

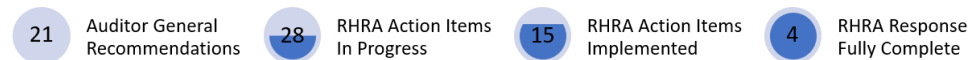
## Implementation Plan on the Auditor General of Ontario's Value for Money Audit Recommendations

On December 7, 2020, the Office of the Auditor General of Ontario (Auditor General) released its 2020 annual report. The report included the results of the Auditor General's value-for-money audit of retirement homes oversight in Ontario, and it provided the Retirement Homes Regulatory Authority (RHRA) with recommendations. In the report, the Auditor General made 21 recommendations to strengthen RHRA's ability to effectively fulfil our mandate.

RHRA appreciates that the report recognizes the organization's considerable progress and encourages continued and accelerated focus on existing project initiatives, several of which are noted to be in alignment with RHRA's identified strategic priorities.

RHRA is committed to meeting its mandate to the fullest extent possible, and to sharing its progress in a robust and transparent manner.

Note: Statuses noted are based on RHRA's self-assessment. Final assessment will be completed by the Auditor General of Ontario.



**Update as of December 31, 2021:** RHRA has adjusted timing to implement certain action items; these updates are captured below. The adjustments made are resulting from RHRA updating its finance plan following its fee review process; for further details see: [Fee Consultation – Retirement Homes Regulatory Authority \(rhra.ca\)](#). Specifically, RHRA's financial plan outlines a reduction of anticipated revenue for 2022. RHRA has moderated its activity (including actions to respond to the Auditor General's recommendations) to reflect its resource constraints and other priorities. While RHRA has focused its efforts on matters posing high risk to residents, in general, all recommendations will be implemented. It is possible that RHRA may determine a few actions may no longer be appropriate for implementation. These will be noted as they are identified.

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #2</b>                    | To protect residents of retirement homes who may require increasing levels of care, and in some cases to the extent of level of care provided in long-term-care homes, we recommend that the Retirement Homes Regulatory Authority work in conjunction with Ontario Health, the Ministry of Long-Term Care and the Ministry for Seniors and Accessibility to: | <b>Status</b>     |
|---|---|-------------------|
| Action Items                                | <ul style="list-style-type: none"> <li>• resume and accelerate its work to develop different and appropriate approaches to regulate different types of retirement homes with consideration of the evolving resident health profiles;</li> </ul>   | In progress       |
|   | <ul style="list-style-type: none"> <li>• examine, reassess and identify the most efficient and cost-effective way to deliver support services in retirement homes for the safety and protection of residents;</li> </ul>  | Not yet initiated |
|   | <ul style="list-style-type: none"> <li>• implement an inspection process (assigning clear roles and responsibilities), as soon as possible that sufficiently addresses the increasing complexities and levels of care required for residents in retirement homes; and</li> </ul>  | In progress       |
|   | <ul style="list-style-type: none"> <li>• take more timely and rigorous compliance support or enforcement actions against retirement homes that do not provide adequate care services to residents.</li> </ul>   | Fully implemented |
| <b>Target Completion Date – Winter 2022</b> |   |                   |

Steps Taken

- Re-initiated a project to evaluate different types of approaches in accounting for variance among retirement homes.
- Sought and obtained approval of *Request for Information Policy* from Minister for Seniors and Accessibility to enable collection of aggregate resident profile information
- Put in place dedicated resources to monitor and enforce compliance of retirement homes and provide compliance support to retirement homes
- Included resumption of the licence classes evaluation project in fiscal year (FY) 2021/2022 Business Plan
- RHRA hired inspectors with increased clinical knowledge to strengthen its capabilities to understand and address issues related to increasing complexities and levels of care
- Added staff resources to supplement online operator compliance assistance materials and mitigate the number of incidents requiring enforcement action
- Adopted enhanced inspection approaches that consider a retirement home’s compliance history, risk assessment and residents
- Amended inspection overview procedure and escalation to enforcement process for non-compliant licensees

