



March 13, 2019

The Hon. Sarah Hoffman, Deputy Premier, Minister of Health
Government of Alberta
423 Legislature Building
10800 - 97 Avenue
Edmonton, AB
T5K 2B6

Re: Paramedic Core-Flex Staffing Model

Dear Minister Hoffman:

As a representative organization, improvements that benefit Paramedics supports the mandate of the Association in enhancing knowledge, skills, and health and wellness.

You were included in the distribution of a letter dated November 28, 2018 and subsequent letter on December 20, 2018 where we addressed the Alberta College of Paramedics (College) on Extended Hours and the Core-Flex Model. The College responded by deferring responsibility as an issue of employment contract and not the jurisdiction of a professional regulator.

The Core-Flex model allows Paramedics to work continuously for up to 96 hours through a mix of semi-imaginary hours of work and on-call hours coupled with a perceived actual hour of work (time on task). Within the model, time on task hours accumulate at random over a 24-hour period. According to the *Employment Standards Code* (the Code), section 16, a maximum of a 12-hour work day is allowed or as identified within the *Employment Standards Regulation* (the Regulation) a 14-hour night. The Code nor the Regulation defines "on call" within these work hours and therefore we believe it is illegal. We argue that every hour that a Paramedic is expected to respond within a set number of minutes to perform paramedics skills within a physical and mental capacity should be considered hours of work.

Apart from this being illegal, this is not simply a contract issue but a matter of providing safe work places within a high intensity emergency health care environment. In 2009, it was determined that Emergency Health Services was health care and therefore appropriate funding was to be established to provide that service. While collective agreements are in place, the operational area of the Ministry of Health and Alberta Health Services (AHS) influence those decisions/negotiations of contracts through funding agreements. These agreements include both the direct delivery and contracted services. No matter what area within Alberta, the well being of the Paramedic should be the first concern.

To date, you have not responded to our call to action nor has this issue been addressed. While we didn't ask you directly before, as a leader, there is a responsibility that cannot be ignored especially when identified through research (see our attached study). We request your response to action to the Core-Flex model as we believe this is a responsibility of your Ministry, in conjunction with the Ministry of Labour, as a legislative breach of the Code.

If you would like to discuss this matter further, or any other aspects of the Association, please contact me at dusty@albertaparamedics.ca or 780-904-3619.

The Association looks forward to your response.

Sincerely,



Dusty Myshrall, ACP

President

Alberta Paramedic Association



CC The Hon. Christina Gray, Minister of Labour