspective, hospitals, CCACs and home care organizations must work together prior to care transitions, to ensure the availability of equipment and supplies in order to enable both the safety of staff and clients.

Injury Prevention

Preventing needle stick injury is not as simple as only passing a law. There needs to be a commitment to staff education and training; and integration with organizations’ occupational health and safety programs, specifically the needle safety programs, so that the whole workplace culture and chain of events that can lead to needle stick injury can be addressed. Organizations need to ensure that there is a good understanding of the regulation, build widespread awareness within their workforce, develop a safety plan, assess and select the safety-engineered products they think are best, provide ongoing education and training for health-care workers, and evaluate the product, process and outcomes of the new initiative.

To be most effective, OHCA believes that there needs to be collaboration amongst the home and community providers / stakeholders in order to effectively implement a comprehensive and consistent needle safety program within the home and community care sector in Ontario. The OSACH should serve as a resource to support not only the introduction of the new device but rather a refresh of organizations’ sharps injury prevention programs. This work must be conducted in addition to current initiatives and

¹ The home health care sector which may include visiting nursing services or other services in the home may be captured by WSIB in one of two different rate groups. Rate group 857 is basically nursing services. Rate group 861 is a rate group called treatment clinics and specialized services, and actually captures many different types of workers - CCAC, health units, daycares, community service agencies and some home making services.

funded accordingly. CCAC funded service should not and cannot be allowed to be compromised as a result of introducing improved safety measures.

Furthermore, as home care providers are often called upon to use equipment and supplies purchased by the client (directly or through insurance plans), a key component of the education of frontline staff must include strategies for engaging recipients of care to using the safer devices. Strategies to relieve individuals of their existing stock of sharps must be introduced. OHCA also recommends that all funders / purchasers of care, equipment and supplies in the home and community setting be engaged in a structured dialogue to ensure that the SENs are available to all recipients of care. The regulation must require funders to supply safety engineered needles in a cost neutral manner to clients. In other words, clients should not experience reduced coverage or benefit as a result of the introduction of improved safety measures. Frontline staff should not be placed in the untenable situation of having to use needles, or require that their clients use needles, deemed to be of greater risk.

OHCA commends the MOL and MOHLTC for its work to create a safer Ontario through safety engineered needles. Within home and community care, needle safety extends beyond the health care team and recipient of care to the broad community network including those in schools, in the workplace, family members at home and municipal workers responsible for waste management. The regulations must therefore address the various ways that individuals receive health supplies and service in their home and communities – through the publicly and privately funded channels.

The Ontario Home Care Association

The Ontario Home Care Association (OHCA) is a provincial association representing home health and social care service providers. Association members deliver nursing care, home support services, personal care, physiotherapy, occupational therapy, social work, dietetics, speech language therapy and medical equipment and supplies. Ontario Home Care Association members are contracted by all three levels of government, Community Care Access Centres, insurance companies, institutions, corporations and by private individuals. OHCA members are accredited through Accreditation Canada and/or the International Standards Association (ISO).

For more information,

Susan D. VanderBent, Executive Director

Phone: 905-543-9474

Fax: 905-545-1568

e-mail: suevan@homecareontario.ca