

**Submission to Employment and Social
Development Canada**

**TRUSTED EMPLOYER SYSTEM
FOR TEMPORARY FOREIGN
WORKERS**

August 2023

Trusted Employer System for Temporary Foreign Workers

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Introduction

Alberta, like the rest of Canada, has an aging population that will increase significantly in the coming years and is directly linked to the retirement of the baby boomer cohort. By 2051, one in five Albertans will be over 65¹. As we age, our needs often become more complex, requiring more support. This requires coordinated action from all levels of government and the organizations serving senior Albertans. Our aging population means more Albertans will require supports and services in the approaching years, and those currently working within the sector will be retiring. In Alberta's Occupational Outlook, 2021-2030, retirement-related job openings are expected to grow from 15 percent in 2021 to 22 percent in 2025². Another critical piece to consider is how staffing shortages impact the staff who continue to work to meet the needs of Albertans. COVID-19 has had a profound impact on our country, and there are many lasting impacts, particularly in the area of mental health.

The Alberta Seniors and Community Housing Association (ASCHA) comprises members working towards two incredibly important goals: supporting aging Albertans and supporting Albertans with affordability through housing delivery and respective supports. For our members to continue to do this, we must ensure they have access to appropriately trained staff. Seniors housing is diverse, and the providers of seniors housing are often equated with healthcare providers, which is not always the case. Our members offer a range of options for older Albertans, delivered by non-profit groups, public housing providers, and private operators. A strong seniors housing system is built on a range of person-directed options and honours individual choice, focusing on a wellness model of living. To provide clarity to Albertans, we organized different housing types into navigational categories:

Seniors Housing Accommodation Only:

This includes seniors housing settings that are strictly accommodation without any services or supports on-site. Housing terms such as "seniors' apartments" and "independent living" fall into this category, as well as the government program "Seniors Self-Contained." If a resident requires any services (such as homecare, housekeeping, meal delivery, etc.), they arrange it for themselves.

Seniors Housing with Service Options:

This category is more commonly understood as "seniors supportive living" in Alberta. This is where onsite services include meals, housekeeping, recreational activities, and laundry. Seniors housing with service options are licensed under the *Supportive Living Accommodation Licensing Act (SLALA)*, regardless of ownership type. Service options might be included in the rent; or separate pay option, depending on the site. If a resident/tenant required any health supports (such as homecare, etc.), they arrange it themselves.

Seniors Housing with Service Options & Health Supports:

This category is the largest of the three regarding the variety of options available. This is where some form of health supports are provided onsite, like 24/7 health care aides, LPNs, or RNs, for higher levels of health supports. "Designated Supportive Living" and "Memory Care" would fall under this category. Categories of service options and health supports depend on the resident's needs and the type of housing provider.

¹ [Alberta Population Projections 2023-2051, Published by Government of Alberta, July 5, 2023](#)

² [Alberta's Occupational Outlook, 2023 -2030, Published by Jobs, Economy, and Trade](#)



Aging Population & Sector Job Vacancies

As we know, Canada's population is aging and as we age, the services and supports we need generally increase and become more complex. Day-to-day activities, which may have been relatively simple at one time, become harder to carry out. Healthcare needs also increase and vary based on different factors; the Conference Board of Canada found that the care needs of the average senior are \$12,000 annually compared to \$2,700 for the rest of the population. The same report also found that, although seniors represented one-fifth of the total population in 2017-2018, they accounted for nearly half of all healthcare spending. For the provinces to continue with this trend, the provincial and territorial governments would need to increase funding to healthcare by \$93 billion between 2018 – 20283. This, combined with the quality of life for Canadians as they age, is why government approaches must be focused on providing wellness supports that promote better health outcomes. This report does not account for the impact of COVID-19 on healthcare spending, which we know has had a significant impact across Canada, or the lingering mental health issues of staff and residents that it left behind.

In March of 2023, job vacancies in healthcare and social assistance accounted for 144,500, or 17.7% of total vacancies nationwide, according to Statistics Canada⁴. Of that number, Alberta had 8,510 vacancies in the sector. Given the diversity of options, the sector requires many different staffing roles in addition to the above category of healthcare workers. There are significant vacancies in food services, maintenance, and housekeeping, and these vacancies threaten the ability of operators to provide needed support and services to vulnerable Albertans. These sectors are represented in the National Occupational Classification (NOC) in NOC 3 (Health Occupations), 4 (Education, Law and Social, Community and Government Services), and 5 (Art, Culture, Recreation, and Sport) occupations⁵.

Broader healthcare sector workforce challenges also compound our sector job vacancies. Seniors housing providers compete for the limited amount of qualified, trained staff against hospitals and long-term care facilities that have excellent benefits and, in some rural areas, even provide housing and meals as part of their employee benefits. This has meant that many housing providers must utilize agencies to fill vacancies at significant cost, which is not sustainable. They cannot operate and serve residents well without qualified staff to fill these critical roles.