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

Steps to be Completed

- Collaborate with Ministry for Seniors and Accessibility (MSAA) in its comprehensive review of the *Retirement Homes Act, 2010*
- Assess RHRA inspection workforce for addressing increasing complexities and levels of care

|  |  |             |
|--|--|-------------|
| <b>Recommendation #3</b>   | To allow it to make more effective, timely, data-driven decisions to strengthen the oversight of staffing and care services provided in retirement homes and support the Ministry for Seniors and Accessibility (MSAA) in developing policy on senior housing and care, we recommend that the Retirement Homes Regulatory Authority: |             |
| Action Items   | <ul style="list-style-type: none"> <li>• work with the Ministry to obtain the necessary approvals to collect needed information as soon as possible;</li> </ul>  | In progress |
|  | <ul style="list-style-type: none"> <li>• in conjunction with the Ministry, establish processes to collect data on residents and retirement homes from other relevant organizations with consideration of appropriate processes to respect the protection of personal health information; and</li> </ul>                              | In progress |
|  | <ul style="list-style-type: none"> <li>• commence the collection, analysis and use of this information to inform policy development in this sector.</li> </ul>   | In progress |
| <b>Target Completion Date – Winter 2022<br/>Updated to – Winter 2023</b> |  |             |

Steps Taken

- Sought and obtained approval of *Request for Information Policy* from Minister for Seniors and Accessibility (MSAA) to enable collection of needed information
- Submitted to Ontario Health data request on retirement homes residents waiting for placement in long-term care
- Developed a plan for stakeholder consultation on data collection and analysis that will inform policy recommendations to MSAA
- Supported MSAA on potential legislative changes regarding obtaining resident and substitute decision maker (SDM) contact information

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

- On October 28, 2021, the Minister of Long-Term Care introduced the [Providing More Care, Protecting Seniors, and Building More Beds Act, 2021](#), which includes proposed amendments to the *Retirement Homes Act, 2010*. This Bill included proposals related to data collection for resident and SDM contact information. The Bill was passed and received Royal Assent on Dec 9, 2021.

Steps to be Completed

- Engaged in process to put in place a new technology platform to aid data collection
- Build a data strategy for data governance and security and ensure protection of all data, including personal health information
- Due to organizational restructuring at Ontario Health, RHRA’s data request experienced delays.
- Undertake stakeholder consultation on data collection and analysis.

| <b>Recommendation #4</b> | <b>So that risks and harm to retirement home residents can be more effectively reduced through more frequent and risk prioritized inspections, we recommend that the Retirement Homes Regulatory Authority</b> | <b>Status</b> |
|--------------------------|--|---------------|
| Action Items             | <ul style="list-style-type: none"> <li>expand the factors considered, beyond just inspection history, in its risk model for selecting homes for more frequent inspection.</li> </ul>                           | In progress   |

**Target Completion Date – Winter 2022**

Steps Taken

- Submitted data request to Ontario Health on number of retirement homes residents waiting for placement in long-term care
- RHRA has been approved for data-sharing under the Ministry of Revenue Act to enhance the RHRA risk model with relevant financial indicators

Steps to be Completed

- Identify other relevant data for inclusion in risk assessment of harm outside of information collected through inspections

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #5</b>   | <b>To confirm that retirement homes have appropriate infection and prevention controls in place, we recommend that the Retirement Homes Regulatory Authority:</b>   | <b>Status</b>     |
|--|---|-------------------|
| Action Items   | <ul style="list-style-type: none"> <li>• put processes, including continuing use of its COVID-19 checklist, in place to assess whether all retirement homes have appropriate practices on infection prevention and control;</li> </ul>    | Fully implemented |
|  | <ul style="list-style-type: none"> <li>• routinely obtain data from public health officials on issues or concerns in retirement homes;</li> </ul>   | In progress       |
|  | <ul style="list-style-type: none"> <li>• regularly incorporate into its inspector training any lessons learned from public health inspections; and</li> </ul>   | Not yet initiated |
|  | <ul style="list-style-type: none"> <li>• going forward, request that retirement homes incorporate pandemic plans in their emergency plans that also address the requirement to include a personal protective equipment supply.</li> </ul> | In progress       |
| <b>Target Completion Date – Winter 2022<br/>Updated to – Winter 2023</b> |   |                   |

