RHRA Retirement Homes Regulatory Authority

Annual Report

Fiscal Year 2024/2025

April 1, 2024 to March 31, 2025

Vision

Seniors living with dignity, choice and confidence in licensed retirement homes.

Mission

The RHRA works collaboratively with the sector and stakeholders to protect Ontario retirement home residents through effective right-touch regulation.

To fulfill its mission, the RHRA:

- Uses data, evidence and analysis to support a risk-based approach to decision-making.
- Informs, educates and engages current and prospective residents, families, partners and other stakeholders.
- Informs, guides, licenses, inspects and educates retirement homes to help them comply with care standards and regulations.
- Uses all available tools to protect residents, including enforcement.

Values

Excellence

Efficient, effective and continuously improving.

Integrity

Principled, honest and respectful.

Adaptability

Responsive, proactive and innovative.

Accountability

Transparent and responsible actions.



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Corporate Overview

About the RHRA

The Retirement Homes Regulatory Authority (RHRA) is mandated by the Government of Ontario (the Government) to administer Ontario's *Retirement* Homes *Act, 2010*, (the Act) in the public interest. The RHRA's core responsibility is to enhance resident safety and consumer protection in Ontario's licensed retirement homes.

The RHRA is a not-for-profit corporation established as an administrative authority of the Government through the Act and its regulations. The Government retains responsibility for the Act and regulations. The RHRA is responsible for ensuring the legislation and regulations are implemented and enforced.

Scope

The RHRA fulfills its mandate by:

- Informing and educating the retirement home sector, residents, and the public about the Act, regulations and the role of the RHRA.
- Licensing Ontario's 781 retirement homes and maintaining a searchable Retirement Home Database of licensed retirement homes available on the RHRA's website.
- Inspecting retirement homes, overseeing compliance with the regulations and care standards, and enforcing the Act for the protection of residents.
- Advising the Minister/Ministry for Seniors and Accessibility (MSAA) on emerging trends and policy matters related to retirement homes.

Core services

- Standard Setting
- Licensing
- Public/Resident and Licensee Education and Resource Development
- Inquiries, Complaints and Client Services
- Inspections
- Partnerships and Stakeholder Engagement
- Compliance Support
- Investigations
- Enforcement, Compliance Monitoring and Prosecution
- Data Analytics and Risk Evaluation

Message from the RHRA's Chair of the Board

I am delighted to share our Fiscal Year 2024/25 Annual Report, which showcases our progress in enhancing resident protection across Ontario's licensed retirement homes.

Looking back on the second year of our three-year Strategic Plan, I want to take a moment to consider the meaningful progress the RHRA has achieved.

As we prepare to develop our next Strategic Plan for Fiscal Year 2026/27, and the years to come, we remain deeply committed to engaging with our diverse stakeholders and partners so we can continue to be responsive to their evolving needs and challenges, and strengthen resident protection.

Fiscal prudence and sustainability

Our Board plays a vital role in ensuring the organization has the necessary resources to fulfill its public interest mandate and meet its objectives. As highlighted in this year's report, the RHRA continues to face increasing demand for regulatory oversight. Our Board continues to work closely with and support Management to address the delicate balance between growing demand to respond to concerns while advancing key initiatives that reflect resident needs, the sector's evolution, and the broader regulatory landscape.

One of our key priorities is maintaining financial sustainability, acknowledging that adjustments may be required in response to inflation, external conditions and increasing workloads. We remain committed to supporting the RHRA's resident protection mandate while practicing fiscal prudence and being sensitive to geopolitical and economic realities.

Collaborating with our stakeholders

The organization's progress this year would not have been possible without the ongoing engagement of our many stakeholders. This past year, the RHRA conducted its triennial effectiveness survey with over 500 retirement home residents, as well as licensees, and other key senior, healthcare, industry and government stakeholders. Through this effort, we gained valuable insights into how the RHRA is viewed and its effectiveness, helping us align our understanding with the needs and expectations of those we serve. These findings will be instrumental in the development of our next Strategic Plan.

I also want to extend our Board's appreciation to the many stakeholders who have taken the time and effort to participate in the RHRA's various consultations throughout the year, as well as to those who serve on the organization's more formal channels including the Stakeholder Advisory Council, the Residents' Network and the newly constituted Licensee Engagement Forum. Your input has helped the organization make informed and balanced decisions.

Farewells and new arrivals

Like other organizations, we recognize the importance of having continuity and stability on our Board while appreciating the fresh perspectives that come with change.

On behalf of my colleagues, I extend our heartfelt gratitude to John Groe, who completed his term in December, for his contributions and for his passionate advocacy for accessibility. I also want to warmly welcome Joe Vaccaro to our Board. Joe brings valuable experience across sectors relevant to our work, along with personal insight into the retirement home system, giving him a deep appreciation for the challenges families face.

A special thank you to former Vice-Chair, Barbara Kieley, who recently completed her term in this role and continues to serve as a valued director on our Board. Barbara brings her strategic, thoughtful and pragmatic lens to discussions, helping to embed best practices into our governance structure.

Our congratulations go to Christine Ozimek, who has been elected as our new Vice-Chair. Christine's meticulous attention to detail, strategic mindset and natural curiosity will undoubtedly serve us well while in the role.

We would also like to express our gratitude to Andria Bianchi for fulfilling a three-year tenure as Stakeholder Advisory Council (SAC) Chair. Her substantial contributions included fostering a strong culture of collaboration and dialogue, encouraging meaningful input from all stakeholder viewpoints represented on the Council. We would like to warmly welcome Rose Lamb as the new Chair, effective January 1, 2025, and look forward to working together.

And, of course, a sincere thank you to our dedicated staff, who continue to excel in upholding our mandate while managing increasing demands with exceptional commitment.

Finally, I want to take this opportunity to thank the Honorable Minister Raymond Cho and the Ministry for Seniors and Accessibility staff for their collaboration, confidence in RHRA, and ongoing support. Together, we are laying the foundation for continued success and working to ensure seniors live with safety, dignity and respect in Ontario's licensed retirement homes.

Sincerely,



Alex Yuan
Chair, RHRA Board of Directors

Message from the RHRA's CEO and Registrar

Fiscal Year 2024/25 marked the second year of our three-year Strategic Plan and was defined by substantial progress on key priorities to deliver on our resident protection mandate. These achievements have laid a strong foundation for both the final year of our current strategy and the development of our next Strategic Plan, which will begin in Fiscal Year 2026/27.

Evolving our right-touch regulatory approach

Ontario's licensed retirement home sector supports approximately 60,000 to 70,000 residents who have a wide range of care needs—from fully independent living to advanced care. With as many as 12,000 seniors living in licensed retirement homes on the long-term care waitlist, this underscores the critical role retirement homes play in bridging the gaps across the province's housing and care continuum. As the number of seniors with complex health and care needs grows, Ontario's retirement home sector continues to evolve—and so too must our regulatory approach.

Over the past year, we have conducted extensive research engaging with health care experts, researchers, residents and their families, and the sector to ensure that we have a realistic understanding of how it is evolving. This insight will allow us to take an evidence-based, data-driven approach to regulating retirement homes in a proportionate manner.

Retirement homes serve a diverse population of residents—from those seeking a more social lifestyle with minimal care needs, to those with complex medical conditions who require more support with their care. This wide range means there is no single regulatory approach that works for every home or every situation. It also means that the risks to resident safety and well-being can vary, and so must our approach. That's why we are using a right-touch approach: we monitor early signals of risk, build a clear understanding of the issue through data and input from operators and partners, and then apply a proportionate response tailored to the situation, always focused on resident well-being and supporting homes.

As we continue to evolve this approach, we will work closely with licensees and the sector to provide compliance support, education and resources. Our goals are to clarify regulatory requirements, enhance compliance, and help seniors and their families make informed choices suited to their circumstances and needs.

Building stronger dialogue with the sector to achieve compliance

As a modern and responsive regulator, we recognize that everyone benefits when the RHRA provides proactive support to retirement homes striving to achieve compliance. This year we published the first RHRA *Insight Series*, a resource outlining trends in non-compliance with an initial focus on abuse and neglect, one of the more common areas where we receive complaints and reports of harm/risk of harm. We also developed four new Compliance Assistance Modules to accompany the Insight Series that focus on situation-based learning. Our goal is for retirement home operators and their staff to use these resources, learn about emerging trends in non-compliance and take proactive steps to better prevent abuse and neglect.

To further enhance collaboration and obtain more input from a broader range of licensees, we established our Licensee Engagement Forum. Recruitment will be complete with the inaugural meeting planned for the first quarter of Fiscal Year 2025/26.

These initiatives are part of our broader strategic direction to foster proactive engagement and support licensees as we work toward shared goals of resident protection. We have heard from licensees who welcome this approach, recognizing its value in improving compliance and promoting a deeper understanding of regulatory expectations. While this work requires additional investment of time and resources, it is a worthwhile commitment that enhances the safety and well-being of licensed retirement home residents.

Stakeholder perceptions hold steady

Every three years, the RHRA conducts a comprehensive survey of residents, licensees and other stakeholders to measure their perceptions of our effectiveness. The results of this survey are an important input that factors into improving our operations and our strategic planning work.

Stakeholders continue to recognize the importance of strong oversight and the RHRA's role in enforcing standards and providing clear, reliable information. The feedback also highlights the desire from stakeholders for the RHRA to share its expertise and make information more available. There is broad agreement that higher-risk homes should receive enhanced oversight, though views differ on the overall level of regulation, emphasizing the importance of ongoing dialogue and a balanced approach.

The 2024 Multi-Stakeholder Effectiveness Survey results show that the RHRA's overall Accountability Index Score remains stable at 7.3 out of 10. Perceptions among licensees surveyed increased directionally, while there was a slight dip among residents, which was driven by an increased neutral sentiment rather than negative views. Considering our efforts to spread awareness and engage residents, awareness of the RHRA among residents has grown modestly from 29 per cent in 2021 to 33 per cent in 2024.

Rising demand for oversight and guidance challenges capacity and service standards

We continue to experience sustained and significant increases in regulatory activity for the third consecutive year. Mandatory reports of harm/risk of harm rose by 46 per cent driving a 42 per cent increase in responsive inspections year over year. As a risk-based regulator, we prioritize reports of harm/risk of harm. As a result, while we are meeting our service level standards for immediate responsive inspections, this has placed pressure on our capacity to consistently meet service level standards for proactive routine inspections. To improve these standards and increase our responsiveness, we have invested in additional front-line staff. We realize, however, that further investments will be necessary to keep pace with the sustained demand for regulatory intervention.

Although the total number of complaints received in Fiscal Year 2024/25 remained consistent with the previous year, we closed 13 per cent fewer cases. This decline reflects both the growing complexity of the nature of complaints and the broader strain on the system, including the surge in mandatory reports, a higher volume of responsive inspections, and our continued efforts to address a backlog in routine inspections.

In addition to responding quickly to reports of harm, our inspectors also focus time and resources on tailored education and guidance in cases where there are opportunities to strengthen licensee practices through tailored guidance and support, while maintaining resident safety and protection as the highest priority. We've also continued to dedicate resources to proactive compliance support so that licensees can continue to comply with regulatory standards that inspire public and resident confidence.

Managing financial pressures while investing in front-line capacity

Sustained increases in regulatory activity, coupled with inflationary fee adjustments since 2023, have created growing pressures on our capacity and service levels. To support short-term improvements in service standards, our Board chose to invest in front-line resources for Fiscal Year 2024/25. As a result, operating expenses exceeded revenue from licensee fees and other sources, leading to a $585K deficit.

This shortfall was offset by $930K in net investment income, largely due to favorable market conditions, though such conditions are inherently uncertain and cannot be relied upon as a consistent funding source. The deficit was further mitigated by a 2.2 per cent growth in retirement home suites, reflecting a stronger-than-expected rebound in the sector. While new growth is positive and provides greater housing choices, the current economic reality poses new challenges and uncertainty.

While these unanticipated, yet fortunate, revenue gains helped to resolve our operating deficit, it is a short-term solution, especially considering present market stability. As a modern regulator, we recognize that responding to the demand for intervention, advancing strategic initiatives, facilitating necessary staffing increases in front-line staff are essential and continue to drive operating expenses. Our Management and Board will continue to monitor and adjust plans accordingly to manage longer-term sustainability while improving service level standards, strengthening resident protection and instilling public confidence.

I want to thank the many partners who support our mission—residents and their families, licensees, caregivers, community, health and seniors' organizations, and our Stakeholder Advisory Council, whose insights help us be a more responsive and effective regulator. I also extend my deep appreciation to the RHRA staff and Board, whose compassion and commitment are central to our work in protecting seniors.

Sincerely,



Jay O'Neill
Chief Executive Officer and Registrar



About the Sector

Licensed homes	As of March 31, 2025		As of March 31, 2024		As of March 31, 2023		As of March 31, 2022		As of March 31, 2021	
	Homes	Suites	Homes	Suites	Homes	Suites	Homes	Suites	Homes	Suites
Total	**781**	**73,076**	**776**	**71,518**	**776**	**69,928**	**778**	**69,253**	**774**	**66,842**

Note: Suites are a measure of capacity, not actual residents. Issued licences and suites represent the net change among any licences added and surrendered during the year.

