2025 ANNUAL INFORMATION RETURN

Questions & Answers

The Annual Information Return (AIR)

Q: What is AIR?
Answer: Launched early in 2024, AIR is a new approach RHRA is using to gather information directly from retirement home operators to better understand the sector and resident needs. AIR is an annual process and takes place when retirement homes pay their annual fees to RHRA (by April 1 every year).

The AIR also helps the RHRA to apply a right-touch regulatory approach that is targeted, proportionate and considers the operational aspects of retirement homes. The AIR involves a streamlined, structured process to collect information from all retirement homes.

Q: How will RHRA use the information collected?
Answer: RHRA will use the information collected through AIR to continue to inform its work in support of its mandate, including providing information about retirement homes and advising the Minister on policy matters relating to retirement homes. 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: What is Right Touch Regulation?
Answer: Right touch regulation is an evolution of RHRA's regulatory approach whereby regulatory actions and expectations are commensurate with the risk involved and considers the operational aspects of retirement homes. It encompasses RHRA's proactive approach to regulating, enabling the RHRA to have more of a proportionate, flexible, and responsive regulatory model to enhance resident protection and support innovation and growth across the sector. Currently, RHRA is gathering additional data across the sector (including through AIR) to identify targeted next steps, as part of RHRA's right touch regulation approach.

Q: Will RHRA share the information collected through AIR?
For improvement purposes, RHRA intends to continue to share sector-wide, non-identifiable, statistical information with stakeholders, including retirement homes. Specific information may be shared with government partners. For reference, findings from the outcomes of AIR 2024 are available here.

RHRA is committed to protecting the confidential information it receives from retirement homes in conducting its business operations and performing its regulatory functions. This may

include information RHRA receives through AIR. RHRA will comply with its statutory obligations under the *Retirement Homes Act, 2010* and regulations under the Act, all other applicable legislation, and with its Information Access and Privacy Code.

Q: Is it mandatory for all retirement homes to complete AIR?
Answer: All retirement homes will be required to complete the AIR. It is a common practice for regulators to collect information annually about and from their licensees/registrants. RHRA has the authority to request information from retirement homes in accordance with section 108 of the *Retirement Homes Act, 2010* and as per the *RHRA Request for Information Policy*.

Q: When will retirement homes be asked to begin and complete AIR?
Answer: The AIR process remains the same as 2024 and respondents are asked to complete AIR at the same time as 2025 fee invoices are issued to retirement homes. The 2025 AIR process will be launched on February 3, 2025, and submissions of AIR will be due at the same time as fees (on April 1, 2025). Retirement homes will have approximately 60 days (2 months) to complete the AIR and RHRA staff will be available to assist and answer questions.

Q: How will RHRA use the AIR to reduce the administrative impact on retirement homes?
Answer: RHRA acknowledges that AIR itself is a newer process and will create some initial administrative work for retirement homes, which may vary across homes. RHRA aims to balance minimizing the administrative work for operators, while also filling in information gaps and insights that will lead to improving right touch regulation for the sector.

The request for information, through AIR, has been designed to minimize any additional administrative requirements and aims to consider the variability in the ability of homes to respond to RHRA's information requests. RHRA has attempted to minimize the administrative impact where possible by:

- including only a few questions in the 2025 AIR;
- designing the questions to minimize efforts for homes;
- providing homes two months to submit responses;
- communicating expectations to retirement homes;
- providing support to complete AIR, as required; and
- streamlining the AIR process at the same time as fee invoices.

RHRA is committed to exploring ways to limit administrative work on homes for future rounds of AIR, while balancing the need to collect information to inform regulatory activities. For example, prior to AIR 2024, RHRA required all homes to manually submit their Extra Expense Insurance (EEI) policy certificates at the time of policy renewal, which varied from home to home and often led to multiple interactions between RHRA and the home. In 2025, homes will input policy information directly into AIR, reducing administrative work. RHRA will aim to improve the process with each question reviewed and adjusted, based on lessons learned from previous years.

Public Consultations/Stakeholder Engagement

Q: Did RHRA consult with retirement homes and stakeholders on the new AIR process and questions?
Answer: RHRA sought public feedback on AIR and the proposed topics for the 2025 AIR in Summer/Fall 2024. In addition to written submissions, RHRA sought feedback from key stakeholders before and during the public consultation period, including from RHRA's Stakeholder Advisory Council, an association representing personal support workers, the Ministry for Seniors and Accessibility's Retirement Homes Technical Advisory Table, Behavioural Supports Ontario, and organizations representing seniors and/or retirement home residents. The consultation materials and a summary of the consultation feedback on how RHRA has incorporated the feedback are available on the RHRA Consultation site.

Q: What changes did RHRA make to the 2025 AIR process and questions as a result of the consultation?
Answer: RHRA consulted on eight proposed questions for the 2025 AIR questions. Most of the feedback received focused on clarification of terms, the challenge in obtaining consistent information across all homes, suggestions for additional questions, AIR potentially increasing administrative work, and questions about the desired insights for collecting the information. RHRA has incorporated much of this feedback in the revised 2025 AIR. Feedback that could not be incorporated in the 2025 AIR will be considered as RHRA prepares for future years.

Please visit the RHRA Consultation site for a 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: Stakeholder engagement and collaboration are important elements of RHRA's Strategic Plan and contribute to better outcomes. RHRA will explore opportunities for engagement during the AIR 2026 stakeholder consultation feedback period and in future years. RHRA will continue to work with the sector and engage with stakeholders in the process of future AIRs, while keeping it as streamlined as possible. RHRA will begin engaging with stakeholders in the summer/fall of 2025 for input into the 2026 AIR.

For Further Information and Support to Complete AIR

Retirement homes who have questions or require support in completing their 2025 AIR should contact RHRA at info@rhra.ca or 1-855-ASK-RHRA.