



RE: The Implementation of Complex Care Housing in BC

April 14, 2022

Gina Gardner
Director, Strategic Policy
Child, Youth and Mental Health Policy Division
Ministry of Mental Health and Addictions

Dear Gina,

We are writing as a group of health, housing, and homelessness-serving associations whose members will be impacted by and implicated in the actualization of complex care housing in BC. Our organizations welcomed Minister Malcolmson's announcement in February and the Province's commitment of \$164 million to support 500 people with complex needs in BC over the next three years. We look forward to partnering with the Ministry of Mental Health and Addictions (MMHA) in the implementation of these new initiatives and send this letter in anticipation of our upcoming meeting with the Ministry on April 19th to discuss the recently released *Complex Care Housing: Draft Strategic Framework*.

The following provides a summary of key concerns and recommendations put forward by the BC Non-Profit Housing Association, the Canadian Mental Health Association of BC, the Homelessness Services Association of BC, and PAN (formerly the Pacific AIDS Network). In our view, each of these recommendations are necessary for ensuring the success of this significant investment.

“Effective operationalization and implementation of Complex Care Housing will require cross-sectoral collaboration and partnership.” – *Complex Care Housing: Draft Strategic Framework* (Feb 2022)

Concerns and Recommendations

1. *Strengthen collaboration between health, housing, and social sectors to clarify roles relating to complex care housing*

There is an opportunity for enhanced and stronger engagement with the providers represented by this group, regarding the implementation of complex care housing in BC. It is our view that the Province should bring the health, housing, and homelessness-serving sectors together, as equal partners, to identify opportunities for collaboration, with the goal of delivering the highest level of care and support to those who will reside in complex care housing. Given complex care funds are set to flow through health authorities and that the current health authority-driven model does not include space for operators to provide input, there is a risk that complex care housing will only represent the service approaches and philosophies of one of multiple sectors involved in the complex care system, losing community voice in the process. Historically, collaboration between the health authorities and the housing sector has been challenging. Increased collaboration will only be successful if all sectors are involved as equal partners, recognizing that each sector brings their unique experience with the intersection between health and housing. This will also help avoid further fragmentation and disintegration of services and will ensure stronger alignment with the Ministry's strategic policy direction, particularly in response to priority populations.



Recommendation 1: The Province work with this coalition and other community-based providers across the province to collaboratively develop an implementation framework clearly articulating how the various ministries, health authorities, local governments, and community-based housing and service providers will work together as equal partners to deliver person-centred complex care housing.

2. *Focus on transitions and connections to supports and services, while centering people in development and delivery*

As is noted in the Ministry's draft strategic framework, we know transition planning for individuals who need support is critical. Inadequate discharge planning and a lack of support during transitions from more intensive care settings to lower levels of support results in damaging outcomes for people accessing care. The current interface between the systems and sectors associated with complex care can be difficult. To ensure the best possible outcomes for those living in a complex care setting and/or transitioning between different housing and health settings, it will be crucial to build a robust interface between community-based operators of supportive housing and the complex care housing system. Additionally, holistic wrap-around, culturally safe services need to be available in every community across the province, ensuring individuals are offered a range of choices to receive the right supports at the right time. Commitment from health authorities is key in successfully implementing this vision.

Recommendation 2: The Province invest in the development and implementation of standards of practice to govern all parties and each of the interfaces throughout the stepped continuum of supportive housing and complex care.

3. *Provide sustainable funding for staff compensation and increase focus on workforce development in connected sectors*

The ability of staff to establish and maintain trusting relationships with individuals accessing health and housing supports can have great influence on someone's willingness to access the services they need. Issues with recruitment and retention are facing many sectors and the sectors that interact with complex care housing are no exception. Especially in light of the current drug poisoning crisis, frontline workers are dealing with unprecedented trauma in their workplace. Concerningly, these problems have not been noted nor addressed in the current iteration of the Ministry's complex care framework. There is a risk that the unaddressed inequity in compensation in supportive housing and other frontline service jobs will lead to increased staffing challenges following the implementation of complex care housing.

With inadequate compensation levels, as well as other gaps in human resources, professional development/training, and a general inconsistency across operating agreements and budgets, a new stream of complex care housing could lead to unintended consequences including substantial workforce attrition in related sectors. Specifically, given the transferability in skills, under/inconsistently paid supportive housing and frontline workers may choose to transition into complex care housing, exacerbating pre-existing issues with staffing. To avoid significant upward pressure on complex care housing, parallel investments must be made in supportive housing and other community services.

Recommendation 3: The Province identify opportunities and provide funding for investments to reinforce levels of care outside of complex care housing to ensure a more resilient foundation of core services, paying particular attention to workforce development and retention at all levels, in all sectors.



We look forward to discussing these recommendations in greater detail on April 19th. We thank you for your time and consideration and we look forward to working with the Ministry as complex care housing comes to fruition.

Signed,

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