Steps Taken

- Updated routine inspection forms to include additional infection prevention and control (IPAC) assessment focus areas
- Provided advice to MSAA in its comprehensive review of the *Retirement Homes Act, 2010* on recommended legislative and regulatory changes to allow greater information sharing with public health partners and requirements for pandemic plans
- Developed and distributed IPAC Compliance Assistance Material to assist retirement home licensees and operators in understanding their obligations under the Retirement Homes Act as it relates to IPAC
- Shared information and reinforced the participation of retirement homes in IPAC Hubs
- Reinforced expectations related to IPAC
- Increased inspection staff capacity
- Working with the Canadian Red Cross to support retirement homes that have been escalated for additional IPAC and non-clinical staffing interventions
- Made resources [available online](#) to provide operators with COVID-19 materials and resources to support IPAC, including COVID-19 checklists
- Amended training and evaluation of compliance on an ongoing basis as Chief Medical Officer of Health (CMOH) directives, MSAA recommendations and RHRA compliance standards changed
- Continual use of COVID-19 checklist when significant IPAC concerns are identified through proactive outreach activities or information received from external sources

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

Steps to be Completed

- Pending government decisions related to information sharing, RHRA will incorporate any high-level learnings and/or insights obtained from public health data into inspector training

| Recommendation #6                           | To return to its proactive, routine inspection process focused on resident safety, care and choices about their care options, we recommend that the Retirement Homes Regulatory Authority:   | Status            |
|---|--|-------------------|
| Action Items                                | <ul style="list-style-type: none"> <li>• establish an appropriately prioritized action plan that includes targeted timelines to clear the backlog of proactive routine inspections, enhanced with additional infection prevention and control coverage;</li> </ul> | Fully implemented |
|   | <ul style="list-style-type: none"> <li>• conduct the required inspections; and</li> </ul>  | In progress       |
|   | <ul style="list-style-type: none"> <li>• monitor its compliance with this plan.</li> </ul>   | In progress       |
| <b>Target Completion Date – Winter 2022</b> |  |                   |

Steps Taken

- Communicated with licensees in August 2020, outlining expectations of retirement homes for a “Return to Normal” on items it had temporarily paused in March 2020 due to the COVID-19 pandemic
- Resumed routine inspections on an unannounced basis
- Added IPAC focus areas to existing inspection form
- Finalized a prioritization plan to aid internal monitoring and analysis of progress
- Continuing to conduct proactive routine inspections to clear backlog, while being responsive in conducting reactive inspections

Steps to be Completed

- Hiring additional full-time and surge program inspectors to meet inspection requirements, and undertaking inspector training

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #7</b> | To fully self-assess and monitor its inspection process for coverage and distribution of work, we recommend that the Retirement Homes Regulatory Authority | <b>Status</b> |
|--------------------------|--|---------------|
| Action Items             | <ul style="list-style-type: none"> <li>continually monitor inspector caseloads, revisit caseload targets and reassign cases as needed.</li> </ul>          | In progress   |

**Target Completion Date – Winter 2021  
Updated to – Winter 2022**

|   |
|---|
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Created a report on current and projected inspector workloads that is used to identify resource gaps by geographical regions</li> </ul>  |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>Revise inspection target numbers based on the projected inspection volumes and resources available</li> <li>Distribute work of inspections based on skill sets, workload and knowledge</li> <li>Develop a system for monitoring time spent by inspectors on inspections and other regulatory activities</li> </ul> |

| <b>Recommendation #8</b> | To minimize the safety, health and other impacts to residents and families of residents in retirement homes that undergo management orders, we recommend that the Retirement Homes Regulatory Authority:  | <b>Status</b>  |
|--------------------------|---|--|
| Action Items             | <ul style="list-style-type: none"> <li>establish a back-up network of qualified management candidates that can be quickly deployed to retirement homes during times of crisis;</li> <li>establish criteria for making emergency funding available should managers deployed to a retirement home under management order require justifiable financial resources; and</li> <li>in conjunction with the Ministry for Seniors and Accessibility (MSAA), ensure that residents in retirement homes are protected in a manner consistent with residents in long-term-care homes in circumstances of public health threats during and beyond the COVID-19 pandemic.</li> </ul> | <p>Fully implemented</p> <p>In progress</p> <p>In progress</p> |