In 2019, the World Health Organization included burnout in the *International Classification of Diseases* as an occupational phenomenon characterized as a syndrome resulting from chronic workplace stress that has not been successfully managed⁶. Although there are both situational and individual risk factors for occupational burnout, research indicates that one of the main causes is an unsustainable workload. *Gallup's Perspective on Employee Burnout: Causes and Cures* found that 63% of employees who say they very often or always experience burnout at work are more likely to take a sick day, 23% are more likely to visit an emergency room, and 2.6 times more likely to be actively seeking a different job⁷. A study commissioned by Workplace Strategies for Mental Health found that 35% of working Canadians identified as feeling burnt out. Health and patient care had the highest burnout rate at 53%.⁸

³ [Meeting the Care Needs of Canada's Aging Population, Conference Board of Canada, July 2018](#)

⁴ [The Daily, Payroll Employment, Earnings and Hours, and Job Vacancies, March 2023](#)

⁵ [National Occupational Classification 2021, Government of Canada, accessed August 2023](#)

⁶ [Burn-out an "occupational phenomenon": International Classification of Diseases, World Health Organization, May 2019](#)

⁷ [Gallup's Perspective on Employee Burnout: Causes and Cures, Gallup, 2020](#)

⁸ [Workforce Strategies for Mental Health, Canada Life, 2022](#)

Challenges to ensuring housing providers have access to a workforce of appropriately trained staff have been mounting in recent years. In late 2022, the Alberta Association on Gerontology held a Workforce Think Tank, with leaders in the sector attending following a review of the evidence, interviews, and webinar results to inform the discussion. One of the key issues identified was a diminishing labour supply and staff shortages, especially in Alberta's rural and remote communities.

A key outcome related to workforce was to ensure and evolve workforce supply with innovation in recruitment, robust education, and certifications to sustain a productive workforce in a changing world of work. One actionable item was to increase the work pool by allowing foreign workers trained in their country as Registered Nurses or Licensed Nurse Practitioners to work as Health Care Aides in Alberta⁹.

Key Recommendations

Our counterpart associations in other jurisdictions have been advocating for a program which would streamline the process for foreign-trained workers to work within the sector in Canada. We have adapted them to reflect Alberta's legislative and regulatory language:

- **Recommendation 1:** Upon creation of the Trusted Employer System, licensed seniors supportive living providers in good standing with their respective provincial regulators or other oversight bodies should automatically be considered "trusted employers" and be the responsible party for each individual temporary foreign worker (TFW) entering Canada.
- **Recommendation 2:** A Trusted Employer System should provide workers with an "Industry Based Permit" allowing TFWs to switch employers within the licensed seniors supportive living providers sector to allow TFW flexibility within the sector and to respond to specific needs in other regions.
- **Recommendation 3:** A Trusted Employer System should be exempt from the Labour Market Impact Assessment (LMIA) and allow workers to stay in Canada for 24 months before an extension is required or the worker must return to their home country.
- **Recommendation 4:** A Trusted Employer System should provide a dedicated portal or service mechanism for trusted employers to contact representatives from both ESDC and IRCC to receive status updates and process applications within both departments concurrently instead of the current system requiring a LMIA before IRCC can process an individual application.

These recommendations are not exhaustive, but they are a step towards ensuring Alberta's seniors housing providers have the appropriately trained staff to meet the needs of Albertans who call their communities' home. As a sector, we would prefer a process allowing these workers to enter Canada with an expedited path to becoming permanent residents. However, the most in-demand requirements are for NOC-3 and NOC-5 occupations, potentially excluding many through Canada's Express Entry immigration streams. The alternative is to bring qualified staff to Canada through the Temporary Foreign Worker Program or equivalent provincial programs.

⁹ [AAG Cultural Change Project, Enhancing Seniors' Services Workforce Think Tank, Alberta Association of Gerontology, December 2022](#)



During the last election, the federal government committed to establishing a Trusted Employer System to streamline the process for Canadian companies to hire temporary foreign workers to fill labour shortages that Canadian workers cannot fill. This issue is also referenced in the mandate letters for the newly appointed Alberta Minister of Immigration and Multiculturalism and the Alberta Minister of Health. It clearly represents a significant priority for all levels of government and the organizations serving Albertans in the sector. The mandate letters have an emphasis on rural Alberta, given the significant challenges rural communities have experienced in recruiting and retaining healthcare professionals. The recommendations above are intended to provide support for what our sector knows is an incredibly important issue that must be addressed. Our members work tirelessly towards realizing our Noble Cause: *Albertans live in housing that honours their dignity, serves their needs and inspires purpose in their chosen community*. We know this can only be accomplished through the right housing and supports for Albertans at any age, but even more so as they age. ASCHA welcomes any opportunity to speak to anything contained in this submission or, more broadly, on issues impacting Alberta's seniors and community housing sector. We can be reached at ascha@ascha.com or by calling our office at (780) 439 - 6473.

