

2024 ANNUAL INFORMATION RETURN

Questions & Answers

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The Annual Information Return (AIR)

Q: What is AIR?

Answer: AIR is a new approach RHRA will use to gather information required directly from retirement homes. AIR would allow RHRA to collect information from all retirement homes at the same time, reduce administrative burden on homes and the number of interactions with homes. It will also inform regulatory activities so RHRA can continue to enhance resident protection and apply right touch regulation. Many regulators in Ontario already use a similar process to collect information annually to support their regulatory activities.

Q: When will AIR begin? When will retirement homes be asked to complete AIR?

Answer: AIR will be an annual process, starting in 2024. RHRA launched the first AIR process on February 1, 2024, at the same time as fee invoices were issued to retirement homes. Submission of the AIR is due on April 1, 2024, at the same time as fees. Retirement homes will have approximately 60 days (2 months) to complete the AIR and RHRA staff are prepared to help with the process.

Q: Who should complete the AIR?

Answer: RHRA will send the AIR to the Licensee and home operations manager contact information on file. The Licensee is responsible for ensuring that the AIR is completed accurately and on time. It is the Licensee's responsibility to determine who will complete the AIR.

Q: Is AIR a one-time process?

Answer: No, AIR will be an annual process. It will take place every year at the same time, when retirement homes pay their annual fees to RHRA (by April 1 every year).

Q: Is it mandatory for all retirement homes to complete AIR?

Answer: Yes, all retirement homes will be required to complete the AIR. RHRA has the authority to request information from retirement homes according to section 108 of the *Retirement Homes Act, 2010* and as per the [RHRA Request for Information Policy](#) approved by the Minister for Seniors and Accessibility.

Q: What if I have already provided some of this information to RHRA in a different format, such as a Notice of Change or directly to an inspector? Do I need to complete this in the AIR again?

Answer: Completion of AIR does not constitute a Notice of Change. RHRA must be notified of any change in the information published in the Retirement Home Database. Please refer to the information about submitting a Notice of Change form on our website.

<https://www.rhra.ca/en/applying-for-a-licence/after-you-apply/>

Q: What are the consequences for Licensees and operators if they do not complete the AIR?

Answer: All licensed retirement homes are required to complete the AIR, as per s. 108 of the Retirement Homes Act. While RHRA has the authority to take action our plan is to offer support through this new process.

Q: Will my responses affect our inspections or other RHRA processes?

Answer: No, the information submitted through AIR will not affect inspections or other regulatory obligations or processes.

Q: How will RHRA use the AIR to reduce administrative burden on retirement homes? Wound't AIR create administrative burden as a new regulatory requirement?

Answer: RHRA acknowledges that AIR itself as a new process will create some administrative work for retirement homes and that it will vary across homes. Homes will experience burden reduction after the AIR process, as in the longer-term AIR will reduce the number of regulatory touchpoints between RHRA and retirement homes. Over time, RHRA will use AIR to reconcile information that may currently be collected through ad-hoc requests. AIR will take place once a year, at the same time as fee invoices, thus streamlining and combining processes.

RHRA has attempted to minimize administrative burden where possible by:

- including only four topics in the 2024 AIR;
- designing the questions to minimize efforts for homes;
- providing homes two months to submit responses;
- making the questions available on RHRA's website so homes can prepare responses before completing the AIR;
- providing support and flexibility to homes that need help answering the questions;

- communicating expectations to retirement homes; and
- in future years, streamlining the AIR process through secure digital interactions between RHRA and retirement homes through RHRA’s new information technology infrastructure and licensee portal.

RHRA is committed to exploring ways to limit any administrative burden on homes for future rounds of AIR, while balancing the need to collect information to inform regulatory activities. Each year, questions will be reviewed and adjusted based on lessons learned from previous years. RHRA will consider whether information collected in previous years is still needed, and whether different information may be needed given the evolving sector and resident needs. In addition to reviewing and updating the information sought and the questions, RHRA will aim to improve the process to minimize administrative burden on homes and to make a new and secure portal available to licensees for completing and submitting the information in the future.

Q: Has RHRA explored alternative sources of the information sought through AIR?