Target Completion Date – Winter 2023

Steps Taken

- Developed and maintain a formal vendor of record roster of qualified management candidates
- Established criteria and implemented a program for the provision of temporary crisis funding to homes where financial constraints are a barrier to protect residents, through a Transfer Payment Agreement with MSAA
- Released ongoing guidance for visiting retirement homes under the Retirement Homes COVID-19 Visiting Policy which reflects guidance from the CMOH Office
- Supported MSAA in increasing uptake of rapid antigen screening and in revising the testing policy for retirement homes based on public health advice
- Supported the Province's roll out of vaccines in retirement homes. In December 2020, at the request of the MSAA, RHRA conducted a survey of all licenced retirement homes and ensured 100% completion to inform allocations required for the sector. RHRA also has distributed key information to retirement homes to support their readiness for vaccinations
- RHRA provided support and advice to MSAA as the Province continues to re-open and modify restrictions. This includes feedback on updates to the *Retirement Home Policy to Implement Directive 3*
- RHRA issued guidance on *Immunization Policy*
- RHRA issued a *Recommendation for Asymptomatic COVID-19 Screen Testing for Retirement Homes*

Steps to be Completed

- Explore the possibility of a sustained program of making funds available for crisis circumstances where retirement homes are not able to manage financially to protect residents



**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #9</b> | <b>To protect retirement home residents from the risk of neglect, we recommend that the Retirement Homes Regulatory Authority</b>   | <b>Status</b>     |
|--------------------------|---|-------------------|
| Action Items             | <ul style="list-style-type: none"> <li>communicate and support retirement homes in ensuring that family members and friends providing critical personal care and support to retirement homes residents are able to do so during the pandemic, as long as appropriate infection prevention and control procedures are followed.</li> </ul> | Fully Implemented |

**Target Completion Date – Winter 2021**

|  |  |
|--|--|
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Advised MSAA on concerns about visitor policy restrictions and the impact on resident physical and mental well-being</li> <li>Communicated to the CMOH regarding concerns with current restrictions and the impact on resident well-being</li> <li>Reviewed the Visitor Policy and continue to make recommendations to MSAA</li> <li>Identified homes to participate in a proactive Canadian Red Cross pilot program to increase IPAC measures</li> <li>Continue to communicate and support retirement homes in adhering to public health directives and guidance, including appropriate IPAC procedures for visitors, as provincial pandemic response evolves</li> </ul> |  |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>No outstanding action items</li> </ul>  |  |

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #10</b> | <b>To better inform the public about the extent of COVID-19 cases in retirement homes, we recommend that the Retirement Homes Regulatory Authority:</b>  | <b>Status</b>     |
|---------------------------|--|-------------------|
| Action Items              | <ul style="list-style-type: none"> <li>work with the Ministry for Seniors and Accessibility and the Ministry of Health to obtain available validated data directly from the Ministry of Health or directly from local public health agencies; and</li> <li>publish outbreak data on a weekly basis or more frequently as available, by retirement home, on the number of residents and staff who test positive or die</li> </ul> | Fully implemented |

**Target Completion Date – Winter 2021**

|  |  |
|--|--|
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Ongoing publication on the RHRA website of daily self-reported COVID-19 outbreak data and case-level information (infections and deaths for residents) by retirement home</li> <li>Ongoing work with local partners to monitor and support retirement homes in outbreak</li> <li>Assessed Public Health data and decided that it is not useable for daily reporting on the RHRA public dashboard; rather, RHRA uses retirement homes’ self-reported data</li> </ul> |  |
|--|--|

|   |  |
|---|--|
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>No outstanding action items</li> </ul> |  |
|---|--|

