More Convenient Care Act, 2025: New obligations to come for health care facility staffing agencies

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Ontario's Minister of Health has re-introduced legislation – Bill 11 or the *More Convenient Care Act, 2025* – that received Royal Assent on June 5, 2025. This legislation amends several existing healthcare related statutes, as well as introduces new legislation, with a view to improving efficiency and transparency and increasing the public's confidence in Ontario's healthcare system.

Among these legislative updates is the new *Health Care Staffing Agency Reporting Act, 2025*, which requires staffing agencies, which increasingly provide labour support to Ontario's public health facilities, to record and report on their services provided to hospitals, long-term care homes, and other health sector organizations. Of note, this particular Act is not yet in force; it will come into force on a future date to be named by order of the Lieutenant Governor in Council.

Background

The passage of the legislation comes amidst the context of staffing shortages at Ontario healthcare facilities which are estimated to have cost healthcare facilities $9.2 billion in agency fees between 2013 and 2023. The comments of Minister Jones at the time of the second reading of the legislation shed light on the government's motivations in putting forward the bill: strengthening transparency, as well as addressing the challenges posed by variance in agency staff rates across Ontario and the limited negotiating power of healthcare facilities in light of limited information sharing.

Proposed new obligations of health care facility staffing agencies

For the purpose of the legislation, a "health care facility staffing agency" is defined as a "temporary help agency" as defined in the *Employment Standards Act, 2000* (*i.e.* an employer that employs persons for the purpose of assigning them to perform work on a temporary basis for clients of the employer), that assigns any prescribed persons to perform work in or for a health care facility. A "health care facility," in turn, is defined as

a public hospital, the University of Ottawa Heart Institute, a long-term care home, or any other prescribed facility or provider.

The legislation will require that every six months (or such other time frame as may be prescribed), a health care staffing agency would have to "[…] submit a report to the Minister that contains the prescribed aggregate administrative, billing or pay rate information for health care facilities to which the agency assigns prescribed persons." Notably, the Minister of Health will be authorized to publish this information.

It will also require that health care facility staffing agencies maintain certain records, including contracts (*i.e.* agreements with health care facilities) and invoices relating to prescribed administrative, billing or pay rate information, for three years.

To enforce its requirements, the legislation provides that the Act and regulations prevail over any agreement to the contrary. It also stipulates that contravention of the Act is an offence punishable by fine of up to $10,000 for individuals or $25,000 for corporations.

Takeaways for staffing agencies and health care facilities

In addition to the increased administration effort associated with biannual reporting and record maintenance obligations, heath care facilities and staffing agencies should be aware that the reporting and publication of fees, billing structures, and pay rates are designed to increase transparency. This transparency may result in reduced reliance on staffing agencies, or increased competition to lower mark-ups where such agencies are used.

The intent of this legislation appears to be stabilizing workforce costs and encouraging more sustainable, permanent staffing models within hospitals and long-term care. Health care facilities may see increased pressure to justify staffing choices and prioritize long-term recruitment and retention strategies.

The *Health Care Staffing Agency Reporting Act, 2025* is one instance of government efforts to shift toward greater oversight and cost control in health system management. Other measures referred to in the *More Convenient Care Act, 2025* also aim to strengthen hospital governance and accountability, but limited detail has been provided thus far. These forthcoming measures, along with communications to hospital leadership regarding hospital sector financial health and stabilization, will likely work together to bring closer oversight and clearer expectations for hospital management, board performance, and service delivery.

Contact us

For more information on these updates, please reach out to any of the authors or key contacts below, or any lawyer from BLG's health care or labour & employment groups.

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