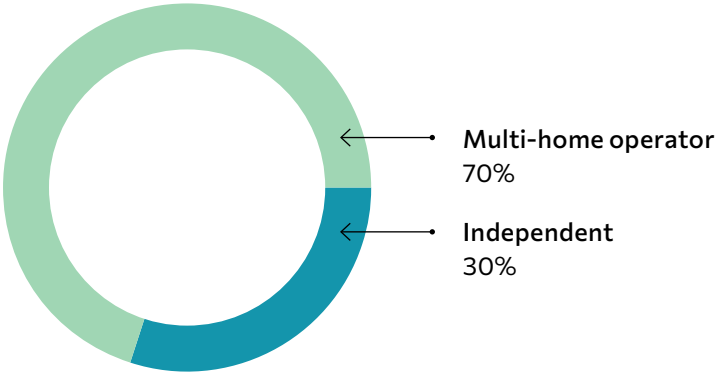
Breakdown by home size as of March 31, 2025:

Category	Homes	Suites
*Small (25 suites or less)	76	1,232
Medium (26 to 99 suites)	383	24,279
Large (100+ suites)	322	47,565

**Since 2018, small homes have decreased from 15 per cent to 10 per cent of all licensed homes. Similarly, the number of suites available in small homes has decreased from three per cent to two per cent.*

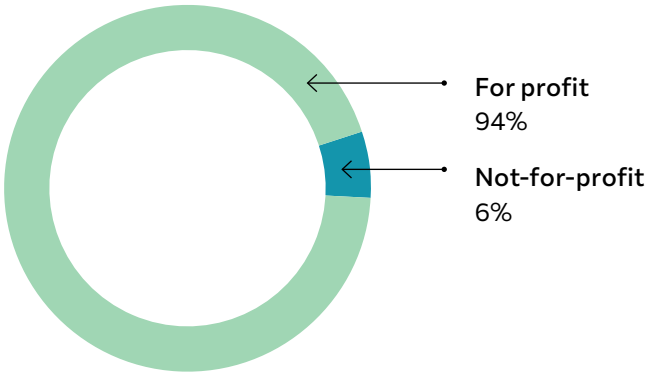
Breakdown by multi-home operator vs independent ownership as of March 31, 2025:

Category	Homes	Suites
Multi-home operator	544	56,823
Independent	237	16,253



As of March 31, 2025, 46 homes out of the 781 licensed homes (3,498 suites) were owned by not-for-profit corporations.

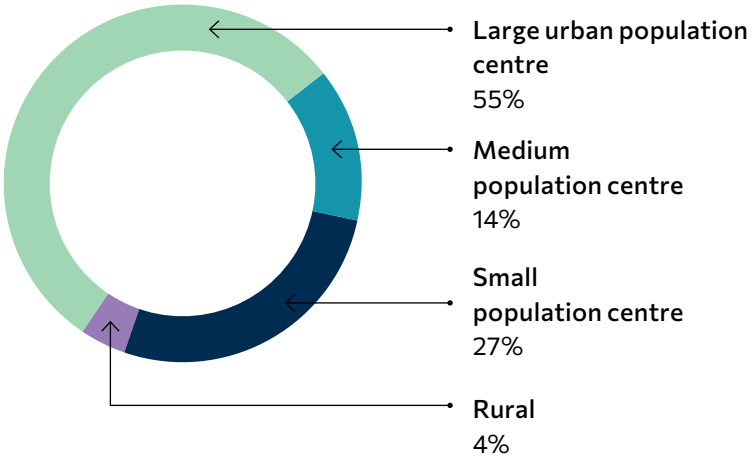
Category	Homes	Suites
For profit	735	69,578
Not-for-profit	46	3,498



Breakdown by urban/rural population centres as of March 31, 2025:

Category	Homes	Suites
Large urban population centre	434	47,588
Medium population centre	112	10,493
Small population centre	207	13,945
Rural	28	1,050
TOTAL	**781**	**73,076**

Note: Based on Statistic Canada's definition of rural, small, medium and large urban population centres.



Retirement homes range significantly in the variety and number of care services they offer.

The **most common care services** identified by over 90 per cent of licensed retirement homes are:

- provision of meals
- administration of a drug or another substance
- assistance with bathing and hygiene
- assistance with dressing
- pharmacist and nursing services

The **least common care services** identified by licensed retirement homes are:

- skin and wound care *(134 homes)*
- dementia care *(167 homes)*
- assistance with feeding *(295 homes)*

45 homes offer all 3 of these services

35 homes identify offering **five or less care services**

204 homes identified offering **six to nine care services**

542 homes identified offering **10 or more care services**



Operational Overview and Themes

Responding to an evolving sector and increased reports of harm/risk of harm

For another consecutive year, the RHRA experienced increases in regulatory activity, along with an increased number of issues requiring regulatory response.

The RHRA continued to focus on the efficient use of its regulatory resources to respond to complaints (108), reports of harm/risk of harm to residents (2,375) and responsive inspections (1,001).

These are detailed further in this report.

Inquiries received

UP 16%

Reports of harm/ risk of harm

UP 46%

Responsive inspections

UP 42%

The RHRA continues to explore ways to proactively reduce harm through our evidence-based risk model. The RHRA will sustain its efforts to work with the sector to create a strong culture of care through proactive compliance and a right-touch approach to regulation.

Sustained increase in requests for services

Intake is frequently the first point of contact for inquiries and concerns from licensees, residents, their families, health care workers and the public.

In Fiscal Year 2024/25, the RHRA experienced an overall combined increase in the number of inquiries, complaints, and reports of harm/risk of harm.

The RHRA saw a steady volume in people contacting us on a range of topics. The overall volume on inquiries/contacts increased 16 per cent year over year.

There was a decrease in cases categorized under complaints/concerns about a retirement home, which includes inquiries and concerns related to COVID-19. As operators and residents became more familiar with COVID-19 guidance and requirements, the number of these cases decreased contributing to the overall decrease in this category. However, reports of harm/risk of harm, which is categorized separately, increased significantly. The increase in reports of harm/risk of harm represents types of concerns associated with more serious situations often requiring immediate action.

Issue	FY 2024/25	FY 2023/24	FY 2022/23	FY 2021/22	FY 2020/21
Reports of harm/risk of harm	2,375	1,631	1,433	1,055	1,119
Complaints and concerns about a retirement home	1,059	1,342	1,560	2,355	3,766
Notices of outbreak	1,514	1,510*	1,930	595	790
Licence administration	176	793**	920	823	704
General questions about the Act/ Regulations, RHRA, or retirement homes	2,715	2,002	1,654	1,699	1,618
Total number of contacts with the RHRA	**7,839**	**7,278**	**6,527**	**6,527**	**7,783**

** In July 2023, the RHRA and MSAA removed the requirement for retirement homes to submit information about current COVID-19 outbreaks daily. Instead, only a one-time submission is required at the end of the outbreak. This process was also digitized with a link to an online form for convenience.*

*** Licence administration cases in FY 2023/24 include 518 legacy cases that were closed during data cleanup following migration to the new case management system in May 2023. As such the total number of contacts went from 6,760 in FY 2023/24 to 7,839 in FY 2024/25 (16 per cent increase).*

Evolving nature of some applicants is increasing complexity of regulatory oversight

Licences are required for facilities that meet the definition of a retirement home under the Act.

As the population continues to age, retirement homes are expected to be an attractive sector in which to invest and offer additional housing options for seniors. The RHRA saw a 2.2 per cent increase in retirement home suites this year. The sector is projected to keep growing to meet an increased need for housing for seniors.

In Fiscal Year 2024/25, out of the 47 new licences issued, 10 of the applicants had no experience or an existing retirement home licence, and a total of four licences were issued with conditions.

The RHRA also reviewed and processed changes in licensees' corporate structures. Specifically, seven licensees advised the RHRA about changes in controlling interest and 38 licensees advised the RHRA about changes to corporate structure, both of which required a heightened assessment of the entities with control over a licence.

Overall, there was an increase in the total number of licences issued compared to the previous year with most applications being licence acquisitions. More of the new licences were issued to multi-home operators (35) versus independent operators (12).

Licence applications	FY 2024/25	FY 2023/24	FY 2022/23
New (build/operations)	13	18	13
Transfer of ownership	34	19	29
Operating without a licence	0	0	2
Total	**47**	**37**	**44**

Licenced homes	As of March 31, 2025		As of March 31, 2024		As of March 31, 2023	
	Homes	Suites	Homes	Suites	Homes	Suites
Issued	744	71,264	736	69,416	746	68,427
Issued with conditions	37	1,812	40	2,102	30	1,501
Total	**781**	**73,076**	**776**	**71,518**	**776**	**69,928**

Surrenders

In Fiscal Year 2024/25, a total of seven licences were surrendered by the licensee and one licence was revoked by the RHRA. These eight surrendered or revoked licences involved a total of 503 suites. Factoring in the surrendered licences, there was still a net increase of 2.2 per cent in overall suite growth in Fiscal Year 2024/25.

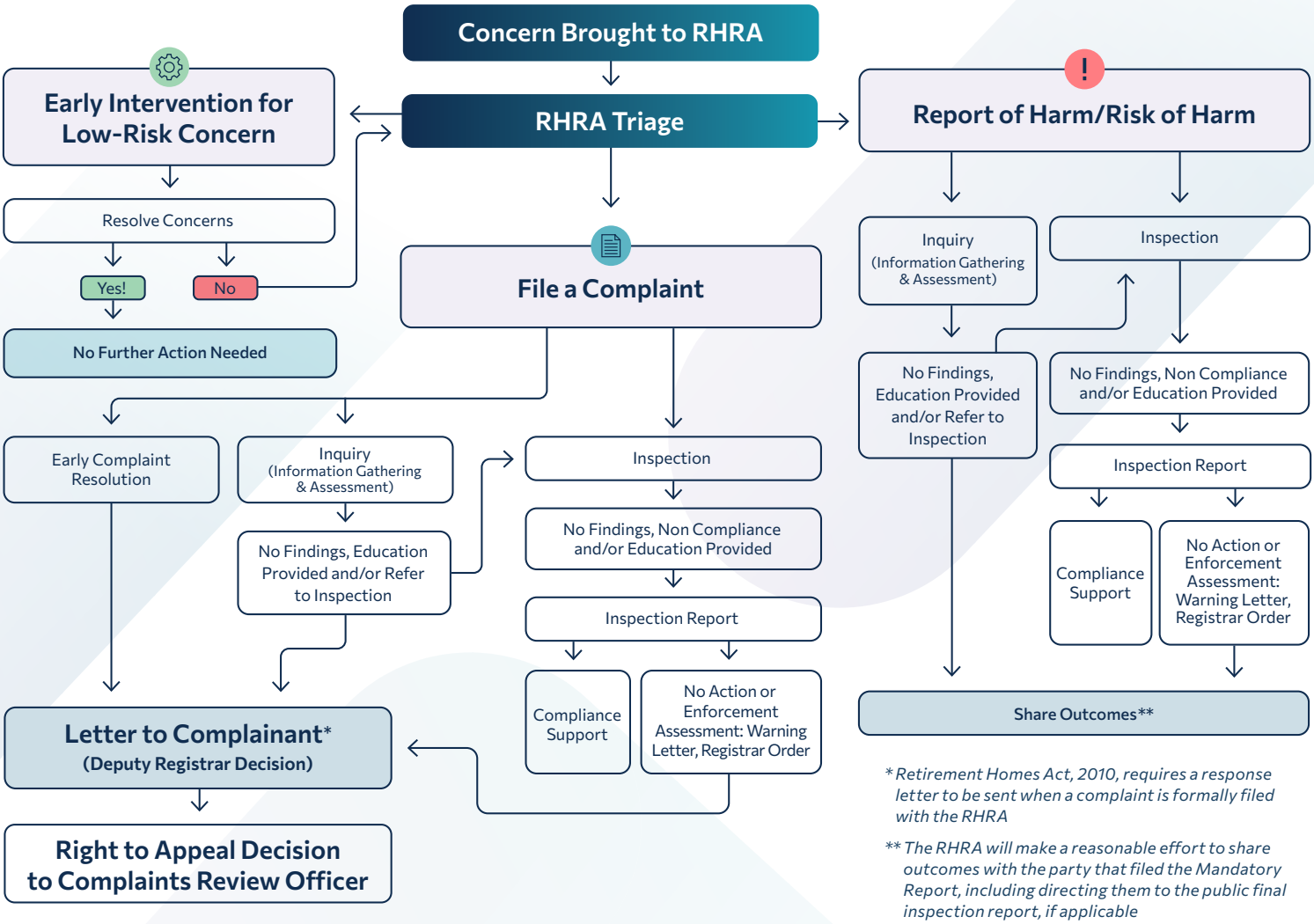
In Fiscal Year 2024/25, eight licences were surrendered or revoked for reasons such as financial challenges, no longer meeting the definition of a retirement home and property redevelopment. A total of 57 per cent of licence surrenders were from independent operators and are not part of a corporate multi-home operator, which is comparable to last fiscal year. Most suites impacted by surrenders were in a large urban population centre.

Responding to resident concerns

The RHRA is committed to safeguarding licensed retirement home residents and acting diligently to address concerns related to their safety and well-being.

When the RHRA receives concerns about residents, these concerns can be triaged through one of three main processes: early intervention, complaints and reports of harm.

How a Concern is Processed at the RHRA



** Retirement Homes Act, 2010, requires a response letter to be sent when a complaint is formally filed with the RHRA*

*** The RHRA will make a reasonable effort to share outcomes with the party that filed the Mandatory Report, including directing them to the public final inspection report, if applicable*

More information on the RHRA's complaint handling process and how to submit a complaint is available on RHRA.ca.