Answer: RHRA has reached out to other organizations to confirm whether the information sought is available through alternative sources. There is limited sector-wide research and information about retirement homes and their residents. For the information RHRA requires, the only efficient way to gather the information is to engage with retirement homes directly. The AIR is an efficient way to gather the information from all retirement homes at the same time and limit the number of touchpoints between RHRA and retirement homes.

Public Consultations/Stakeholder Engagement and Future Years

Q: Did RHRA consult with retirement homes and stakeholders on the new AIR process and questions?

Answer: Yes, RHRA sought public feedback on AIR and the proposed topics for the 2024 AIR in Fall 2023. In addition to written submissions, during the public consultation period RHRA held two Focus Groups with retirement homes. RHRA also sought feedback from key stakeholders before and during the public consultation period, including from RHRA’s Stakeholder Advisory Council, associations representing retirement homes, the Ministry for Seniors and Accessibility’s Retirement Homes Technical Advisory Table, and organizations representing seniors and/or retirement home residents. The consultation materials, and a summary of the consultation feedback and how RHRA has incorporated the feedback is available on the [RHRA Consultation site](#).

Q: What changes did RHRA make to the 2024 AIR process and questions as a result of the consultation?

Answer: RHRA consulted on five proposed topics for the 2024 AIR questions. Most feedback was received on the proposed question regarding “number of shared suites”. Feedback focused on the challenge in obtaining consistent information across all homes, RHRA potentially duplicating efforts of other public health entities if information is used for public health purposes, concerns with whether the information will provide the desired insights, and suggestions for alternative questions. RHRA has considered this feedback and has determined

that the best course of action is to remove this question from the 2024 AIR. As a result, the final 2024 AIR contains questions only on five topics.

RHRA also received helpful feedback on how to clarify the process and support retirement homes to complete the AIR. Feedback was also provided in relation to specific wording of the questions to make them clearer. RHRA has incorporated much of this feedback in the revised 2024 AIR. Feedback that could not be incorporated in the 2024 AIR will be considered as RHRA prepares for future years.

Please visit the [RHRA Consultation site](#) for the detailed summary of the consultation feedback and how RHRA has incorporated the feedback.

Q: How will RHRA receive feedback on the AIR process in future years?

Answer: The 2024 AIR includes a voluntary “comments about the 2024 AIR process” text box. RHRA will review the feedback as it prepares for the next year’s process.

In future years, RHRA will annually review and adjust the questions based on lessons learned from previous years and with the goal of balancing the need to collect information with administrative burden on homes. RHRA will establish a process for stakeholders to suggest revisions for future years while keeping the process streamlined. RHRA will begin engaging with stakeholders in summer/fall 2024 for input into the 2025 AIR.

Q: In future years, will RHRA collect the same information?

Answer: AIR is meant to give RHRA relevant information to regulate the sector. Each year there will likely be changes based on lessons learned from previous years and RHRA’s needs at the time. For example, there may be questions that are no longer required each year. We aim to improve the process to minimize the administrative burden on homes.

Use of Information Collected through AIR

Q: How will RHRA use the information collected?

Answer: RHRA would use the information collected to inform its work in support of its mandate, including providing policy advice to Government. Some of the information would have a direct impact on RHRA’s regulatory activities and some would provide RHRA with a more complete and systematic understanding of the retirement homes sector as it continues to enhance resident protection and apply right touch regulation.

Q: Will RHRA share the information with anyone else?

Answer: For learning and improvement purposes, RHRA intends to share sector-wide, non-identifiable, statistical information with stakeholders, including retirement homes, as appropriate.

RHRA will not share information about individual homes or for each chain. Only sector-wide, non-identifiable, non-proprietary information will be shared.

Q: Will RHRA use the information to provide advice on changes to regulatory requirements?

Answer: RHRA will use insights from the AIR to inform its work and advice to Government. RHRA will share sector-wide, non-identifiable information with Government and key stakeholders, who may use the information in their own activities.

Q: How will RHRA protect the privacy of the information?

Answer: RHRA is committed to protecting confidential information it receives from retirement homes in conducting its business operations and performing its regulatory functions. RHRA will comply with its statutory obligations under the *Retirement Homes Act, 2010* and regulation made under the Act, all other applicable legislation and with its [Information Access and Privacy Code](#).

Q: The information collected through AIR in 2024 is only a point-in-time information. Is that useful?

Answer: RHRA understands that the AIR would provide “point-in-time” information that is likely to change between reporting periods. RHRA would use the information as a general guide only. When warranted in specific situations, RHRA staff may reach out to a home to gather or verify current information.