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #11</b>  | To identify alternative accommodations for patients should future waves of COVID-19 overwhelm long-term-care homes and hospitals, and for residents who need to be moved from retirement homes that are affected by outbreaks, we recommend that the Retirement Homes Regulatory Authority:   | <b>Status</b>                         |
|--|---|---------------------------------------|
| Action Items   | <ul style="list-style-type: none"> <li>work with the Ministry for Seniors and Accessibility to require retirement homes to provide monthly occupancy information (and any related requirements) to the Retirement Homes Regulatory Authority; and</li> <li>collect occupancy rates of retirement homes on a monthly basis to be used for monitoring and planning outbreak responses that may be needed during the COVID-19 pandemic.</li> </ul> | <p>In progress</p> <p>In progress</p> |
| <b>Target Completion Date – Winter 2022<br/>Updated to – Winter 2023</b>   |   |                                       |
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Sought and obtained approval of <i>Request for Information Policy</i> from Minister for Seniors and Accessibility</li> <li>Included a data collection project as part of the FY 2021/22 Business Plan</li> <li>Worked with MSAA to determine ongoing occupancy data collection needs and at what frequency for COVID-19 planning purposes.</li> </ul>   |   |                                       |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>Undertake public consultation to advise stakeholders of our intent to periodically collect occupancy information</li> <li>Assess data collection process options, while considering RHRA’s technology capabilities, cost efficiency and minimizing administrative burden on licensees</li> <li>Collect occupancy data on a periodic basis for the remainder of fiscal year 2021-22</li> </ul> |   |                                       |

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #12</b>  | <b>To strengthen the licensing process of retirement homes, and the safety and protection of residents that may require different levels of services as its primary focus, we recommend that the Retirement Homes Regulatory Authority:</b> | <b>Status</b> |
|--|---|---------------|
| <b>Action Items</b>  | <ul style="list-style-type: none"> <li>• accelerate and complete the development of its licence classes;</li> </ul>   | In progress   |
|  | <ul style="list-style-type: none"> <li>• update its licensing procedures to include conducting applicant background checks to identify any indication of financially irresponsible conduct and proof of financial viability;</li> </ul>     | In progress   |
|  | <ul style="list-style-type: none"> <li>• develop a communications strategy to remind applicants that they are obligated to monitor their licence conditions and report changes as needed to the Authority (RHRA); and</li> </ul>            | In progress   |
|  | <ul style="list-style-type: none"> <li>• follow up on a timely basis any licence conditions made.</li> </ul>  | In progress   |
| <b>Target Completion Date – Spring 2022<br/>Updated to – Winter 2022</b> |   |               |

Steps Taken

- Revised and implemented licensing forms to inform applicants of the RHRA’s use of third parties to conduct checks to ensure licensure eligibility. This includes the identification of financial irresponsibility indicators
- Expanded capacity for ongoing compliance monitoring for issues, including licence conditions
- Work on the Alternate Assurance Evaluation Project has resumed
- Revised criteria and procedures for enhanced background checks, including indicators of financial irresponsibility

Steps to be Completed

- Advise MSA in its review of the *Retirement Homes Act, 2010* to examine approaches to strengthening the licensing framework for retirement homes
- Define approach to monitoring financial stability of homes, once licenced, and document
- Communicate to homes about financial responsibility
- Ongoing evaluation and recommendations developed for future Alternate Assurance model/approach

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #13</b> | <b>To protect retirement home residents from the risk of fire, we recommend that the Retirement Homes Regulatory Authority:</b>   | <b>Status</b>     |
|---------------------------|---|-------------------|
| <b>Action Items</b>       | <ul style="list-style-type: none"> <li>impose a deadline for all licensees that have not completed the installation of their fire sprinkler systems to have this done as soon as possible; and</li> </ul> | Fully implemented |
|                           | <ul style="list-style-type: none"> <li>if a licensee does not comply, follow up with enforcement action where appropriate.</li> </ul>   | Fully implemented |

**Target Completion Date – Winter 2021**

Steps Taken

- Communicated to homes an expectation and timeline for compliance with the Ontario Fire Code requirements
- Taken additional enforcement measures, including revoking one licence
- Examined appropriate enforcement action for homes that have not yet provided evidence that they have sprinklers or an acceptable alternative solution
- Finalized decisions on enforcement action with licensees who have not provided proof of Ontario Fire Code compliant sprinkler systems