Early Intervention for low-risk concern

Resolving concerns efficiently from residents and retirement homes through early intervention

The RHRA recognizes that those with concerns want them addressed quickly and effectively. Recognizing this need, the RHRA introduced its early intervention program in early 2020 so it could help residents, families and licensees resolve concerns efficiently and effectively. This program, where possible and appropriate, helps to avoid the more time-consuming processes associated with complaints by finding resolutions acceptable to all parties involved.

Concerns addressed through early intervention do not result in formal Registrar decisions but can produce faster outcomes such as improved communication and/or process changes at the retirement home. Concerns addressed through early intervention do not require the submission of a complaint form by a complainant, and depending on the circumstances, can be processed anonymously.

Early interventions remained consistent in Fiscal Year 2024/25 with the previous year with a total of 103 successfully resolved cases. On average, concerns handled through early intervention were resolved within eight business days, whereas complaints were resolved within 102 business days on average. This work continues to reduce the number of complaints received and the additional administrative work that goes along with them, while achieving satisfactory resolutions.

Total early interventions to resolve concerns	
FY 2024/25	103
FY 2023/24	101
FY 2022/23	82

File a Complaint

Responding to complaints and facilitating resolution

Complaints always involve the submission of a complaint form, with authorization from the complainant acknowledging their understanding that the retirement home will be notified of their complaint. Complaints cannot be submitted anonymously. Complaints always result in a Registrar decision letter at the end of the process, which details the information collected in response to the concerns and outlines what action, if any, the RHRA took to address the concerns.

In Fiscal Year 2024/25, while the RHRA received a similar number of complaints compared to the previous year, there remains a significant increase in complaints compared to years prior, totalling a 69 per cent increase compared to Fiscal Year 2022/23.

Despite sustained volumes and targeted efforts to improve timelines, the RHRA closed 13 per cent less complaints than the previous fiscal year. Complaints are generally becoming more complex, and one complaint may contain multiple issues/requests (2.3 concerns per complaint on average). Further, sustained increases in areas such as mandatory reports of harm and associated responsive inspections continue to place capacity and resources pressures on the RHRA, resulting in longer timelines to close complaints.

Action type	Details	Standards	% of closed complaints that met the standard
Early Resolution	1 Complaints received and acknowledged → 2 Home notified of complaint and request for information sent to home → 3 Debrief with complainant → 4 Registrar decision	50 days	89%
Inquiry	1 Complaints received and acknowledged → 2 Home notified of complaint and request for information sent to home → 3 Debrief with complainant → 4 Registrar decision	70 days	50%
Inspection	1 Complaints received and acknowledged → 2 Home notified of complaint and request for information sent to home → 3 Final inspection report → 4 Debrief with complainant → 5 Registrar decision	120 days	40%

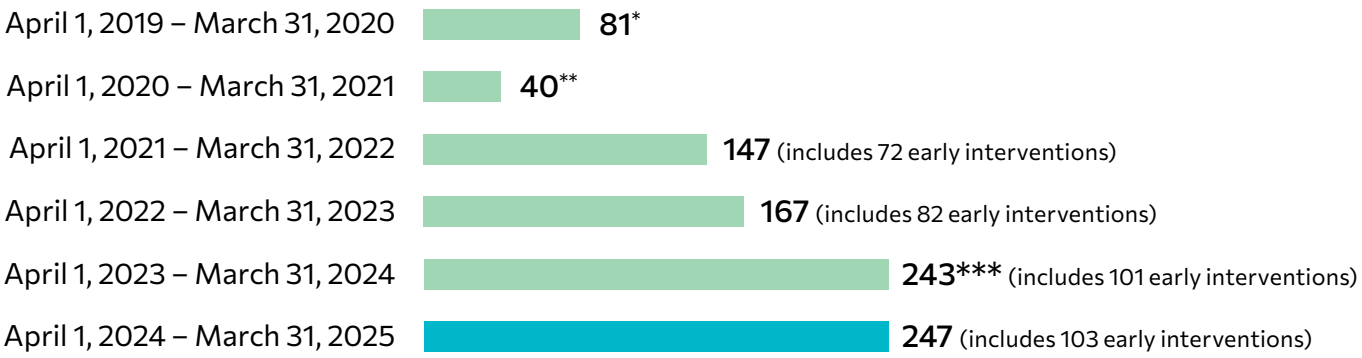
The RHRA's underlying objective is to help resolve complaints fairly, thoroughly and within a reasonable time, depending on the complexity of each matter. Early complaint resolution is where the RHRA works with the complainant and the retirement home to reach an agreed-upon outcome in an efficient and time- effective manner. Early complaint resolution is suitable in situations where the complaint is not associated with serious harm or risk of harm and where both the complainant and the retirement home agree to mediation to resolve the concerns.

Early complaint resolution does not typically include an inspection of the retirement home or a request for substantial documentation. The Registrar issues a brief decision at the end of the early complaint resolution process to conclude that the complaint has been resolved to the satisfaction of the complainant. These complaints can be processed faster than those requiring an inspection or inquiries.

Total early complaint resolutions	
FY 2024/25	9
FY 2023/24	13
FY 2022/23	10

Number of complaints

per fiscal year



**The RHRA started its early intervention program in early 2020.*
***Numbers for this year were lower due to the RHRA's focus on pandemic-related response.*
****Number has been updated from last year's annual reporting to reflect one backdated case.*

Complaints	FY 2024/25	FY 2023/24	FY 2022/23
Received during FY	247*	243**	167***
Closed during FY	211*	225**	175***
Open at end of FY	95	59****	41

** Includes 103 early interventions.*
*** Includes 101 early interventions.*
**** Includes 82 early interventions.*
***** Number has been updated from last year's annual reporting to reflect one backdated case.*

Complaints trends

The RHRA has continued to see the following trends over the past year:

- More complex care needs. For example, the RHRA has received concerns about retirement home operators refusing residents' return to home from hospital because they cannot offer the care required, respite and palliative care, and the integration of care between the retirement home and external care providers.
- Disputes between multiple substitute-decision-makers with respect to a resident's care needs.
- Cost of living increases and cost of rent/care services, which is not part of the RHRA's mandate.
- Insufficient staffing to align with the care needs of residents.



This past year, the RHRA received more complaints with serious concerns and adverse resident outcomes, which resulted in enforcement action.



More serious complaints represented 63 per cent of all complaints received, which required an inspection. On average, each of these more serious complaints contained three concerns.



42 per cent of concerns dealt with by inspection related to improper or incompetent care, or abuse or neglect of a resident – two of the most complex types of complaints reported to the RHRA requiring immediate follow-up and an extensive analysis of information.

Report of Harm/Risk of Harm

Responding to increased reports of harm/risk of harm effectively and efficiently

An important element of the RHRA's resident protection mandate is to respond to reports of harm/risk of harm. The RHRA treats these reports with urgency as they involve potentially serious threats to the safety, well-being and dignity of residents.

Reports of harm/risk of harm should be submitted by anyone who suspects, witnesses, or receives information alleging harm/risk of harm to one or more residents. These reports result in an inspection report if applicable and are generally finalized faster than complaints. A report of harm/risk of harm may be escalated for enforcement action as appropriate. Reports of harm/risk of harm can also be made anonymously, unlike complaints.

In Fiscal Year 2024/25, the RHRA received **2,375 reports**, which represents a 46 per cent year-over-year increase compared to the previous fiscal year.

Over the last five years (Fiscal Year 2019/20 to Fiscal Year 2024/25), reports of harm/risk of harm have increased by 148 per cent.

Most commonly, reports of harm/risk of harm relate to concerns of abuse, of which physical abuse is the most common type. This demonstrates a retirement home population that continues to evolve with complex care and associated responsive behaviours posing a risk to other residents. The other most common concerns that result in responsive inspections include improper or incompetent treatment or care and neglect, specifically not receiving a care service or not following the plan of care.

A total of 82 per cent of reports of harm/risk of harm reported to the RHRA last year were from retirement homes, which is slightly higher than the previous year at 73 per cent. Of all reports of harm/risk of harm that resulted in inspections, 41 per cent had findings of non-compliance.

These reports range from requiring immediate onsite inspection to less serious allegations that can be resolved through remote inquiries and/or document reviews rather than an onsite inspection. The RHRA conducts onsite inspections where there is the greatest risk of harm.

In Fiscal Year 2024/25, these reports resulted in 927 onsite inspections of retirement homes, with the balance addressed by remote inquiry. This represents an increase of 42 per cent in the number of inspections resulting from reports of harm/risk of harm year-over-year. The RHRA has prioritized these responsive inspections while also proactively inspecting every licenced retirement home at a minimum of once every three years.

Even with this increased need for regulatory interventions, the RHRA is meeting target timelines for reports of harm/risk of harm escalated for inspections. Concerns that were associated with lower risks of harm successfully met target timelines after conducting inquiries. This reflects an improvement compared to Fiscal Year 2023/24 where target timelines for reports addressed via inquiries were not met. This improvement is due to the RHRA increasing staffing levels and efficiencies gained through reports of harm/risk of harm submitted through the RHRA Self-Service Portal.

The RHRA continues to assess the contributing factors to the overall increase in reports of harm/risk of harm. While this remains work in progress, some expected reasons include:

- Increased awareness of the RHRA's mandate to regulate the retirement home sector and mandatory reporting obligations.
- More complex care needs among certain retirement home residents.
- Continuing difficulties among homes in recruiting, training and retaining staff.
- The implementation of the RHRA Self-Service Portal creating streamlined interaction.

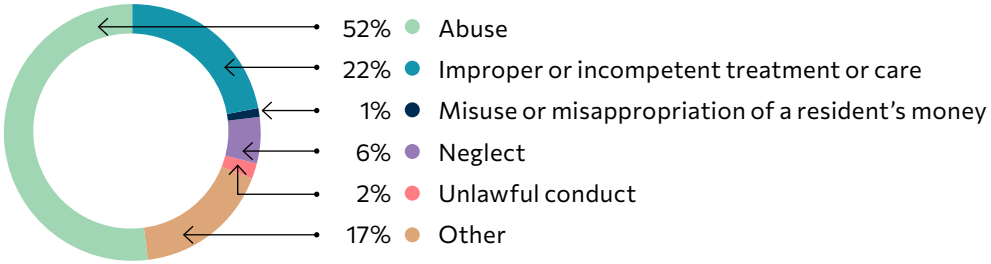
The chart below breaks down the issues or concerns reported to the RHRA through reports of harm/risk of harm in Fiscal Year 2024/25. There were 2,912 concerns recorded within 2,375 reports of harm/risk of harm closed in Fiscal Year 2024/25. Multiple issues are often submitted at once, and on average, 1.2 concerns are reported per Mandatory Report.

Reports of harm/risk of harm: allegation type	FY 2024/25	FY 2023/24	FY 2022/23
Abuse	1,526	945	744
Improper or incompetent treatment or care	642	405	325
Misuse or misappropriation of a resident's money	19	22	22
Neglect	187	322	117
Unlawful conduct	58	36	22
Other concerns*	480	338	203
Total	**2,912**	**2,068**	**1,433****

**Captures concerns that are raised along with the report of harm/risk of harm. These concerns are not linked to a form of abuse or neglect, but are addressed by the RHRA.*

***Data from past fiscal years show one concern per report of harm. In Fiscal Year 2023/24, the RHRA upgraded its data systems, which enabled tracking of a broader range of concerns.*

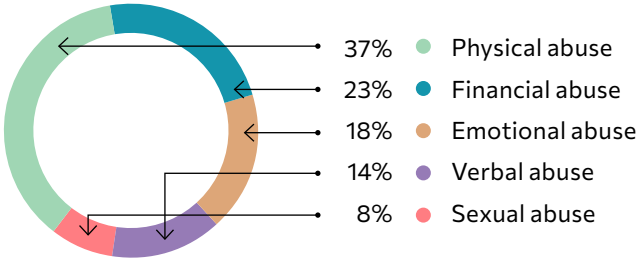
Reports of harm/ risk of harm: allegation type 2024/25



The chart below breaks down the specific type of alleged abuse along with the number of reports received.

Type of alleged abuse	FY 2024/25	FY 2023/24	FY 2022/23
Physical abuse	568	313	314
Financial abuse	350	240	207
Emotional abuse	277	172	76
Verbal abuse	211	126	75
Sexual abuse	120	94	72
Total	**1,526**	**945**	**744**

Type of alleged abuse 2024/25



Inspections

In general, there are two types of inspections conducted by the RHRA: routine and responsive.

Routine inspections are proactively completed to assess for compliance using a risk-based approach and are conducted at least once every three years for lower risk homes and more than once a year for some of the higher-risk homes. Our risk-based approach leverages our data and analytics to determine the frequency of our follow-up inspection schedule, with a greater focus and resources on higher-risk homes.

Responsive inspections are conducted when the RHRA receives information that there may have been non-compliance with the Act or regulations, typically received through a report of harm/risk of harm or a complaint. Responsive inspections are prioritized, especially if the information received indicates harm/risk of harm to a resident.

In Fiscal Year 2024/25, the RHRA conducted a total of 1,658 inspections within 676 facilities. This represents a 22 per cent increase year over year. Of the total inspections conducted in Fiscal Year 2024/25, 50 per cent resulted in findings of non-compliance with the Act and regulation. Seven per cent included findings identified as critical to resident health, safety or well-being, and were escalated for enforcement consideration.