2024 AIR Logistics

Q: How will retirement homes receive RHRA’s request to complete the 2024 AIR?

Answer: On February 1, 2024, RHRA sent an email to licensees and operations managers with the link to the AIR and instructions. If a licensee has not received the emails, please contact info@rhra.ca or 1-855-ASK-RHRA.

The AIR is available to all retirement homes at the following online link. The link is not unique and anyone can access it to complete the AIR. Only one AIR should be completed for each retirement home.

<https://analytics-ca.clickdimensions.com/cn/acauo/RHRA2024AnnualInfoReturn>

Q: How much time will retirement homes have to complete the 2024 AIR?

Answer: Retirement Homes will have 60 days to complete the 2024 AIR: February 1, 2024 to April 1, 2024.

Q: How long will it take a retirement home to complete the 2024 AIR?

Answer: RHRA has designed the questions to minimize administrative burden on homes. The exact completion time will depend on each home’s individual circumstances. The duration is tied to two main factors: whether the home has programs funded by other organizations and whether the home is part of a chain. Homes that have programs funded by other organizations would be asked to complete additional questions about each of the programs. Homes that are part of a chain of homes may need to seek information from the corporate office.

Q: How much work is required to complete the 2024 AIR?

Answer: RHRA has designed the questions to minimize the amount of time and effort required to answer the questions, without the need to collect new information. We anticipate that in most cases the Licensee or operator who completes the AIR will already have the information easily available.

Q: Can I save a partially completed AIR and come back to it later to complete and submit?

Answer: No, the AIR form must be completed and submitted in one seating. The software RHRA will use for AIR does not have the ability to save partially completed responses. A non-fillable, printable sample of the AIR with the questions is available [here](#). We will continue to explore ways to improve functionality in future years so that the process is streamlined.

Q: Can the home review the AIR questions before completing the AIR?

Answer: A non-fillable, printable version of the 2024 AIR is available [here](#) and was sent in the email sent on February 1, 2024. We encourage Licensees and Operations Managers to review the questions in advance of completing the AIR. Operations Managers in chain homes may need to coordinate the home's response to some questions with their head office.

Q: Why is RHRA not using the new Licensees' portal for the AIR?

Answer: RHRA is committed to exploring ways to integrate various processes and to minimize administrative burden on retirement homes where possible. RHRA pilot tested the portal with licensees and is in the process of making some changes to address their feedback. RHRA intends to launch a new secure licensee portal later in 2024. RHRA's intent over the long term is to streamline interactions with retirement homes through the portal. In future years, retirement homes will be able to complete their AIR and pay their fees together. The portal will be launched in phases so that RHRA can support retirement homes during the transition period.

Q&As About the 2024 AIR Questions

A non-fillable, printable version of the 2024 AIR is available [here](#).

Identification Questions

Q: Will the identification information be pre-populated?

Answer: No, the AIR will not have pre-populated fields. The software does not have the ability to generate pre-populated fields. The person completing the AIR on behalf of the home will be required to provide the home's name and license number, as well as the person's name and role.

Use of electronic documentation systems

Q: What is considered "an electronic system" for this question?

Answer: For this question, an electronic system is any software or online platform that helps the retirement home save information about the residents. RHRA does not endorse any particular electronic system, nor would we dictate the type of systems homes should use. Examples of electronic systems include PointClickCare and Yardi.

Q: Why is RHRA not seeking information about the specific electronic systems that are being used?

Answer: For the 2024 AIR, RHRA aims to gather baseline information only about whether electronic documentation systems are common across retirement homes. This question was designed to be easily completed by retirement homes to minimize administrative burden.

In future years, RHRA will evaluate the information collected through the 2024 AIR and consider whether this baseline information is valuable for RHRA's purposes, or whether different information may be required about the electronic documentation systems used by retirement homes.

Q: Why is RHRA asking specifically about medication administration, plans of care and progress notes?

Answer: These are the areas where homes may be using electronic systems and based on RHRA's data and observations, where there is a high number of citations for non-compliance with regulatory requirements. This information will help RHRA determine the ability of homes to provide information to RHRA related to these three areas.

Q: Does RHRA plan to collect resident data from our electronic systems?

