

Community Living Accommodations for PDD-Funded Albertans: Recommendations for Effective and Appropriate Facilities Licensing



Advocacy Brief

Summary

Issue

Overnight staffed residences face longstanding issues related to inconsistency, appropriateness, and effectiveness rising from the licensing requirements and standards currently regulated under the Continuing Care Act (CCA).¹ While community living homes with 4 or more residents are subject to the same regulatory standards as supportive living accommodations, PDD homes with 3 or fewer residents currently have no licensing or facility-based regulations. The licensing regulations established under the CCA were developed primarily with a health care facility-lens and designed with seniors as the main population in mind. However, homes serving small numbers of individuals with developmental disabilities are required to comply with the same regulatory framework, despite having different needs, values, and service models.

Recommendations

Create supportive and effective regulations for PDD-funded community living homes through the following recommendations:

- (1) Replace existing continuing care accommodation licensing requirements with a **new set of simplified core standards appropriate for community-based service delivery to apply to all PDD-funded community living homes**. Accommodation standards would apply regardless of the number of residences and be based on principles supporting the right to personal freedoms, self-determination, and independence.

AND

- (2) **Establish a threshold** for the current accommodation licensing requirements to apply to community living homes, **applicable only where the number of residents far exceeds those typical in personal homes such that the setting resembles a facility-based care site**. The threshold for accommodation licensing would be based on consultation with individuals, their families, and service providers.

¹ *Continuing Care Act*, SA 2022, c C-26.7. Current as of December 2025. <https://canlii.ca/t/56nbf>

Background

- PDD (Persons with Developmental Disabilities) funds direct services, but does not fund housing or accommodations. Many individuals receiving PDD funding live either individually or with their roommates in homes in the community that are owned/leased by a PDD service provider, or owned/leased by the individual or their family. Housing costs (rent, mortgage, etc.) are often paid from the individual's AISH (Assured Income for the Severely Handicapped) income.
- All PDD contracted service providers are subject to contract monitoring and required by contract to be accredited under the ACDS Creating Excellence Together (CET) standards, or one of three other accrediting bodies approved by the Ministry of Assisted Living and Social Services (ALSS). Over 80% of PDD service providers are accredited under CET.
- Approximately 100 CET-accredited community disability service providers operate or manage PDD-funded homes across Alberta, which include overnight staffed residences, supported independent living accommodations, or independent support homes.
- Most PDD-funded overnight staffed residences are homes in the community similar to any other family home where 3-4 individuals reside together and share staffing supports. CCA regulations currently require PDD homes with 4 or more residents to be licensed and subject to the same regulatory standards as supportive living accommodations.² PDD homes with less than 4 residents currently have no licensing or facility-based regulations/standards other than any requirements of individual municipalities.
- In 2021, ACDS reported that approximately 78% of community operated overnight staffed residences housed 3 or fewer individuals. In contrast, only 12% of homes accommodated 4 residents.³ The significant decline between three-person and four-person homes indicates that licensing requirements may have discouraged operators from offering four-person living arrangements.

² Continuing Care (Ministerial) Regulation, Alta Reg 44/2024. Current as of September 2025. <https://canlii.ca/t/56l37>

³ ACDS. May 21, 2021. ACDS Data Brief: SLALA Licensing and PDD-funded Community Living Residences. Calgary, AB.



Challenges

PDD service providers have identified several ongoing challenges related to licensing.

Restricted personal freedoms and the right to self-determination in homes shared by a few people by applying standards and practices more suitable for large care facilities.

- Alberta's community inclusion model rests on the foundation that community supports for people with disabilities must be guided by principles of dignity and choice, and assessed by standards respecting the right to personal freedom, self-determination, and independence. This is especially important when considering how one lives in one's own home.
- Requirements under the CCA were not developed with a community inclusion lens applied to homes where a few individuals with developmental disabilities live together, but from a health care facility-based lens and with seniors as the primary population.
- This results in standards that are not philosophically or in some cases even logically aligned with current accreditation standards for PDD.

Inconsistent standards and oversight based only on whether a residence houses 3 or 4 individuals.

- There are no formal facility-based standards or oversight for PDD-funded homes with 3 or fewer residents, while homes with 4 or more residents are subject to standards and oversight appropriate for different types of facilities despite virtually no difference in staffing, service models, or clients.

Unreasonable red tape for operators, resulting in inefficiencies and impacting quality service delivery.

- Requiring the licensing of some PDD homes under CCA has resulted in these homes being impacted by other legislation and regulations that were either duplicative to existing processes (e.g., the Resident & Family Councils Act that is now included in the CCA), or inappropriate (e.g., health orders during the COVID-19 pandemic intended to respond to the increased risk to seniors in congregate care facilities that did not apply to the same extent for younger individuals with developmental disabilities in community settings).
- PDD service providers also face barriers to compliance with the standards, including environmental health and fire inspections where municipal or provincial bodies refuse to complete inspections due to resources, unclear mandates, and/or lack of clear inspection requirements. This has resulted in individual organizations having to seek exemptions or ending up in non-compliance situations, sometimes for several years.
- Large organizations operate dozens of community homes where some require licenses and other do not, despite having the same services, clients, and staffing models. The administrative burden associated with this process is significant.



Curtailed capacity and sustainability of the PDD program, including reduced housing choice for individuals.

- Housing choice for individuals is reduced as providing services in 4-resident homes is disincentivized by the administrative burden of licensing. This results in both reduced capacity and increased costs as homes are set up for 3 vs. 4 residents, or alternative cluster models are developed as a work-around (e.g., a duplex is operated with 3 residents on each side, but with operational overlap in services, socialization, and/or staffing).

Recommendations

Create supportive and effective regulations for PDD-funded community living homes through the following recommendations:

- (1) Replace existing continuing care accommodation licensing requirements with a **new set of simplified core standards appropriate for community-based service delivery to apply to all PDD-funded community living homes.**

Develop a new set of simplified core accommodation standards that are appropriate for PDD-funded community living homes **regardless of the number of residents**, and that are **based on principles and practices supporting dignity and the right to personal freedoms, self-determination, and independence.**

AND

- (2) **Establish a threshold** for the current accommodation licensing requirements to apply to community living homes, **applicable only where the number of residents far exceeds those typical in personal homes such that the setting resembles a facility-based care site.**

The threshold for the minimum number of residents before licensing is required would be **based on consultation** with individuals, their families, and service providers.