The RHRA conducted 635 proactive inspections of homes this fiscal year, which represents a four per cent increase over the previous year. This is, in part, due to the RHRA's assessment of risk of homes, with an increased number of homes requiring proactive inspections this year.

Inspections	FY 2024/25	FY 2023/24	FY 2022/23
Routine	635	612	541
Mandatory report inspection (s. 75)	927	651	507
Complaint inspection (s. 84)	74	59	36
Compliance inspection (s. 77(1))	5	16	91
Report to Registrar (s. 77(2))	16	15	14
Licensing inspection (s. 37)	1	1	2
Total	**1,658**	**1,354**	**1,191**

Remote inquiries

As noted earlier, the RHRA received significantly more reports of harm/risk of harm year-over-year. The Act provides the RHRA the ability to conduct a risk assessment of each report of harm/risk of harm to determine whether it would be appropriate to conduct an inspection or undertake remote inquiries to determine compliance. Remote inquiries involve reviewing compliance history, asking questions, and requesting documents to assess the scope of the concern, determine if it's recurring, and ensure the home has taken steps to mitigate future risk to residents

Remote inquiries enable the RHRA to use resources most efficiently without impairing its ability to address risk of harm to residents. As a result, the RHRA conducted 1,470 remote inquiries this year, along with 905 referred for inspection. This represents a 46 per cent increase in activity over the previous last year.

	Reports of harm/ risk of harm	Referred for inspection	Closed by inquiry
FY 2024/25	2,375	905	1,470
FY 2023/24	1,631	703	928
FY 2022/23	1,433	576	857

Regulatory intervention where it is most needed

Taking action with a view to encouraging and maintaining compliance

The RHRA has the authority to conduct inspections or investigations at licensed or unlicensed retirement homes as part of its powers under the Act. Inspections are regulatory in nature, while investigations most often involve the execution of a search warrant and could be used in circumstances where a prosecution in Provincial Offences Court is possible. In Fiscal Year 2024/25, the RHRA initiated four investigations into potential offences under the Act.

The RHRA has a process for escalating some inspections to enforcement for review for further regulatory action. Where the findings of an inspection meet certain criteria, enforcement will review those inspections and, in appropriate circumstances, may make a recommendation for enforcement action to the Deputy Registrar. The Deputy Registrar will review the recommendations and inspection findings and may decide to take some form of enforcement action.

The RHRA issued 59 Enforcement Orders or decisions, including 24 Compliance Orders and two Management Orders related to matters such as plans of care, staff training, behaviour management, failure to protect from abuse, and neglect. The total number of enforcement actions taken by the RHRA decreased by approximately 16 per cent from the previous year.

Enforcement order overview

Type of action	FY 2024/25	FY 2023/24	FY 2022/23	FY 2021/22	FY 2020/21
Impose conditions on a licence (s. 39)	8	16	14	12	12
Refuse licence (s. 36)	0	1	0	0	0
Order to apply or cease to operate (s. 89)	4	1	6	8	6
Compliance order (s. 90)	24	27	21	21	28
Management order (s. 91)	2	3	4	7	11
Administrative penalty (s. 93)	21	21	18	20	14
Order to revoke (s. 95)	0	1	0	5	8
Total Orders/Decisions	**59**	**70**	**63**	**73**	**79**

Stopping retirement homes from operating without a licence

Last year, the RHRA received 34 tips and conducted 16 inspections of premises suspected of operating without a licence, resulting in one order to apply for licence or cease operating. Three additional orders were issued as carry over from Fiscal Year 2023/24.

	FY 2024/25	FY 2023/24	FY 2022/23
Tips about potential unlicensed retirement homes	34	29	40

Consumer protection tip!

It is important for seniors considering a move to a retirement home to confirm that it is licensed by the RHRA. When residents choose a licensed retirement home, they can have confidence that:

- Licences are only granted to those who meet the legal standards and requirements to operate safely.
- The RHRA will respond to complaints and work to resolve concerns.
- The RHRA will take immediate action in cases of harm or risk of harm to residents.
- Residents have rights under the Resident Bill of Rights.
- In case of some emergencies at the licensed retirement home, they may qualify for financial assistance through the RHRA's Emergency Fund.

Monitoring compliance

Compliance Monitoring works with and monitors the progress of licensees to whom the Registrar issued an order or who had conditions imposed on their licences.

Compliance Monitoring helps licensees to connect and coordinate with managers or third-party consultants/educators where they are required to retain a manager or consultant/educator. They also review submissions that a licensee might make pursuant to an Order or Condition, and they assess whether the licensee has met the requirements of their orders or conditions.

For example, where a licensee has been ordered to retain a third-party educator approved by the RHRA to provide its staff with medication administration training, Compliance Monitoring may review the proposed educator, material, and if appropriate, approve the educator. In some cases, Compliance Monitoring may also collaborate internally with RHRA's Licensee Engagement and Support team to make additional guidance and support available to licensees and operators. This may include virtual education sessions on specific areas of the legislation or a recommendation to engage in RHRA's Compliance Support program (see page 35).

Compliance Monitoring has allowed the RHRA to issue orders and conditions that attempt to more precisely target the root causes of non-compliance and harm.

At the end of Fiscal Year 2024/25, 45 individual Orders/Conditions were being monitored compared to 67 at the end of the previous year.

95 per cent of compliance monitoring cases are closed with all requirements of the Order/Condition being met. The remaining five per cent are made up of homes that surrender their licence or have their licence revoked prior to requirements of an order or condition being fully met, or where the home has not complied with the requirements and has been referred for further review by enforcement.

Compliance monitoring in action

The RHRA issued a licence with conditions to a new operator who did not have any experience in the retirement home sector. The conditions included requiring the licensee to retain a person acceptable to the RHRA who would be responsible for monitoring and ensuring compliance with the Act. The Compliance Monitor assisted the new licensee with finding an appropriate individual to fulfill the condition and, since the time of the licence being issued, has reviewed regular reports from the licensee and the person retained pursuant to the conditions. Over the years, the licensee continues to benefit from this assistance, and the compliance record of the home has steadily improved to the point where its most recent inspection had no findings of non-compliance.

Working with community agencies and licensees to strengthen resident protection and support a culture of care

Supporting residents in emergencies

The RHRA's safety response function plays a critical role in addressing crises or emergencies in retirement homes by taking timely regulatory action and supporting an effective community response to protect the welfare of residents. It also engages proactively with partners across the province to establish a network that has shared oversight or interest in supporting licensed retirement home residents, such as local public health units, Ontario Health atHome (OHaH) and municipal/regional agencies.

This work includes facilitating processes for available emergency funding where applicable.

Emergency Fund

The Emergency Fund (the Fund) is a fund held in trust by the RHRA for the benefit of residents and former residents of retirement homes, as required by the Act. Since its inception, 120 residents and former residents of retirement homes have received payments.

All administrative penalties collected by the RHRA must be placed into the Fund, with interest income earned on the balance. It is a legislatively restricted reserve reported in the net assets section in the RHRA Statement of Financial Position and cannot be used for operations under any circumstances, but its growth is recognized as income for the organization. It is managed by the RHRA and is payable to individuals who may have been affected by emergency circumstances in a retirement home, such as a fire or an abrupt closure.

The RHRA is committed to meeting its requirements for the Fund with the provisions for eligible claims and payments. The Fund balance experienced continued growth (eight per cent) and issued a total of 16 payments to residents and their families in Fiscal Year 2024/25.

Emergency Fund	FY 2024/25	FY 2023/24	FY 2022/23
Number of Registrar payments	16	0	0
Total value	$31,362	$0	$0
Fund balance at end of period (March 31st)	**$840,869**	**$777,860**	**$686,113**

All Administrative Penalties received are required by legislation to be allocated to the Emergency Fund.

Crisis management in action

Supporting residents during a sudden home closure in southwestern Ontario

The RHRA was contacted by a licensee advising that their retirement home would close in seven days due to financial crisis. The licensee noted there was only enough food for one week and that staff had not been paid, raising concerns they might walk off the job.

The Act requires that both residents and the RHRA receive at least 120 days' notice before any closure, and that the home operates in full compliance until the final resident leaves. However, the RHRA is prepared to support residents in situations where licensees cannot fulfill this important obligation. The RHRA immediately initiated its abrupt closure procedure and conducted an inspection. It was determined that residents were receiving appropriate care and there was sufficient food for weeks.

The licensee formally notified residents and staff of the impending closure and shared information about the RHRA's Emergency Fund with residents. The RHRA proactively contacted families to ensure they were aware of the resources available to them. The RHRA also reached out to retirement homes in the surrounding area to identify those with available accommodations. This list was shared with OHAH, enabling them to assist residents in finding suitable alternatives quickly.

To protect residents, the RHRA issued a Compliance Order requiring the licensee to maintain appropriate staffing levels and provide regular updates.

In response to the Compliance Order, the licensee provided limited funds to support continued operation of the home until closure.

Throughout the process, the RHRA conducted daily huddles with OHAH, Ontario Health, local mayor's office, local director of medical services, local police, the local hospital, county emergency management services and long-term care representatives. This collaborative effort ensured a safe and well-coordinated transition for residents and prevented disruption in care.

The licence for the home was officially surrendered once all residents had been successfully relocated.

Informing and educating the retirement home sector, residents and public

We are here to help: enhancing efforts to support homes

The RHRA works collaboratively with retirement homes to help them comply with the requirements while recognizing that not all licensees have resources available to help interpret regulation and achieve compliance.

The RHRA recognizes that there are benefits to being able to work together, where appropriate, to address non-compliance outside of regulatory enforcement mechanisms. One way we do this is through our Licensee Engagement and Support (LES) team. LES focuses on providing support by developing compliance education resources and by directly engaging with licensees and operators.

In Fiscal Year 2024/25, LES developed several resources to support licensees and operators:

- The *Personal Assistance Services Devices (PASDs) Guidance Document* provides clarity to licensees and operators on topics such as what is considered a PASD, requirements for the use of PASDs, and requirements for training on the PASD policy.
- The first issue of the *Insight Series* is a resource that provides an overview of key compliance trends that impact resident safety and well-being. Focusing on abuse and neglect as the initial topic, the report highlights important factors for meeting legislative requirements, shares key takeaways and poses reflective questions for licensees and operators to support compliance and promote resident safety.
- To complement the Insight Series, LES developed *four situation-based learning modules* focused on protecting residents from abuse and preventing neglect. These modules are designed to help licensees and operators deepen their understanding of the different types of abuse and neglect, while also serving as a practical learning tool to engage both management and frontline teams.
- To support new licensees and operators, LES developed an *Orientation Package* that highlights legislative areas frequently found non-compliant during a home's first inspection. A LES Specialist also guides licensees and operators through the package over a series of virtual education sessions.

I am writing to say thank you for the article sent today explaining about PASDs and the proper use. It was very well done and easy to understand. I must admit we had been unfairly strict with NOT using PASDs in the past for fear of them being considered as restraints. On the contrary our residents would have benefited in some cases! Now that you have explained what exactly you mean, we will be in a much better position to interpret the true meaning of the Act and how we can utilize PASDs to benefit some residents!

RETIREMENT HOME OPERATOR

PASDs: Personal Assistance Services Devices

In Fiscal Year 2024/25, LES conducted presentations to the following partners:

- Central East Infection Prevention and Control Hub
- Halton Region Public Health – Infection Prevention and Control Education Day
- Ontario Health atHome (Central West)
- Alzheimer Society of Ontario
- Universal Care Canada
- Northumberland Elder Abuse Network
- Humber River Health
- Grey Bruce Ontario Health Team
- Durham Region Infection Prevention and Control Education Day
- Alzheimer's Society – Brant, Haldimand, Norfolk, Hamilton, Halton
- Regulatory Compliance Ontario – Northern Hub
- Ontario Society of Occupational Therapists
- George Brown College
- GeriMedRisk
- Dying with Dignity Canada
- Lakefield Ajax Pickering Hospital
- Public Health Sudbury and Districts
- Alzheimer's Society – Southwest Partners
- Ministry of Labour, Immigration, Training and Skills Development
- Ministry of Long-Term Care
- Thunder Bay Infection Prevention and Control Hub
- Behavioural Supports Ontario – St. Joseph's Health Care Centre

Compliance Support

LES administers RHRA's Compliance Support Program, a voluntary program where licensees, operators and other retirement home staff receive one-on-one support to improve areas where there is identified non-compliance or where homes may benefit from additional guidance. These areas may be self-identified, with licensees and operators requesting to join the Compliance Support program, or be recommended by RHRA staff, such as the inspections team.

In Fiscal Year 2024/25, the RHRA saw an increase in the percentage of citations (79 per cent) closed at follow-up inspections when compared to the previous year (76 per cent) as a result of this program. Furthermore, a total of 40 retirement homes were "closed out" of Compliance Support (out of 54 homes participating), with a total of 248 citations closed upon follow-up inspection out of 313 total citations addressed.

Education and awareness initiatives

The RHRA raised awareness and informed prospective residents and their families of the value of choosing licensed retirement homes, including through:

- Distributing over 8,000 information packages across Ontario to retirement homes, community centres, seniors' hubs and Member of Provincial Parliament (MPP) constituency offices.
- Conducting six presentations and holding eight booths at community/seniors' events, including Seniors Active Living Fairs.
- Distributing information to seniors through three Older Adult Centres' Association of Ontario quarterly newsletters.
- Partnering with the Canadian Association of Retired Persons' (CARP) to share information throughout their network.