Steps to be Completed

- No outstanding action items

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #14</b> | To protect consumers from unknowingly purchasing accommodation and care services from retirement homes that could possibly be unlicensed and unregulated under the <i>Retirement Homes Act, 2010</i> , we recommend that the Retirement Homes Regulatory Authority:                   | <b>Status</b> |
|---------------------------|---|---------------|
| Action Items              | <ul style="list-style-type: none"> <li>expedite the completion of its strategy to follow up on the 234 retirement homes that may possibly require a licence and take appropriate enforcement actions as required; and</li> </ul>  | In progress   |
|                           | <ul style="list-style-type: none"> <li>expedite the consideration and reduction of the potential risk to these homes in subsequent waves of COVID-19 by either addressing the risk or bringing these risks to the attention of the Ministry for Seniors and Accessibility.</li> </ul> | In progress   |

**Target Completion Date – Winter 2021  
Updated to – Winter 2022**

- Steps Taken
- Drafted and trained staff on an unlicensed homes procedure
  - Advised MSAA of the scope and scale of the unlicensed homes project and the types of congregate settings captured as part of this initiative
  - Following up with prioritized homes and determining where enforcement action is warranted
  - Developed a communication plan to inform other sectors about the lack of oversight in such congregate care settings
  - Established an ongoing program to address potential risk to these homes in subsequent COVID-19 waves

- Steps to be Completed
- Continue to assess, on a risk-informed basis, which congregate settings that previously did not meet the legislative definition of a retirement home under the Act may now be subject to the Act due to change in their circumstances and report back to MSAA
  - Collaborate with and provide advice to MSAA on its review of the Act to support the establishment of appropriate oversight of congregate settings
  - RHRA will act on recommendations regarding the unlicensed homes monitoring initiative contained in the 2020-21 Risk Officer Report

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

|  |  |             |
|--|--|-------------|
| <b>Recommendation #15</b>  | To improve the Retirement Homes Regulatory Authority’s effectiveness in overseeing the retirement home sector and protect public safety, we recommend that the Authority   |             |
| Action Items   | <ul style="list-style-type: none"> <li>work with the Ministry for Seniors and Accessibility to critically assess the effectiveness of its enforcement tools. In particular, an increase of the maximum administrative penalty amount allowed under the <i>Retirement Homes Act, 2010</i> could be considered.</li> </ul> | In progress |
| <b>Target Completion Date – Winter 2022</b>  |  |             |
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Provided advice to MSAA in relation to the enhanced management orders to reduce implementation barriers and provided preliminary feedback on administrative monetary penalties</li> <li>Engaged in ongoing discussions with MSAA regarding potential legislative changes</li> <li>On October 28, 2021, the Minister of Long-Term Care introduced <i>the Providing More Care, Protecting Seniors, and Building More Beds Act, 2021</i>. In addition to proposed amendments to the <i>Retirement Homes Act, 2010</i> (RHA). Included in this Bill are provisions related to management orders and enhanced compliance orders. The Bill was passed and received Royal Assent on Dec 9, 2021</li> </ul> |  |             |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>Undertake a critical assessment of RHRA’s enforcement tools (including administrative penalties) to make an evidence-informed decision</li> </ul>   |  |             |

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #16</b>   | <b>To reduce the risk to retirement home residents that could be affected by loss or damage to their homes, we recommend that the Retirement Homes Regulatory Authority:</b>  | <b>Status</b>     |
|---|---|-------------------|
| <b>Action Items</b>   | <ul style="list-style-type: none"> <li>request that retirement homes renew policies 30 days prior to expiry and notify the Authority that ongoing coverage of residents is available;</li> </ul>  | Not yet initiated |
|   | <ul style="list-style-type: none"> <li>assess current research, and as necessary supplement, to derive an appropriate specific minimum amount of extra expense insurance coverage for licensees to obtain; and</li> </ul>   | Not yet initiated |
|   | <ul style="list-style-type: none"> <li>recommend a regulatory change that either specifies a minimum amount of extra expense insurance coverage to the Minister for Seniors and Accessibility or provides authority for the Authority to set a minimum amount of extra expense insurance coverage.</li> </ul> | Not yet initiated |
| <b>Target Completion Date – Fall 2022<br/>Updated to – Spring 2023</b>                                  |   |                   |
| <u>Steps to be Completed</u> <ul style="list-style-type: none"> <li>Work is not yet underway</li> </ul> |   |                   |



