

What to Expect During a Routine Inspection

Information for Retirement Homes Licensees and Operators

The information below describes what licensed retirement homes can expect during the RHRA's routine inspection process. As always, RHRA is open to your feedback on our inspection process.

Process Step	What to Expect
Before the routine inspection	<p>Consistent with RHRA's regulatory modernization initiative to place greater emphasis on assessing the implementation of important policies and strategies in retirement homes, all routine inspections are unannounced.</p> <p>Please ensure the following documents are kept up to date:</p> <ul style="list-style-type: none"> • 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 • Emergency Plan testing/evacuation records and current arrangements
On the day of the inspection	<p>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.</p> <p>At the start of the inspection, the Inspector will meet with designated staff at the home to explain:</p> <ul style="list-style-type: none"> • The scope and purpose of the inspection. • How the findings will be communicated to the home. • The review of the current information for the home on the RHRA's Retirement Home Database <p>Additionally, the inspector will be requesting:</p> <ul style="list-style-type: none"> • 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.

Process Step	What to Expect
	<ul style="list-style-type: none"> Medication Administration Records and corresponding physician orders for a selection of residents.
During the inspection	<p>The Inspector will carry out the inspection in accordance with the updated inspection model.</p> <p>The Inspector may:</p> <ul style="list-style-type: none"> Walk through the home with you to observe residents engaged in the activities of their daily lives. Speak to residents and staff in the home. These conversations may be done privately to ensure confidentiality is respected. Observe operations in the home including care services provided to residents, i.e., meals, ambulation and medication administration. Review documents such as Plans of Care, complaint logs, falls logs and any other documents needed to verify compliance based on observations in the home. Ask follow-up questions concerning the walk-through, observations or the document review. <p>Note that during routine inspections, the Inspector may also look into issues relating to a Mandatory Report or a formal complaint the RHRA has received, and follow-up with previously identified areas of non-compliance.</p>
At the end of the inspection	<p>The Inspector will meet with you and provide feedback on findings of non-compliance resulting in a citing. The debriefing may also include areas that are not being cited but need to be reviewed and rectified and will be verified during future inspections or best practice suggestions. During the debrief, homes encouraged to actively participate and take notes. Homes can produce evidence demonstrating compliance or in support of achieving compliance which will be taken into consideration by the Inspector.</p> <p>Please note the debrief may not occur on the day of the inspection. In addition:</p> <ul style="list-style-type: none"> A Draft Inspection Report will be sent to your home. You will be provided the opportunity to detail the steps being taken to come into compliance or submit evidence supporting that compliance has been achieved. If a home disagrees with a citation, the draft process is an opportunity to inform the inspector, outline why and request the inspector have a manager review the finding prior to the final inspection report being issued.

Process Step	What to Expect
	<ul style="list-style-type: none"> An Inspector may contact you after the inspection process is finalized to determine if you have fulfilled your obligation to come into compliance.
Final Inspection Report	<p>The RHRA will send you the Final Inspection Report. It will also be provided to your home's Residents' Council, if applicable. Any information previously submitted by you in response to the Draft Inspection Report will be reviewed and taken into consideration by the Inspector when preparing the Final Report.</p> <ul style="list-style-type: none"> Note that a Final Report identifying that corrective action was taken does not constitute RHRA approval or endorsement of any documents submitted as part of your response to the Draft Inspection Report, nor any finding of compliance or non-compliance with the Act with respect to those documents. If a response submitted by you indicates ongoing or forthcoming corrective action, the RHRA expects that you will fulfill that action. You are then responsible for informing the RHRA upon its completion, following the issuance of the Final Report. RHRA Inspectors may follow up on any corrective action in the future to verify compliance.

Additional Information

RHRA continues to improve its oversight approach to focus its inspections on areas of greatest risk of harm to residents 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 RHRA to dedicate its resources where they are most needed.

Licensees are encouraged to use routine inspections as an opportunity to raise any questions they have concerning compliance with the *Retirement Homes Act, 2010* (the Act). Inspectors will take time to explain requirements and best practices for compliance.

The Act requires an inspection of every retirement home at least once every three years but RHRA will inspect more frequently as required, for example, if there is a risk in the home.

- RHRA Inspectors will not inspect everything outlined in the legislation during the inspection. The inspection may include follow-up on areas of previous non-compliance.
- Inspectors will focus on the home's implementation of practices relating to resident welfare including, but not limited to:
 - Emergency plans
 - Infection prevention and control
 - Resident records
 - Behaviour management
 - Falls strategy
 - Abuse and neglect

- Staff training and qualifications
- Administration and storage of drugs
- Complaint handling

Each routine inspection will look different as the inspection is influenced by the home's previous non-compliance findings, as well as observations made during the routine inspection. Inspectors will focus on an evaluation of whether the home has effectively implemented policies and practices to protect the welfare of residents. This includes speaking with staff and residents, and reviewing documents supporting that the home has taken the necessary actions when dealing with incidents or complaints.

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).

Retirement home operators should have their records well-organized and in an accessible location. This is to ensure they are available for the RHRA Inspectors, and also to ensure 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. When inspectors are onsite and need access to electronic health records, RHRA strongly suggests that homes not provide or use the credentials of a home's manager or staff. Rather, it would be better if a guest access or inspector account could be created when they are onsite. This access should not have firewalls that would restrict an inspector's ability to view records. Compliance and/or enforcement actions may follow inspection findings of significant or repeated non-compliance. The RHRA may also suggest that homes participate in its Compliance Support Program.

Additional resources are available in the Licensees and Operators section of the RHRA website at rhra.ca. The website also includes information about the [Retirement Homes Act, 2010 and Regulation](#), a [Plain Language Guide to the Act](#), and [Compliance Assistance Modules](#).