

Ministry of Health
Hon. Christine Elliott
777 Bay Street, 5th floor
Toronto, Ontario
M7A 2J3

Ministry of Children, Community and Social Services
Hon. Todd Smith
438 University Avenue, 7th floor
Toronto, Ontario
M5G 2K8

March 8, 2021

Dear Minister Elliott and Minister Smith,

We are writing to you to express our serious concerns about the Ministry of Children, Community and Social Services (MCCSS) decision to close the 24 bed intensive mental health treatment program for youth with complex and acute mental health issues in secure custody and detention at Syl Apps Youth Centre (SAYC).

We are members of the independent Residential Services Expert Review Panel struck by the-then Ministry of Children and Youth Services in July 2015 to conduct a system-wide review of the Province's child and youth residential services system. Our review took place over several months and included site visits, documentary review and nearly 1,000 interviews of young people, service providers, experts in child and youth care and others. Our report was delivered in February 2016 and included several recommendations to improve the experience and outcomes of young people living in residential care.

We are appalled by the elimination of the specialized 24 bed capacity for the treatment of young people at Syl Apps Youth Centre. This program has saved lives; its closure may result in preventable child death. Syl Apps is the only evidence-based, intensive, secure residential treatment program in Ontario for young people struggling with life and death issues of suicidality, homicidal ideation and severe emotional and psychological challenges. It is absurd and reflective of a leap backward to include this program in an otherwise reasonable response to issues of underutilization in open and secure custody facilities across the province.

The Syl Apps program is a highly specialized provincial resource and takes referrals from other youth centres across Ontario that are unable to meet the intensive treatment needs of this group of young people. It supports youth with the most complex mental health issues in the Province. The clinical profiles of these youth are characterized by an average of four concurrent diagnoses. Their profiles include

high suicidality, major depression, bipolar disorder, personality disorder, significant behavioural issues, addictions and psychosis.

The Ministry appears to hold the view that youth referred to or served by Syl Apps can simply be absorbed into the system and receive mental health treatment services elsewhere in the system. Such assumptions have historically led to child death by suicide and violence in Ontario's custody facilities. There is an erroneous belief that the needs of these young people can be met with fragmented clinical resources: a social worker here, a psychologist there and tele-health supports from Sick Kids Hospital. The latter has indicated that they are by no means close to being capable of replacing the intensive treatment program offered at Syl Apps.

The clinical resources found in small numbers across other facilities in the province were never meant to provide specialized or intensive mental health treatment. These are general secure custody facilities without the capacity to provide intensive treatment to the 25% of the youth justice population with the most complex and acute mental health needs. The resources in other youth centres are insufficient and this is the reason why they refer the young people with the highest clinical needs, risks and behavioural profiles to Syl Apps.

The Syl Apps program has wrongly been included in a group of 26 open and secure Youth Justice facilities that are being closed by MCCSS. It is understood that there is a significant underutilization of secure and open custody beds across the system as a result of the impact of the Youth Criminal Justice Act, which since coming into force in 2003 has had a focus on prevention, diversion and alternatives to custody. We understand the Ministry's need to rationalize beds in underutilized facilities with a general mandate for the provision of secure and open custody and detention.

This, however, is not the case with the Syl Apps program. It's utilization rates over the past two years have ranged from 76% to 80% and waiting lists are often maintained for youth justice referrals. The Ministry has erroneously calculated utilization rates based on the number of beds (48) that they have licensed and not the "funded beds." The correct method to calculate utilization rates is to consider the beds that the centre is funded for as this is the number they are then able to serve.

For these reasons, we strongly urge you to re-consider the decision to close the 24 treatment beds at Syl Apps Youth Centre. Further, we request that consideration be given to a transfer to the Ministry of Health to establish appropriate oversight of, and necessary access to, this specialized provincial program for young people with acute mental health needs.

Thank you for your consideration and attention to this urgent and important matter.

Sincerely,

Original signed by:

Deborah Newman
Former ADM, Youth Justice Services
Retired Deputy Minister, Ontario Public Service
Member, Residential Services Review Panel 2016

Original signed by:

Kiaras Gharabaghi
Director, School of Child and Youth Care
Ryerson University
Member, Residential Services Review Panel 2016

Original signed by:

Nico Trocme
Director, School of Social Work
McGill University
Member, Residential Services Review Panel 2016

Cc Janet Menard, Deputy Minister, MCCSS
Helen Angus, Deputy Minister, MOH