**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #17</b>  | To enhance the public’s knowledge and awareness of the Authority’s oversight role for the retirement home industry and to minimize safety risks to retirement home residents, we recommend that the Retirement Homes Regulatory Authority   | <b>Status</b> |
|--|---|---------------|
| Action Items   | <ul style="list-style-type: none"> <li>develop a more comprehensive communications strategy to specifically target groups that include residents and families, retirement home staff, and the public about its role, emphasizing how complaints can be best brought to its attention or to the attention of other appropriate parties.</li> </ul> | In progress   |
| <b>Target Completion Date – Winter 2021<br/>Updated to - Fall 2022</b>   |   |               |
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Implemented a campaign to raise awareness among target audiences of how to bring complaints to the RHRA</li> <li>Increased campaign resources to enable outreach to allied health professions</li> <li>Implemented a new, plain-language complaint form</li> <li>Provided advice to MSAA, as part of its legislative review, on the removal of barriers to information sharing to enhance complaints handling</li> <li>Developed a process to refer or facilitate the hand-off of non-retirement homes related complaints to other authorities having jurisdiction, as appropriate</li> <li>Clarified on the RHRA website how complaints are referred to other authorities having jurisdiction</li> </ul> |   |               |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>RHRA will explore partnerships with allied health professions to amplify RHRA messages regarding complaints and how to bring them to the RHRA’s attention.</li> </ul>   |   |               |

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #18</b>                   | <b>To provide for more clarity and timely responses to retirement home residents, family members of residents, or other persons who may have concerns about retirement homes, we recommend that the Retirement Homes Regulatory Authority:</b>  | <b>Status</b>     |
|---|---|-------------------|
| Action Items                                | <ul style="list-style-type: none"> <li>develop a form letter containing contact information for other regulatory bodies and send the letter to all complainants at the earliest opportunity before it investigates the complaints;</li> </ul>   | Fully implemented |
|   | <ul style="list-style-type: none"> <li>establish a process to refer complaints not within its jurisdiction directly to the appropriate regulatory body and follow up with the complainant and the other regulatory body to ensure that the complaint has reached the appropriate organization;</li> </ul> | Fully implemented |
|   | <ul style="list-style-type: none"> <li>update its website to include contact information of all regulatory bodies to address concerns that the public commonly brings to the Authority’s attention but are outside of the Authority’s jurisdiction;</li> </ul>  | Fully implemented |
|   | <ul style="list-style-type: none"> <li>establish a performance indicator to measure turnaround time for investigating and resolving complaints, set and review targets on an annual basis and monitor relevant performance; and</li> </ul>  | In progress       |
|   | <ul style="list-style-type: none"> <li>publish expected service standards about its complaint resolution process and its actual performance against these standards on its website.</li> </ul>  | Not yet initiated |
| <b>Target Completion Date – Winter 2023</b> |   |                   |

Steps Taken

- As part of its legislative review, provided advice to the MSAA on increasing the ability to share information
- Updated complaints procedure to note that RHRA staff will provide contact details of other regulatory bodies or agencies to complainants
- Developed and published on the RHRA website a list of applicable agencies and regulatory bodies the public might need to contact, based on type of complaint
- Developed a process which, pending legislative changes, will allow RHRA referrals through consent or current exemptions under the Act to remove barriers to access for complainants who are referred to other regulatory bodies
- Developed a framework to measure turnaround times for investigating and resolving complaints

Steps to be Completed

- RHRA will set baselines for complaints metrics and subsequently will review and monitor performance against the target on an annual basis.