As part of our ongoing efforts to serve diverse communities, RHRA recently translated the *Benefits of Living in a Licensed Retirement Home* flyer into Traditional/Simplified Chinese and Tamil. Over 1,000 translated materials have been delivered to retirement homes, community centres and MPP constituency offices.

Multi-Stakeholder Effectiveness Survey

The RHRA conducts its Multi-Stakeholder Effectiveness Survey every three years. In fall 2024, Innovative Research Group, on behalf of the RHRA, administered the survey to a broad range of stakeholders, including residents, retirement home licensees, government partners, industry professionals, seniors, and public health and community partners to assess perceptions of the effectiveness of RHRA.

The survey collected feedback through an online questionnaire for licensees (almost 50 per cent participated) and other stakeholders, and via telephone interviews with approximately 500 retirement home residents.

In 2024, the RHRA's overall Accountability Index Score of 7.3 out of 10 remained unchanged relative to 2021 with licensees rating the regulator higher (increasing from 7.8 to 8.1) and the overall resident score being down marginally from 6.8 to 6.5.

Relative to 2021, more residents are familiar with the RHRA with about 1-in-3 current retirement home residents being somewhat familiar with the regulator, up directionally from 29 to 33 per cent.

The survey also showed that residents, retirement home licensees/operators and other stakeholders value oversight. Among the 13 dimensions of accountability, respondents are most likely to agree that it is important to have an organization that ensures retirement homes follows the rules and shares factual and clear information with seniors and their loved ones.

The majority of residents, stakeholders and licensees also agreed that "higher risk" homes should be subject to more oversight than other homes. However, expectations around whether more or less regulation is needed to protect residents is split across the sector. Retirement homes generally hold an opposing view to residents and other stakeholders on whether more or less regulation is needed in Ontario.

The survey results are available on the RHRA's website and were shared widely with stakeholders. These findings are also important inputs in shaping the RHRA's next strategic plan.



Stakeholder Advisory Council

The Stakeholder Advisory Council (SAC) is established pursuant to section 19.1 of the *Retirement Homes Act, 2010*, and the Memorandum of Understanding (MOU) between the Minister for Seniors and Accessibility and the RHRA. The SAC is not a committee of the Board of Directors and members serve on a voluntary basis. Members are appointed for their relevant knowledge and experience in the retirement homes sector as residents, owners/operators, regulated health professionals and seniors' advocates. The purpose of the SAC is to provide advice to the RHRA on matters pertaining to its resident protection mandate.

Stakeholder Advisory Council Annual Report

Alex Yuan
Chair, Board of Directors
Retirement Homes Regulatory Authority (RHRA)

Dear Mr. Yuan:

On behalf of the Stakeholder Advisory Council (SAC), I am pleased to submit the Council's report on activities and advice to the Board for the Fiscal Year 2024/25.

The Council was pleased to provide advice, insights and feedback on a number of strategic initiatives, including but not limited to:

- Development of new Licensee Engagement Forum, including the selection of a SAC liaison
- 2025 Annual Information Return questions
- Potential and applicable uses of the Emergency Fund to advance resident protection
- Selection of the 2024 Resident Champion Award recipient and finalists
- Research and trends in dementia care
- RHRA's Right-Touch Regulation approach
- Multi-Stakeholder Survey process and participation
- Licensee Portal functionality, usage and ongoing development
- Updates on RHRA's operations, demand for intervention and financial outlook/sustainability
- SAC member recruitment process and the recruitment of three new members

SAC Advice to the RHRA and the RHRA's Board of Directors

Development of New Licensee Engagement Forum

The SAC provided input on the establishment of the RHRA's Licensee Engagement Forum (LEF), a new initiative designed to enhance direct engagement with licensees, operators and managers. SAC recognized the importance of capturing diverse perspectives from retirement homes across the province and advised on the LEF's role in supporting ongoing collaboration with the sector.

Annual Information Return

The SAC remained engaged in the second Annual Information Return. SAC provided feedback on the questions being asked and offered recommendations for future iterations. As a Council, the SAC looks forward to ongoing collaboration as RHRA continues to build on this important initiative.

RHRA's Right-Touch Regulation Approach

As the RHRA continues the evolution of its right-touch regulation approach, SAC provided input on how regulatory oversight can be appropriately tailored to homes who offer different services. This year, discussions focused on two primary areas: dementia care and residents with low care needs.

Research and Trends in Dementia Care

SAC has continued to provide input on emerging trends in dementia care within retirement homes. One key concern raised was the distinction between memory care and dementia care, which can lead to confusion among residents and families.

Approach to Fees

SAC engaged with the RHRA on its 2025/26 fee approach, recognizing the need to balance regulatory sustainability with financial pressures on licensees and the sector. Discussions highlighted increasing demand for regulatory functions year over year. As part of our conversations with the RHRA, SAC advised the RHRA they must ensure it has the proper resources to meet appropriate service level goals and fulfill its resident protection mandate.

Acknowledgments

SAC welcomed three new members in Fiscal Year 2024/25: Pamela Hopwood, Bethanie Pascutto, and David Walton-Ball. Pamela, a PhD candidate at the University of Waterloo, has experience delivering home and community care services to seniors in rural areas. Bethanie, a Staff Litigation Lawyer at the Advocacy Centre for the Elderly (ACE), represents low-income seniors in cases of elder abuse, fraud and other legal matters. David, a retirement home resident and retired professor, has firsthand experience caring for a loved one with dementia and is committed to enhancing resident well-being.

We want to extend our heartfelt appreciation to Vice-Chair, Florene Shuber. Florene will serve another term as the Council's Vice-Chair. SAC is incredibly grateful to Florene for her resident perspective and leadership she brings to every meeting.

On behalf of the SAC, we would like to express our sincere appreciation to the RHRA staff and leadership team for their ongoing support and commitment to engaging with us. Their dedication ensures that our input is valued and heard. We are truly grateful for their commitment to meaningful dialogue and to advancing the regulator's resident protection mandate as effectively and efficiently as possible.

SAC also appreciates the ongoing discussions regarding RHRA's financial and operational outlook and commitment to achieve its service level standards. We recognize the careful balance required to sustain effective regulation while ensuring long-term financial sustainability. SAC values the opportunity to provide insight on these important discussions.

The Council looks forward to continuing its collaboration with the RHRA, providing valuable insights and advice so seniors in Ontario's licensed retirement homes can live with confidence, dignity, and choice.

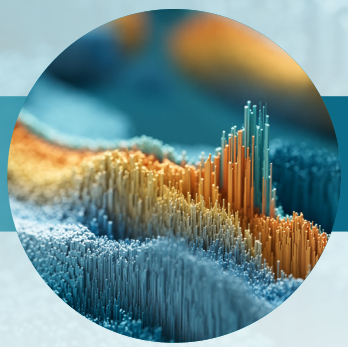
Sincerely,

Rose Lamb

Rose Lamb
Chair, Stakeholder Advisory Council

Andria Bianchi

Andria Bianchi
Past Chair, Stakeholder Advisory Council



Measuring Performance

Fiscal Year 2024/25 represented Year Two in the delivery of the RHRA's 2023 to 2026 Strategic Plan. Below is a summary of progress made against initiatives outlined in the 2024/25 Business Plan, including their associated strategic plan initiative and strategic objective.

Delivering on our Strategic Plan Year Two objectives

Please note that not all initiatives in the Strategic Plan were implemented over the past year – some are scheduled for Year Three.

Strategic Objective 1: Advance an Evidence-Based Regulatory Approach

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Implement an Annual Information Return (AIR) submission program from licensees	**Implement an AIR process** The RHRA intends to implement AIR as part of its annual operations.	The RHRA has implemented AIR as part of its annual operations.
Develop an approach to right-touch regulation that fits with environments of varying risk and burden reduction to licensees	**Explore a potential segmentation model** The RHRA is exploring the potential development of a segmentation model for the retirement homes sector where flexible, responsive and proportionate regulation and oversight could be applied to different types of homes to protect residents and support innovation and growth in the sector.	Retirement homes cater to residents with varying levels of care needs. As such, taking a resident-centric, Right-Touch Regulation (RTR) approach would be more effective than segmenting at the home level. The RHRA is exploring how to apply RTR to a higher needs area (dementia care) and lower needs area (more independent residents with low care needs) such that requirements are proportionate to the risk level. To inform this work, the RHRA commissioned research on broader resident acuity, dementia care, and plans of care and assessments. The RHRA also conducted focus groups with residents on the topic of dementia and updated its Annual Information Return to include more questions related to resident acuity.

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Emphasize initiatives that promote a culture of care through compliance	**Continue to provide compliance support and resources to licensees** The RHRA intends to: • Continue emphasizing preventative initiatives and promote a culture of care and safety through compliance. • Update and enhance its approach to communicating standards, including the popular Compliance Assistance Modules (CAMs) and use of the RHRA website. • Strengthen its relationship with the sector to deliver compliance education leveraging various delivery methods, including partnerships with industry associations.	Licensee Engagement and Support (LES) continues to enhance RHRA's compliance education initiatives, such as orientation meetings with new licensees and operators, to better support the sector and protect residents through improved compliance. LES engaged with 54 homes in their Compliance Support Program, developed guidance on PASDs, published the first issue of our *Insight Series* and released four situation-based learning modules on protection from abuse and prevention of neglect.
Evolve risk framework to sustain focus on preventing and mitigating harms	**Evolving the risk framework to prevent and mitigate harm** The RHRA intends to analyze available data and potentially collect additional data through the AIR process and routine inspections to inform its risk-based approach.	The RHRA collected and analyzed data from routine inspections and the Annual Information Return to increase our understanding of care services offered in retirement homes. The findings from this analysis will inform the development of our RTR approach. As a modern regulator, these valuable data sources are integrated into the RHRA's risk framework to strengthen resident protection. For example, RHRA assesses the rate of self-reporting by homes and conducts inspections more frequently at homes that fail to report harms.

Strategic Objective 2: Build Awareness of Resident Rights and the RHRA's Role

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Deepen our understanding of sector and transparently communicate risk and regulatory trends	**Publishing an Annual Compliance Report** The RHRA intends to launch its first Compliance Report – a resource for licensees that will help identify ongoing and emerging issues and trends in compliance and case studies relating to safety incidents in retirement homes.	Evolved into the *Insight Series*, a resource that provides sector-wide data about common areas of non-compliance impacting resident safety and well-being. The topic of the 2024/25 *Insight Series* focused on abuse and neglect. Licensees and operators can leverage this information to inform, review, intervene and strengthen their practices for the benefit of their home and the residents they serve.
Strengthen forums and processes for feedback with residents and their families to improve their awareness of the RHRA	This effort is part of the RHRA's regular operations and continuous quality improvement – as such, there is no specific 2024/25 Business Plan commitment for Year Two of the Strategic Plan.	The RHRA attended community events hosted by municipalities and/or seniors-serving organizations to engaged with current and prospective retirement home residents. This included over five Senior Active Living Fairs, the Older Adults' Centre of Ontario (OACAO) conference. The RHRA also delivered five presentations to retirement homes and held six Resident Network meetings.
Rebuild/redesign website	**Making the RHRA's website more user friendly** The RHRA will begin work on a stakeholder needs analysis and a Request for Proposals to obtain specialized expertise for this initiative. The RHRA will continue improving content available on its website.	The RHRA continues to review its website and update material to make it more plain language and relevant. The RHRA retained specialized expertise to conduct a user needs analysis across various stakeholders. Work began in Q4 of Fiscal Year 2024/25 and completed in Q1 of Fiscal Year 2025/26. To support the website redesign, the RHRA began work to refresh its visual identity to achieve and maintain accessibility standards.

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Expand outreach to diverse communities	**Engaging diverse stakeholders** The RHRA will continue to draft and distribute new resources and collateral material in other commonly spoken languages and establish relationships with organizations serving diverse and cultural communities.	As part of our ongoing efforts to serve diverse communities, RHRA recently translated the *Benefits of Living in a Licensed Retirement Home* flyer into Traditional/Simplified Chinese and Tamil. Over 1,000 translated materials have been delivered to retirement homes, community centres and MPP constituency offices.
Inform prospective residents and their families of the value of choosing licensed retirement homes	This effort is part of the RHRA's regular operations and continuous quality improvement – as such, there is no specific 2024/25 Business Plan commitment for Year Two of the Strategic Plan.	The RHRA informed prospective residents and their families of the value of choosing licensed retirement homes through: • Distributing over 8,000 information packages across Ontario. • Six presentations and eight booths at community / seniors' events, including Seniors Active Living Fairs. • Distributing information to seniors through three OACAO quarterly newsletters. • Partnering with the Canadian Association of Retired Persons' (CARP) to share information throughout their network.