Answer: No, there are no plans to access resident data from the electronic systems outside of RHRA's current inspection processes.

Q: Does RHRA have plans to connect its new retirement homes online portal with the homes' electronic systems?

Answer: There are no plans to have direct linkages between the homes' electronic systems and RHRA's online portal.

Q: Will RHRA share this information broadly or use it for commercial purposes?

Answer: RHRA will share only de-identified information with key stakeholders (e.g., sector-wide information). We will not share information about individual homes or each chain. We will not use this information for commercial purposes.

Extra Expense Insurance (EEI)

Q: Why is RHRA changing the process for EEI?

Answer: RHRA is changing the process to reduce the number of regulatory touchpoints with homes while ensuring that homes meet the regulatory requirements. It remains a requirement for Licensees to have valid extra expense insurance coverage at all times.

Q: How will the EEI process change?

Answer: Currently, RHRA requires all homes to manually submit their actual EEI policy certificates at renewal. The time of renewal varies from home to home. Automated reminder messages are sent throughout the year to retirement homes 15 days prior to the expiry date of

an EEI certificate, on the day of expiry and 21 days after expiry. RHRA staff manually follow-up with homes where a current EEI certificate is not received. This results in numerous interactions/follow up.

Starting with the 2024 AIR, RHRA will use the AIR to collect select EEI certificate information from all homes once a year, at a predictable time. Homes would not be required to submit their actual EEI policy certificates as part of AIR. RHRA may follow up with homes to validate the information.

Q: Will I continue to receive email reminders from RHRA around the time of my EEI policy renewal date?

Answer: No, RHRA is replacing the email reminders with the annual AIR process. A small random set of homes will be contacted by RHRA and asked to submit their EEI policy certificate for verification.

Q: How do I submit my EEI certificate to RHRA going forward?

Answer: Most retirement homes will not be required to submit their EEI certificate to RHRA. Only a small set of homes will be asked to submit their EEI policy certificates to RHRA. RHRA will contact a small random set of homes directly to request the certificate. If you are not contacted by RHRA, you do not need to submit your certificate.

Q: What if my EEI policy expires before the next AIR in 2025? Do I need to notify RHRA and submit my new certificate?

Answer: No, you do not need to notify RHRA or submit your new certificate. Please wait until the 2025 AIR or a specific request from the RHRA to provide your updated information.

Q: My home is covered under the EEI policy of a chain of homes, and I do not know the details of the EEI policy. Could the corporate office of the chain complete this question?

Answer: It is the responsibility of the Licensee or operator to ensure that the person completing the AIR for the home has the information required to answer all questions. If the home does not have the EEI policy information, they should contact their corporate head office to obtain the information prior to completing AIR.

Q: My EEI policy is included as part of a bigger insurance policy. Do I provide the limit of the total policy or just the EEI policy?

Answer: Please provide the limit for the EEI policy only.

Q: How will RHRA determine which retirement homes will be audited?

Answer: RHRA will use a random sampling methodology to select a small random set of homes for audit.

Q: What if I am not able to obtain or afford EEI?

Answer: EEI is a requirement for all licensed retirement homes. Please contact the RHRA to discuss your individual situation.

Programs Funded by Other Organizations and Alternate Level of Care Residents

Q: How will the requested information help RHRA's regulatory activities?

Answer: Information about programs in retirement homes and Alternate Level of Care residents will support RHRA's regulatory activities in a number of ways, including enabling RHRA to:

- Determine which retirement homes have programs funded by other organizations and whether these programs are exempt from RHRA's authority.
- Inform ways RHRA can reduce burden on homes during inspections and other regulatory activities.
- Advise residents, families and staff who to contact if they have concerns with programs where residents are exempt from RHRA's authority.
- Enhance RHRA's understanding of the role of retirement homes in providing accommodation and services to seniors under various programs.
- Share information about these programs with government and community partners.
- Respond to the recommendations in the [2020 Auditor General's Value-For-Money Audit of the RHRA](#) based on current information from all retirement homes.

Q: How will RHRA confirm whether residents in programs funded by other organizations are exempt from RHRA's authority?

Answer: For the 2024 AIR, RHRA's goal is to gather high-level information from all retirement homes about programs funded by other organizations. This will provide a provincial sector-wide snapshot about such programs. We recognize that the information will be a "point-in-time" and may change.