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #19</b>  | To more clearly and effectively communicate information about retirement home complaints to existing and future residents and family members, and to improve the effectiveness of retirement home inspection choices by inspectors, we recommend that the Retirement Homes Regulatory Authority: | <b>Status</b>     |
|--|--|-------------------|
| Action Items   | <ul style="list-style-type: none"> <li>publish data publicly and regularly on common complaint areas raised by consumers about the retirement home industry;</li> </ul>  | In progress       |
|  | <ul style="list-style-type: none"> <li>publish the nature and quantity of complaints filed with the Authority for each retirement home on the Authority’s website while respecting the privacy of the complainant;</li> </ul>  | Not yet initiated |
|  | <ul style="list-style-type: none"> <li>analyze complaint trends to identify significant areas of focus and to better inform its selection of retirement homes for routine inspections; and</li> </ul>  | In progress       |
|  | <ul style="list-style-type: none"> <li>establish a training module for the retirement home sector and update training for its inspectors based on the most frequent and significant complaints raised to identify areas of focus for inspections.</li> </ul>                                     | In progress       |
| <b>Target Completion Date – Winter 2022<br/>Updated to – Winter 2024</b> |  |                   |

Steps Taken

- Completed complaints analysis
- Assessed routine inspection process and inspector training, taking into consideration common complaint areas

Steps to be Completed

- Consider increased transparency regarding the nature and quantity of complaints for each home in the development of enhanced inspection reports and the report card.

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #21</b>   | To better inform and protect consumers when purchasing accommodation and care services from retirement homes, we recommend that the Retirement Homes Regulatory Authority | <b>Status</b>     |
|---|---|-------------------|
| Action Items  | <ul style="list-style-type: none"> <li>accelerate its efforts to develop a public report card for each retirement home.</li> </ul>  | Not yet initiated |
| <b>Target Completion Date – Winter 2023<br/>Updated to – Winter 2024</b>  |   |                   |
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Included public report card development in its 2021/2022 business plan</li> </ul> <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>Further work will be reported in future quarters</li> </ul> |   |                   |

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #24</b> | <b>To improve the safety and protection of retirement home residents and to support the work and effectiveness of the Risk Officer, we recommend that the Retirement Homes Regulatory Authority:</b> | <b>Status</b>     |
|---------------------------|--|-------------------|
| Action Items              | <ul style="list-style-type: none"> <li>• establish targeted time frames to phase in the Risk Officer’s recommendations;</li> </ul>   | Fully Implemented |
|                           | <ul style="list-style-type: none"> <li>• track the enactment of these recommendations; and</li> </ul>  | Fully Implemented |
|                           | <ul style="list-style-type: none"> <li>• report this information to the Board of Directors and to the Ministry for Seniors and Accessibility semi-annually.</li> </ul>                               | Fully Implemented |

**Target Completion Date – Winter 2021**

Steps Taken

- Proceeded with previously identified plans to develop and implement time frames to phase in recommendations from the Risk Officer
- Tracking implementation of the Risk Officer’s recommendations
- Began distinct reporting of this information to the Board of Directors at semi-annual meetings
- Submitted status update on the implementation of the Risk Officer’s recommendations to MSA

Steps to be Completed

- No outstanding action items

**RHRA Implementation Plan on the Auditor General of Ontario’s Value for Money Audit Recommendations – December 31, 2021**

| <b>Recommendation #26</b> | To collect sufficient fees to cover the Retirement Homes Regulatory Authority’s mandated activities to protect current and former retirement home residents, we recommend that the Retirement Homes Regulatory Authority            | <b>Status</b> |
|---------------------------|---|---------------|
| Action Items              | <ul style="list-style-type: none"> <li>annually reassess the appropriateness of its fees or identify other revenue sources to cover its operating expenses in performing more inspections and other mandated activities.</li> </ul> | In progress   |

**Target Completion Date – Winter 2021  
Updated to – Winter 2022**

|   |
|---|
| <p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <li>Obtained Board approval of the business and financial recovery plan and 2021-2022 budget</li> <li>Worked with government to secure funding in alignment with a recovery plan</li> <li>Conducted stakeholder consultations on 2022 fee schedule</li> <li>Continued evaluation of financial need for future sustainability for 2023</li> </ul> |
| <p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <li>Identify and evaluate alternative revenue source options to cover operating expenses for regulatory oversight and to support longer-term sustainability</li> </ul>   |

**Legend:**

|                          |   |
|--------------------------|---|
| <b>Not yet initiated</b> | Action not yet underway                                     |
| <b>In Progress</b>       | Action is under way, but more action is needed              |
| <b>Fully Implemented</b> | Actions have been taken to fully address the recommendation |