Strategic Objective 3: Engage, Collaborate and Foster Partnerships

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Improve stakeholder engagement structure	**Enhancing the Stakeholder Advisory Council (SAC)** The RHRA will continue to enhance and leverage the SAC to its full potential over the coming fiscal year. Building on this work, the RHRA will consider changes to the SAC's composition as it explores creating other advisory councils.	The SAC is the RHRA's dedicated multi-stakeholder forum with a reporting relationship to the RHRA's Board of Directors, per the Memorandum of Understanding with Government. The SAC allows for collaborative dialogue across diverse stakeholder perspectives on the RHRA's initiatives. To further enhance the SAC, the RHRA established a SAC Liaison for the Licensee Engagement Forum (LEF) and the Resident Network (RN) respectively to enable broader viewpoints and information sharing between the formal SAC and stakeholder-specific forums such as the LEF and RN.
Increase direct licensee engagement	**Creating a Licensee Advisory Council** The RHRA will increase direct licensee engagement with the creation of a new Licensee Advisory Council.	Developed and published the Licensee Engagement Forum Terms of Reference and launched recruitment process in Q4 of Fiscal Year 2024/25.
Strengthen engagement with community partners	**Building new partnerships** The RHRA intends to continue partnership building with professionals who interact with and advise seniors.	Strengthened partnerships with Behavioural Supports Ontario and the Alzheimer's Society at provincial and regional levels, as well as with the Canadian Association of Retired Persons and HelpAge Canada. These partnerships help inform various regulatory activities and provide subject matter expertise in areas relating to behaviour strategies and dementia care as well as helping to inform seniors of their options in choosing a licensed retirement home.

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Proactively engage elected officials and other government administrators	**Helping elected officials to support their constituents** The RHRA will continue to engage with elected officials and their staff to increase awareness of the RHRA and the legislation that provides protections to those living in retirement homes, with a particular focus on constituents choosing a licensed retirement home.	The RHRA held 12 introductory meetings with MPPs and worked with 19 constituency offices to help resolve issues related to local retirement homes. The RHRA continues to engage with elected officials and their staff as part of regular business.
Provide advice to address definition issues	**Defining care services within the *Retirement Homes Act, 2010*** The RHRA continues to analyze whether elements of the definition of a 'retirement home' and 'care services' require clarification on interpretation and application, and/or whether amendments may be required.	The RHRA provided information and advice to MSAA on elements of the definition of a 'retirement home' and 'care services'.
Provide advice and collaborate with the Ministry for Seniors and Accessibility/ Government on priority items related to consumer and resident protection or legislation	**Working closely with the MSAA on Infection Prevention and Control (IPAC)** The RHRA will continue to support the Government in its review of items related to IPAC and emergency preparedness. **Supporting the MSAA in its policy work** Upon request, the RHRA supports and engages with the MSAA and the Government on potential policy proposals impacting Ontario's retirement homes and their residents.	The RHRA provided advice to enhance the safety of older Ontarians who live in retirement homes, including by supporting the development of the *Support our Seniors and Caregivers Act*. The bill, introduced in the Legislature in 2024 and reintroduced in May 2025, proposes to amend *the Retirement Homes Act, 2010*, to reinforce residents' rights to caregiver support and to provide authority for MSAA to issue sector-specific direction and recommendations to licensees respecting the prevention and management of infectious respiratory and gastrointestinal diseases in retirement homes. In Fiscal Year 2024/25, one minor change was made to the *Retirement Homes Act, 2010*, Regulation 166/11.

Strategic Objective 4: Enable Impact through Operational Excellence

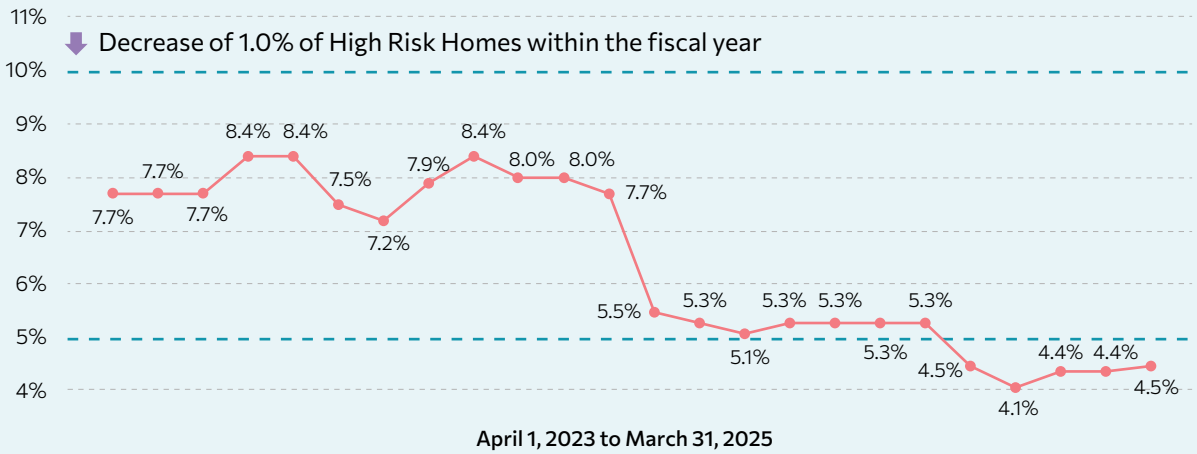
Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Standardize internal review processes to routinely evaluate administrative burden reduction and efficiency opportunities	**Reducing administrative burden** The RHRA will continue to reduce administrative burden without impacting resident protection.	See **Reducing Administrative Burden** section (page 61) of the Annual Report for details.
Increase use of technology with licensees and stakeholders	**Launching a secure portal for licensees** The RHRA intends to test, incorporate stakeholder feedback and launch the Self-Service Portal for licensees in phases. **Filing complaints and reports of harm and risk of harm safely online** The RHRA intends to incorporate stakeholder feedback and launch the Complaints and Reports of Harm and Risk of Harm webforms on its website.	In September 2024, the RHRA fully launched the Self-Service Portal. Prior to its launch, the RHRA gathered feedback from prospective users, incorporated into the design. For example, complaints and reports of harm/risk of harm webforms are written in plain language. The RHRA continues to monitor feedback about user experience from survey submissions and other communications. Some enhancements, such as improvements to the application for a change in controlling interest, have already been implemented. Significant efficiencies have been gained as manual data entry has decreased, which is primarily reflected in the improvement of successful timelines for reports of harm/risk of harm. We expect to see increased use of the Self-Service Portal by licensees as users become familiar with the tool and with continued communication by the RHRA about its benefits.

Strategic Plan initiative	FY 2024/25 Business Plan commitment (if applicable)	Progress
Continue implementation of Data Management Strategy and privacy practices	**Enhanced data management and privacy protection** The RHRA continues to implement its Data Management Strategy and privacy practices.	The RHRA developed and implemented new information access and privacy policies and procedures to implement its new Information Access and Privacy Code and responded to 35 requests for information. The RHRA also revised its document retention schedule to align with its new document management system.
Improve transparency of resource requirements and allocation	**More predictability around future fees** The RHRA intends to explore the adoption of a rolling three-year fee determination process which would include consultation with the industry and stakeholders.	The RHRA continued its process to support improvements in program cost reporting that will enhance transparency of our resource requirements and allocation. A decision was made not to proceed with a rolling 3-year fee determination process due to comparative regulator benchmarking, feasibility and unreliable market conditions.

Delivering on the RHRA's Strategic Plan Performance Measures

Performance Measure	Additional Information	Target Structure	Outcomes
Proportion of High-Risk Homes (supports the objective to Advance an Evidenced-Based Regulatory Approach)	Uses the RHRA's risk-based regulatory model to target interventions in the high-risk portion of non-compliant homes operating in Ontario.	Proportion of homes in the high-risk category is maintained between five per cent and 10 per cent, the range is based on a rolling three-year trend.	As of March 31, the number of high-risk homes was slightly below the established target (4.5 per cent). In Fiscal Year 2025/26, we will closely monitor and analyze trends to determine whether this will move back within the established target.

Proportion of High Risk Homes



Performance Measure	Additional Information	Target Structure	Outcomes
Licensee Compliance Resources (supports the objective to Engage, Collaborate and Foster Partnerships)	Promotes compliance with legislative requirements by proactively identifying and producing education resources on priority topics.	Every year, the top five areas for risk of harm are identified and any new compliance resources needed are produced within 12 months.	In Fiscal Year 2024/25, the RHRA produced guidance documents for PASDs as well as abuse and neglect. These informative resources support licensees and operators in achieving their obligations under the Act and regulation. The guidance document on abuse and neglect serves as the foundational document in a broader abuse and neglect education strategy that saw the publication of four Compliance Assistance Modules, which were completed in March 2025 and published in April 2025. The RHRA continues to make progress against this commitment, but overall timeline not met due to capacity and resource constraints. The final topic, medication administration, will be addressed through the 2025/26 *Insight Series*.

Top Areas of Non-Compliance associated with Harm

Educational Materials for Licensees

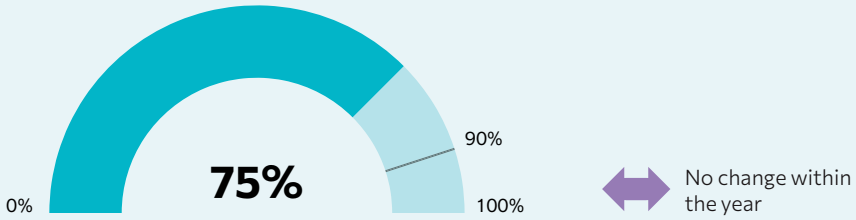
Area of Non-Compliance Associated with Harm	Educational Materials
Abuse and Neglect	✓
Behaviour Management	✓
Resident Record, Assessment, Plan of Care	✓
Staff Training	✓
Medications	

Performance Measure	Additional Information	Target Structure	Outcomes
Accountability, Trust and Collaboration (supports the objectives to Engage, Collaborate and Foster Partnerships as well as Enable Impact Through Operational Excellence)	Demonstrates the RHRA's commitment to continuously improving effectiveness based on stakeholder feedback. Measured at minimum once every three years through a multistakeholder survey. Results are rolled into a combined Accountability Index Score. Previous combined index score was 7.3 overall (Stakeholders separately rated the RHRA at 7.8 while Residents rated the RHRA at 6.8).	Conduct a multi-stakeholder survey at a minimum once every three years. Next survey to be conducted in Fiscal Year 2024/25 Increase overall Accountability Index Score to 7.5 among stakeholder groups. The survey asks questions of stakeholders and residents each to rate the RHRA on satisfaction with service, value delivered and value of oversight, transparency, and responsiveness, among other categories. Satisfaction is measured on 13 categories.	The multi-stakeholder survey yielded an overall Accountability Index Score of 7.3 out of 10 among stakeholder groups which is unchanged from 2021 results and slightly below the target of 7.5. Separately, the RHRA was rated at 6.5 (directional decrease) by residents, 8.1 (directional increase) by retirement homes and 8.1 (directional increase) by stakeholders that serve seniors and the sector. These results, including efforts to increase the overall Accountability Index Score to 7.5, will be considered as part of the RHRA's strategic planning process in Fiscal Year 2025/26.

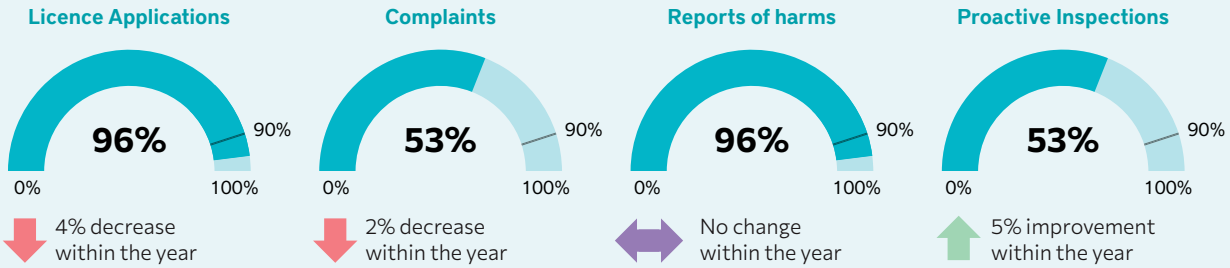
Performance Measure	Additional Information	Target Structure	Outcomes
Public Awareness (supports the objective to Build Awareness of Residents' Rights and RHRA's Role)	Demonstrates the RHRA's commitment to raising awareness of the regulator's role, resources and value. Measured at minimum once every three years through a multistakeholder survey. In 2021, residents responded with an overall awareness rate of 29 per cent.	Ensure resident participation rate of a minimum of 500 responses. Increase resident awareness of the RHRA to 35 per cent by Fiscal Year 2025/26.	Resident awareness increased by four per cent, from 29 per cent in 2021 to 33 per cent. The multi-stakeholder survey achieved a total participation of 705 from the following: • 502 residents (results weighted by retirement home size and region to reflect residents across Ontario) • 154 licensees (48 per cent of all licensees) • 49 other stakeholders (advocacy orgs, government orgs, ministries, administrative authorities, community partners) These results, including efforts to increase resident awareness to 35 per cent, will be considered as part of the RHRA's strategic planning process in Fiscal Year 2025/26.
Percentage of Service Standard Attainment (supports the objective to Enable Impact Through Operational Excellence)	Reflects the RHRA's commitment to delivering on its core mandate efficiently by measuring core regulatory processes against service standards (licence applications, inspections, reports of harm, and complaints).	The RHRA meets customer service standards for core regulatory processes 90 per cent of the time annually.	The RHRA fell below its target goal, meeting 75 per cent of the customer service standards relating to four core regulatory areas, falling short in complaint and proactive inspections. The number of mandatory reports has increased significantly (46 per cent), driving up the number of responsive inspections which are prioritized over routine inspections. To further improve service standards in complaints and proactive inspections, the RHRA will continue: • Encouraging the use of the Self-Service Portal and webforms to achieve efficiencies. • Recruitment and investment in front-line staff.

