

FREQUENTLY ASKED QUESTIONS: ROUTINE INSPECTIONS

1. Does the RHRA notify retirement homes before an inspection is done?

The RHRA is not required to provide prior notice of any type of inspection, including routine inspections. However, our Inspectors will generally provide notice of routine inspections the day before the inspection takes place.

2. What happens if key staff members of the retirement home are not available when an RHRA Inspector arrives to conduct an inspection?

Specific staff members are not required to be in the retirement home during the inspection. There only needs to be a staff member present to retrieve the required documents. If a key staff member (such as the retirement home's operator or general manager) is not present during the inspection and would like to be debriefed the following day, the Inspector will accommodate the request.

3. What can a retirement home operator do if they disagree with the findings of an RHRA inspector?

Inspectors will discuss their findings during a debrief, which may not occur on the day of the Inspector's visit but can be expected prior to the draft inspection report. At that time, Licensees are encouraged to address any questions or concerns they may have with the Inspector. This discussion will be taken into consideration when preparing the draft inspection report. The Licensee can also respond to the draft report if they have further concerns, along with any steps were taken to address the findings. This information will all be reviewed prior to issuing the final report and posting it online on the RHRA's Retirement Home Database.

4. After an inspection has been completed, how soon will the retirement home operator be notified of any findings of non-compliance?

RHRA Inspectors communicate findings of non-compliance during the inspection debrief. An Inspector may not be able to conduct a full debrief on the day of inspection if further information or analysis is needed. However, the retirement home operator will be advised of all findings of non-compliance prior to receiving the draft inspection report.

The RHRA encourages all retirement home operators to start addressing areas of non-compliance identified by the Inspector immediately following the inspection debrief – there is no reason to wait until the draft inspection report has been prepared.

5. How can retirement home operators best prepare for the documentation review that takes place during an inspection?

Inspectors will be focused on effective implementation of practices to protect the welfare of residents. Accordingly, you should prepare to be asked for the following documentation:

- A list of residents, including their date of residency in the home and any subsidized residents
- A list of all staff employed by the home, including their name, department, position and date of hire
- Logs or records that demonstrate how the home responds to incidents such as, falls, complaints, behavior management incidents, incidents of abuse or alleged abuse
- Public health consultation records and
- Emergency Plan testing/evacuation records and current arrangements

During the inspection, the inspector will also request:

- A list of staff records for a selection of staff, including current staff training records and content of training
- Assessments and Plans of Care for a selection of residents and
- Medication Administration Records and corresponding physician orders for a selection of residents

Depending on the Inspector's observations in the home and/or the home's compliance history, the Inspector may ask to see further documentation relating to implementation concerns. Retirement home operators should have their records well-organized and in an accessible location. This ensures they are available for the RHRA Inspectors, and also that records relevant to the welfare of residents are readily accessible for staff of the retirement home at all times. If the home's documents are in an electronic format, a staff member who is familiar with the system will need to assist the Inspector in order to verify compliance. Homes should also consider making copies or electronic scans of these records for Inspectors to keep.

Some retirement homes choose to keep an 'inspection binder' of such records. This is helpful for Inspectors if the binder is up-to-date.

6. How can retirement home operators best demonstrate evidence of staff and volunteer training for RHRA Inspectors?

Some retirement homes keep a master training record or attendance sheet setting out the training and the date upon which it was completed by each staff member or volunteer. This is acceptable as long as the record demonstrates training on the site-specific policies of the retirement home (and not simply generic templates).

It is up to licensees to determine their procedures for recording the training provided to staff who work in the home, and any volunteers who participate in the lives and activities of residents.

7. What do RHRA Inspectors look for with respect to the approval of Plans of Care by residents and their substitute decision makers?

RHRA Inspectors look for communication between the home and the resident or their Substitute Decision Maker (SDM) about the Plan of Care and any revisions made to it. The RHRA recognizes that an actual signature demonstrating approval of the Plan of Care, or a revision to it, may not be practical in each situation; however, Inspectors will require some evidence of approval for changes. What is appropriate in each situation will vary based on the circumstances at hand.

Subsection 62(9) of the *Retirement Homes Act, 2010* requires approval of a resident's Plan of Care by

the following persons every time a new Plan of Care is made, or an existing Plan of Care is revised:

- The resident or the resident’s substitute decision maker (SDM); and
- A member of the College of Physicians and Surgeons of Ontario (CPSO) or the College of Nurses of Ontario (CNO), or a person acting under the supervision of a member. However, if there is reason to believe a resident may require dementia care, skin and wound care, or the use of a personal assistance device, the approval must be from a member of the CPSO or CNO.

Under subsection 62 (9), licensees are also required to provide a copy of the Plan of Care, or any revisions to the Plan of Care, to the resident and any other person who must approve the Plan of Care.

It is up to licensees to determine their procedures for meeting these requirements. The [Assessments and Plans of Care Compliance Assistance Module](#) (CAM) is designed to support homes with voluntary compliance and is available on the RHRA website.

8. What is the Regulatory Program Modernization (RPM) initiative?

The RHRA is modernizing its oversight approach to focus its inspections on areas of greatest risk to the safety and quality of life of seniors in order to improve outcomes.

The RHRA Inspectors will spend more time observing processes and daily life within a retirement home, and less time doing policy reviews. Inspection activities will be proportional to risk of harm to residents. This will reduce the regulatory burden on compliant homes and allow the RHRA to dedicate its resources where they are needed most.

The RHRA will seek stakeholder input, pilot and field test processes and provide other opportunities for stakeholders to provide input during this multi-year project.

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