Over time, RHRA staff may follow-up with the retirement homes who have indicated that they have subsidized programs to try and gather additional information and determine whether the programs are exempt.

Q: Is this question about care provided by external care providers, such as home care workers from Home and Community Care Support Services, paid for directly by the resident or their family, or a family member providing services to the resident?

Answer: No, RHRA does not intend to collect information about external care providers through the 2024 AIR.

These questions are only about programs where another organization (such as a hospital, Home and Community Support Services, a provincial or federal ministry, Ontario Health, municipality etc.) pays to the retirement home to provide accommodation and/or care services for residents.

Q: Retirement homes that have these programs would spend extra time to complete their AIR. Why is RHRA creating this additional administrative burden on homes?

Answer: RHRA acknowledges the variety and complexity of programs in retirement homes funded by third-party providers. RHRA is seeking information on such programs to clarify its authority for the residents in these programs. In addition, the information will help RHRA respond to recommendations related to subsidized residents and residents who were Alternate

Level of Care hospital patients in the *2020 Auditor General's Value-for-Money Audit of the RHRA*.

RHRA has worked with the Ontario Government and provincial and local partner organizations to gather information about such programs. This is an ongoing challenge, and the AIR process will be used as another mechanism to gather information directly from retirement homes. The information RHRA collects through AIR will help reduce administrative burden on retirement homes with such programs during inspections and from other regulatory activities.

RHRA has designed the questions to make it as easy as possible for retirement homes to provide the information and to add additional clarification for their programs if needed.

Q: Our retirement home is part of a chain. The programs funded by other organizations are managed by the corporate head office of the chain and the retirement home staff do not have the information. Could RHRA seek this information directly from the corporate head office?

Answer: It is the responsibility of the Licensee or operator to ensure that the person completing the AIR for the home has the information required to answer all questions. If the home does not have the requested information, they should contact their corporate head office to obtain the information prior to completing AIR.

Q: We may not be able to provide the official name of the program or the name of the funding organization. Can we skip this question?

Answer: RHRA understands that some homes may not have specific information about the current programs, for example when the program has been in place in the home for several years. Homes should check the information in the original contract between the home and the funding organization and provide that information, even if that information may be outdated. Homes will not be able to skip the questions.

Q: Should the home be asking residents about whether they are subsidized or funded through a program?

Answer: No, homes should not ask residents to report if they are subsidized or funded. RHRA is seeking information about contracts that the retirement home has directly with the funding organization. Homes should check the information in the original contract between the home and the funding organization and provide that information, even if that information may be outdated.

Q4: My home has a program funded by another organization. The number of residents and the number of suites under the program are different. Should I report the number of residents or the number of suites?

Answer: Please report the number of residents funded under the program. If the number of residents changes over time, please provide the number of residents in the program on the date when you complete AIR. RHRA's goal is to keep the information collected as streamlined as possible.

Q: Our home has one of the programs listed, and we have care services for these residents provided by agency staff. How do we answer the question “Are the care services delivered to the residents in the program provided by the retirement home?”

Answer: You should answer “Yes” to this question if the care service is provided either directly or indirectly by the home.

Q: How do we request that suites exempted under RHRA’s authority are also exempted from RHRA fees?

Answer: If you believe that a program in your retirement home funded by another organization falls under an exemption in the *Retirement Homes Act, 2010*, and is not currently excluded from fees, please contact RHRA at info@rhra.ca or 1-855-ASK-RHRA (1-855-275-7472). We will provide further information about the documentation we require to consider your request to exempt suites.

Retirement Homes located on premises with other facilities

Q: What is considered as “same premises” for this question?

Answer: RHRA is looking to gather information about facilities that are in the same building or next to each other. This would include facilities within the same “campus of care”. We are looking to identify retirement homes where residents could move from one facility to another within the same premises, thus allowing the resident to age in place and/or minimize disruption.

Q: What if the retirement home does not have information about other facilities?

Answer: Please respond to the best of your knowledge.

Q: Should we provide information about adult day programs, convalescent care programs, respite care programs or other short-term programs?

Answer: No. This question is focused on facilities that provide long-term accommodation with overnight stay.

For Further Information and Support to Complete AIR

Retirement homes who have questions or require support in completing their 2024 AIR could contact RHRA at info@rhra.ca or 1-855-ASK-RHRA.