Percentage of Service Standard Attainment

Reflects RHRA's commitment to delivering on its core mandate efficiently by measuring core functions against service standards (licence applications, inspections, reports of harm, and complaints).



Service Standard Attainment are equally weighted between Licence Applications, Complaints, Reports of Harms and Proactive Inspections



Licence Applications: The RHRA exceeded its service level standards which are eight weeks for standard applications or two to four weeks for expedited applications.

Complaints: Complaints resolved by early resolution are measured by whether they are closed within 50 days, closed by inquiry within 70 days or closed by inspection within 120 days. Service standards were not met due to a continued volume of complaints, significant increase in mandatory report volume, complexity of concerns and available resources. Complaints work is reliant on other functions including inspections and enforcement which may also contribute to increased timelines.

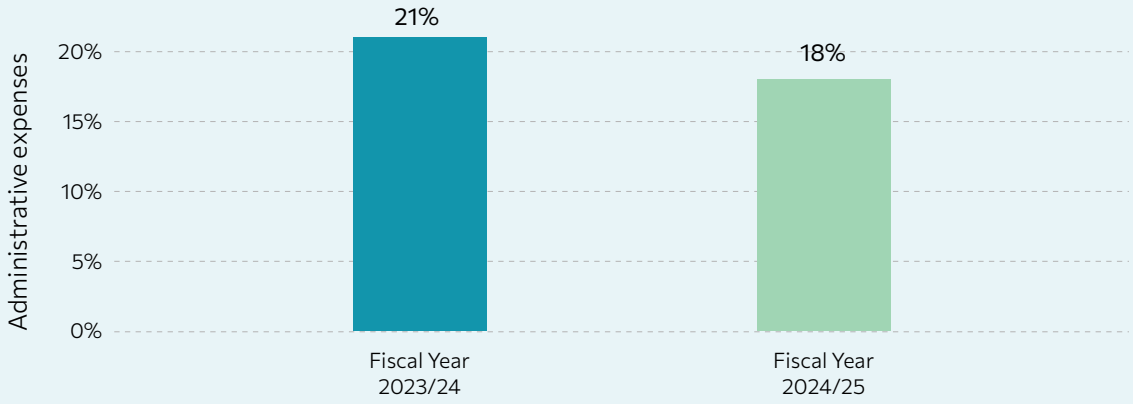
Reports of Harm: The RHRA exceeded its service level standards for processing reports of harm. Reports of harm are dealt with by a responsive inspection or inquiry depending on their nature. Reports of harm that can be resolved by inquiry are measured by whether they are dealt within 10 days of receiving the report. Reports of harm referred to inspection must be completed with three days. The RHRA saw a significant increase in reports of harm compared to the previous fiscal year.

Proactive inspections: The service standard for proactive inspections is to conduct 90 per cent of these inspections within 30 days of our internal target date. Service standards were not met due to significant increases in responsive inspections, which are prioritized over proactive inspections. Responsive inspections often relate to circumstances of greater risk that can ultimately contribute to reducing the time before re-inspection which contributes to challenges in completing all proactive inspections within the defined frequency.

Performance Measure	Additional Information	Target Structure	Outcomes
Operational Effectiveness & Efficiency (supports the objective to Enable Impact Through Operational Excellence)	Reflects the RHRA's commitment to minimizing administrative expenses as a per cent of total expenses over three-year period. The RHRA has updated its approach to allocating expenses and will establish an appropriate baseline in Fiscal Year 2023/24 to enable year-to-year comparison.	The RHRA established a baseline for administrative expenses as a percentage of total expenses and will maintain at or below this baseline of 21 per cent.	Target achieved. At March 31, 2025, administrative expenses were 18 per cent of total expenses.

Operational Effectiveness & efficiency

Reflects RHRA's commitment to minimizing administrative expenses as a percent of total expenses over three-year period.



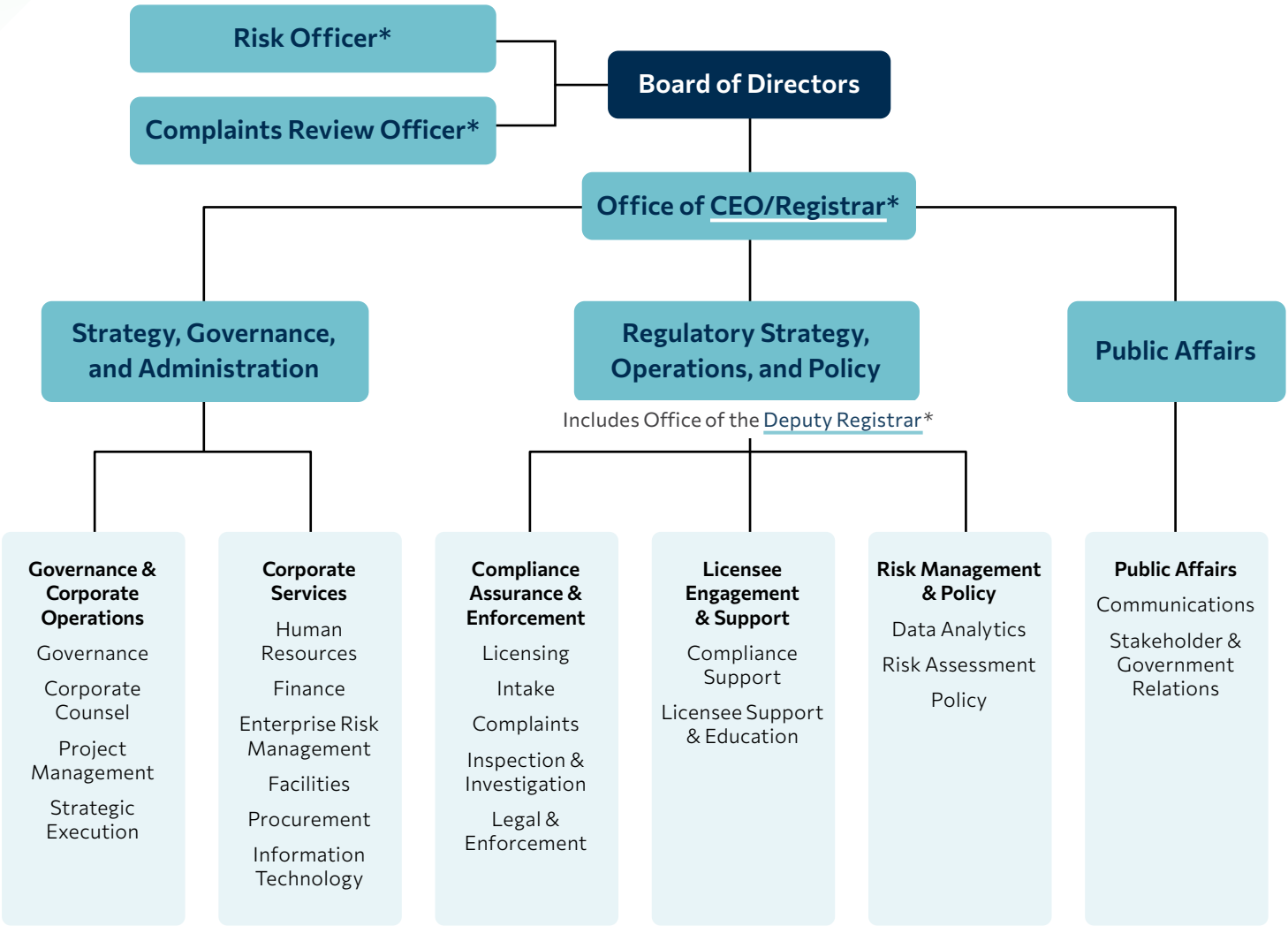
Performance Measure	Additional Information	Target Structure	Outcomes
Governance (supports the objective to Enable Impact Through Operational Excellence)	Demonstrates the RHRA's commitment to governance best practices and conducts independent governance reviews at minimum of every three years. The most recent review was completed in Q4 Fiscal Year 2022/23.	100 per cent of recommendations are addressed within 18 months of the review date. Independent governance reviews conducted at a minimum every three years.	In Fiscal Year 2024-25, the RHRA completed implementation of all recommendations made in a Governance Review by KPMG. Overall timeline was not met due to resource constraints among other operational challenges. An independent governance review is scheduled for Fiscal Year 2025/26.
Financial Sustainability (supports the objective to Enable Impact Through Operational Excellence)	Demonstrates the RHRA's commitment to prudent financial management while maintaining appropriate financial flexibility.	Operating expenses are within three per cent of budgeted operating expenses. Restricted reserves are within three to six months of budgeted operating expenses.	Target Achieved: Actual operating expenses ($14,254,452) were three per cent over budgeted operating expenses ($13,836,210) and restricted reserve was within three to six months of budgeted operating expenses (5.5 months).



Corporate Overview

Organizational structure

The RHRA is headquartered in Toronto with approximately 86 full-time equivalent (FTE) positions. Deployed across the province, the RHRA's workforce is dedicated to regulatory operations that licence, inspect and investigate complaints and reports of harm/risk of harm. The RHRA is self-financed primarily through annual fees paid by licensees ($14.59 per suite per month from April 1, 2024, to March 31, 2025).



** Independent statutory roles with specific duties and powers set out in the Act.*



Accountability and Transparency

Board and Governance

The RHRA is governed by a nine-person Board of Directors, including four members appointed by Order-in-Council and five members elected through a nomination process by the Board. The Board recognizes the importance of having Directors that reflect the diversity of Ontario. Board member profiles are available on the RHRA website.

The Board is accountable to the Minister for Seniors and Accessibility. The Minister designates the Board Chair from among the members of the Board.

Memorandum of Understanding

A Memorandum of Understanding (MOU), including its attached schedules, clarifies the roles, duties and responsibilities of the RHRA and the Government in relation to the administration of the Act.

Over the past fiscal year, the RHRA Board reviewed and/or approved changes to several policies and related documents:

- Procurement Policy was amended in June 2024.
  - Government had changed its procurement policy since the RHRA's last procurement policy was approved.
  - This required an equivalent change in the RHRA's policy.
  - Changes were made to the approval's numbers for some items and other minor edits.
  - The objective of these changes is to comply with the Government's procurement policies and, at a date in the future, to re-evaluate the policy.
- Delegation of Authority Policy was amended in February 2025.
  - Section 2.3 of the Delegation of Authority Policy was amended to more closely align the percentage with corresponding dollar equivalent as 3 per cent of aggregate operating expenses.
  - In addition, changes to authority/approval signing requirements to include alternatives to the Board Chair were made.
- Travel, Meal and Hospitality Expense Policy was amended in December 2024.
  - Eliminated the requirement for a mandatory vehicle rental over 200 km travel distance as it no longer corresponds to the most cost beneficial travel option.

- Board Committee Terms of Reference Policy was revised in February 2025.
  - The Committee approved revisions of the Risk Officer and Complaints Review Officer sections of Appendix 'A', the Governance, Regulatory Affairs and Nominations Committee's (GRANC's) Terms of Reference, in order to clarify their respective evaluation processes. The Committee also approved various formatting and grammar revisions.
- Board Role Descriptions Policy was amended in February 2025.
  - Amended the role and term of Vice-Chair of the Board and included a new section defining 'independent director'.

Board Responsibilities

The Board is responsible for corporate governance, regulatory oversight and guiding the development of the RHRA's Strategic Plan and priorities. Board members adopt best practices in governance and regulatory oversight and are committed to continually strengthening governance practices and oversight of the organization ensuring its public accountability. Governance and accountability information can be found on RHRA.ca.

The Board has five regularly scheduled meetings per year. It met more frequently in the past year to provide oversight of the RHRA's strategic and financial planning. Board activities are supported by the work of two committees:

- Governance, Regulatory Affairs and Nominations Committee
- Finance, Audit and Human Resources Committee

Information about the elections/appointment process of the Board, basic qualifications of the Board, and Code of Ethics is available on RHRA.ca.

Board Remuneration

The Board Remuneration and Administration Policy sets in place the following:

- The per diem rate for the Board Chair is $730.
- The per diem rate for all other Board Directors is $500.
- The Chair receives an annual retainer of $10,000, and the Vice-Chair and Board Committee Chairs receive an annual retainer of $5,000 for work done outside Board and Committee meetings. For the fiscal year 2024/25, total Board remuneration was $147,933.84.

Board compensation and expenses are reviewed annually by the Governance, Regulatory Affairs and Nominations Committee.

Board Members

Biographies for the Board of Directors is available on the RHRA's website.

ALEX YUAN
Board Chair | Re-appointed: February 2025

CHRISTINE OZIMEK
Board Vice-Chair (as of January 1, 2025) | Re-elected: December 2024

ANIL MATHUR
Board Member | Re-elected: June 2024 | Chair, Finance, Audit and Human Resources Committee

VALA MONESTIME BELTER
Board Member | Re-appointed: July 2023 | Chair, Governance, Regulatory Affairs and Nominations Committee

JONATHAN BOULAKIA
Board Member | Re-elected: September 2022

CARMINE DOMANICO
Board Member | Appointed: August 2023

JOHN GROE
Board Member | Term completed: December 2024

BARBARA KIELEY
Board Member | Re-elected: January 2024 | Vice-Chair term ended January 1, 2025

LEAH LEVESQUE
Board Member | Elected: January 2024

JOE VACCARO
Board Member | Appointed: December 2024

Independent Risk Officer

Another important channel for oversight is the role of the Risk Officer (RO). This statutory role reports to the Board and exercises an independent role requiring independent decision-making. Appointed by the Board and approved by the Minister, the RO is responsible for reviewing, monitoring and assessing the effectiveness of the RHRA's administration of the Act and regulations. This includes the RHRA's activities that relate to helping ensure that licensees meet the care and safety standards in the Act and respect the rights of residents.

Since Kevin McCarthy's appointment, he has provided his first report focused on a review of the status of all remaining recommendations from previous risk officer reports. This report was published in Fiscal Year 2024/25.

Independent complaints review mechanism

Appointed by and reporting to the Board, the independent Complaints Review Officer (CRO), Elyse Sunshine, is responsible for reviewing matters where a complainant is not satisfied by the Registrar's conclusion to take no further action relating to a complaint.

In Fiscal Year 2024/25, the CRO rendered decisions on fifteen matters, up from seven the previous year. Of the decisions rendered by the CRO, 87 per cent found the Registrar's or Deputy Registrar's dispositions reasonable and 13 per cent were referred back to the Registrar for fresh information or with a recommendation to further review the matter.

All requests for review by the CRO were made by residents or their families. The CRO reviewed an average of 3.1 concerns per complaint. Complainants requested a review relating to care that was not provided or not provided properly, communication between the retirement home and the complainant, disputes between multiple substitute decision makers for a resident, plans of care and assessments, pest control, and meals. These complaints also related to complex legal issues including allegations regarding credibility of witnesses and capacity of residents.

Complaints Review Officer	FY 2024/25	FY 2023/24	FY 2022/23
Referrals	13	8	9
Decisions rendered	15	7	4
Decisions upheld	13	5	0

External Reviews

Between 2020 and 2023, the RHRA was the subject of four external reviews. On an annual basis, the RHRA is also reviewed by the independent Risk Officer. The RHRA has made tremendous progress in addressing the reviews' recommendations:

- In March 2025, the RHRA reported to the Auditor General of Ontario on the implementation status of recommendations coming out of the December 2020 audit. In the months ahead, the RHRA will work with the Office of the Auditor General to finalize its reporting for public release by the Auditor General in December 2025. The RHRA will provide an update next year on this final reporting.
- In Fiscal Year 2024/25, the RHRA completed implementation of all recommendations made in a Governance Review by KPMG. As well, the RHRA implemented all but four (two joint with MSAA) recommendations from the KPMG Operational Efficiency Review. RHRA, together with the Ministry of Seniors and Accessibility (MSAA), are continuing to work on implementing the remaining recommendations.



Reducing Administrative Burden

Ongoing commitment to burden reduction for the sector while strengthening resident protection

The RHRA has continued to proactively explore ways to reduce the administrative burden for licensees through operational improvements and legislative recommendations while strengthening resident protection.

The RHRA provides ongoing advice to the MSAA on opportunities to reduce burden from legislative and regulatory requirements, or from other activities.

Licensee Portal and improved webforms for mandatory reports and complaints

The digital strategy will continue to guide the RHRA in harnessing technology to empower better decision-making and enhance operational efficiency. The RHRA is achieving this by leveraging technology to simplify interactions and streamlining the exchange of information with licensees, key stakeholders and the public.

The RHRA Self-Service Portal is a comprehensive online tool that allows licensees and operators to efficiently review information about their retirement home(s) and manage administrative tasks. This includes submitting applications, reporting harm or complaints, and making notices of change. The portal is designed to be user-friendly, providing a seamless experience from start to finish.

The portal does not require an account for residents or their families who wish to submit a complaint and/or mandatory report through a webform. These webforms contain improved user experience (e.g. plain language, larger font, etc.) and are integrated into the RHRA's IT system to achieve efficiencies through automation.

Reducing burden on licensees while achieving compliance

The RHRA's Compliance Monitor continues to reduce the burden on licensees who have had orders issued to them or who have had conditions imposed on their licence. The RHRA's Compliance Monitor achieves this by assisting licensees to find appropriate managers, consultants, and third-party educators, while supporting them to achieve and maintain compliance with the Act and regulation.

Reduced administration during crisis situations

To help reduce burden and provide support in crisis management situations, the RHRA's engagement with Ontario Health atHome and other community partners alleviates the home's need to facilitate additional meetings/calls, allowing the home to focus more time and energy on the residents and managing the situation on the ground.

Leveraging partnerships to support resident safety

The RHRA supports licensees and operators in compliance by promoting awareness of helpful resources and facilitating connections to partner organizations focused on safety and mental health.

This approach eases administrative burden by facilitating access – especially among smaller, independent homes who seek support from the RHRA – to resources and supports so they can spend more time caring for residents.



People, Technology and Culture

The RHRA recognizes the importance of investing in people, culture and technology to be an effective, efficient and modern regulator. These core enablers support the RHRA in fulfilling its mandate and achieving both its Strategic Plan and Business Plan objectives.

Diversity matters

The RHRA is committed to fostering a workplace environment that values staff development and professional growth, embraces diversity in all its forms, supports succession planning, and promotes high performance standards.

The RHRA acknowledges that, as the population of Ontario continues to age and become more diverse, it is important to apply a thoughtful equity lens to its work. The RHRA is committed to cultivating an exceptional culture that values inclusion, diversity, equity, accessibility and anti-racism. The RHRA has and continues to work to ensure that staff have the tools and training they require and are empowered to draw upon their own professional and lived experiences.

People matter

The RHRA's organizational structure (see page 55) enables the RHRA to carry out its public interest mandate effectively and efficiently.

The RHRA continues to develop its existing talent, implement a retention strategy to keep top talent, and strengthen its succession planning program to ensure organizational stability, continuity and flexibility in an evolving environment.

RHRA has continued to offer a range of training and development programs and workshops, including sessions on effective communication, conflict resolution, and the use of AI and technology to improve efficiency. Lunch and Learn sessions are also used to enhance information sharing across the organization and to support staff with coping and resilience strategies, particularly for those exposed to upsetting, difficult or sensitive information and situations due to the nature of their work.

Technology enables

As a maturing regulator, the RHRA has defined its digital strategy to modernize and improve how it interacts with licensees and serves the public interest. This strategy is a critical step in its journey to operational excellence—designed to streamline interactions with licensees and empower informed decision-making through the investment in technology. Over the past year, the RHRA advanced this vision with the launch of the Self-Service Portal for licensees and digital webforms for filing concerns. These tools were informed by licensee and resident feedback and makes interacting with the RHRA easier and more accessible. Further, these tools are integrated into the RHRA's IT systems, reducing manual tasks and improving administrative efficiency through automation.

The Self-Service Portal is a comprehensive online tool that allows licensees and operators to efficiently manage their administrative tasks. This includes submitting applications, reporting harm or complaints, and making notices of change. The portal is designed to be user-friendly, providing a seamless experience from start to finish. Residents, family members of a resident, or members of the public can use of the portal without an account if they wish to submit a concern to the RHRA.

Recognizing the variability of retirement homes across Ontario's urban and rural landscape, use of the Self-Service Portal was rolled out gradually among licensees with over 40 per cent of licensees onboarded – allowing the RHRA to better support licensees, mitigate disruption and incrementally achieve efficiencies. The RHRA will continue onboarding licensees in Fiscal Year 2025/26, as contained in the 2025/26 Business Plan.



Corporate Policies and Commitments

Changes made to the Act and regulations, the RHRA by-laws or policies during the fiscal year

The Code of Conduct for Compliance and Legal Personnel, a new requirement under the MOU, was finalized in Fiscal Year 2024/25. The Code of Conduct mirrors the Code of Ethics. It is a policy rather than a schedule to the MOU and was taken to the Governance, Regulatory Affairs and Nominations Committee (GRANC) in February 2025. It was brought to GRANC to inform them of the policy prior to it being sent to the MSAA for informational purposes.

The RHRA developed a number of policies and procedures this year to implement its Information Access and Privacy Code. These include internal guidance for staff, and an Information Access Review Procedure.

Complaints about RHRA staff conduct, policies and procedures

The RHRA has an Administrative Complaints Policy and an anonymous, third-party service for complaints/concerns about the conduct of its staff, policies and procedures, and/or the application of its policies and procedures. Complaints or concerns related to the administration of the RHRA may be formally written, verbal or anonymous. Both are acted on by the RHRA's staff to seek resolution.

A complaint or concern related to findings during an inspection are not Administrative Complaints.

Of the 42 administrative complaint submissions received in Fiscal Year 2024/25, two concerns involved inspector conduct and one concern related to inspector qualifications and process more generally. Successful remediation involved inspector coaching and facilitation with complainants.

The remaining 39 submissions related to retirement home operations and were forwarded to Intake for triage and follow up. In November 2024, further updates were made to RHRA's website to clearly identify appropriate paths to share concerns about the RHRA and retirement homes respectively.

The RHRA posts its Administrative Complaints Policy and other corporate policies, including the Code of Ethics, on its website, RHRA.ca.

Ongoing commitment to Equity, Diversity and Inclusion

The RHRA is committed to inclusion, equity and diversity working to attract and retain a diverse workforce and to promote an inclusive culture. The RHRA values the unique skills and experiences (professional and lived) that employees and Directors bring to the organization.

Ongoing commitment to accessibility

The RHRA is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We do so through staff training and by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws. This includes ensuring our workplace and employment practices are accessible to potential and current employees with disabilities and hosting an *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) compliant public website.

In Fiscal Year 2024/25, the RHRA received and provided support for two requests for assistance to complete complaint forms (computer/internet access, difficulty writing or seeing). For example, where complainants had difficulty accessing online forms, the RHRA's staff filled out complaint forms in conversation with the resident or their family.

Ongoing commitment to French language services

To support provisions within the Act, regulation and the RHRA's French Language Services Delivery Policy, the RHRA makes communications, information, notices, guidance and resources available in French through a dedicated website, rhra.ca/fr, where a French version of this Annual Report is available.

The RHRA is committed to providing French language services and responds to all requests for French services. There are 17 retirement homes in Ontario that have self-identified as French-speaking or bilingual.

Of the 7,839 inquiries received by Intake in Fiscal Year 2024/25, seven requested French language services (< 0.1 per cent of inquiries). Requests for French language services included support in responding to questions about retirement home operations and reporting concerns. Six of these requests were received from residents and one was received from retirement home staff. The RHRA responds to these requests by utilizing French-speaking intake staff and collaborating with French-speaking inspectors.

Staffing

The RHRA prioritizes having staff available who can communicate in both official languages with specific emphasis on those roles which interact directly with the public: Complaints and Client Services and Inspections (four inspectors are bilingual). The Enforcement/Legal Department also employs a bilingual Enforcement and Legal Operations Specialist who can communicate with licensees in French when required. Orders or other documents are translated and provided to licensees on request.

Website, information and public documents

All public documents, including information for operators and licensees, are available in French on the RHRA's French website. The RHRA's internal publication processes ensure web content is translated and published simultaneously, except in extenuating circumstances.

In addition:

- Inspection reports and enforcement orders are available in French upon request.
- The RHRA Update, an e-newsletter for operators and other stakeholders, is now bilingual.
- All brochures, informational pieces and posters for residents and the public are produced in French.



Enterprise Risk Management, Crisis Management and Business Continuity

The RHRA has developed a comprehensive Enterprise Risk Management (ERM) framework which identifies, evaluates, monitors and mitigates enterprise-wide risks which could impact the achievement of the organization's objectives and mandate.

Risks are based on the likelihood of occurrence and impact to the organization and outline the organization's risk tolerance. Management assesses these risks quarterly and the results are presented to the Board semi-annually.

In Fiscal 2024/25, the RHRA continued the substantial review and update of its Business Recovery and Business Continuity Plans (including its crisis communications strategy) so that its policies, procedures and protocols reflect the evolving environment and new and emerging risks, and provide a blueprint for getting critical functions up and running in the event of a crisis. This work included conducting a business impact analysis to help prepare for any crisis and resume operations in a timely manner and detailing the policies and procedures and key accountabilities to restore IT services and data in the aftermath of a disaster.

There were no occurrences of any risk(s) that required reporting of and implementation of the RHRA's Business Recovery and Continuity Plans in Fiscal Year 2024/25.



Financial Report

Overview

The RHRA is required to be a self-funded organization. Its Board oversees the RHRA to ensure it funds and fulfills its legislated responsibilities in a financially sustainable manner.

In Fiscal Year 2024/25, the RHRA updated its presentation of the year-end financial statements. In previous years, net investment income was reported as part of operating revenue. This past year, net investment income is being reported separate from and below operating revenue, an approach that supports financial management and transparent reporting.

Operating Revenue

The RHRA is funded through fees that licensees must pay to operate a retirement home in Ontario. Since 2012, RHRA has received an average of 73 per cent to 94 per cent of its funding from licensee annual fees at the beginning of the year and the remainder through application and other ancillary fees during the year. In Fiscal Year 2021/22 and Fiscal Year 2022/23, the RHRA received two grants from the Government of Ontario to enable COVID-19 crisis support ($5M) and support a modernized licenses database ($2.66M) that was implemented in the same year.

The RHRA's total operating revenue of $13.7M includes revenue from fees and recognition of the Ontario Government grant related to database amortization. For the year, there was growth in suites of 810, which is a 2.2 per cent increase over the previous year. Regular and expedited application revenue was higher than forecasted resulting from more transaction activity in the year. Revenue reflects the multi-year trend towards larger licensed retirement homes with more suites. Application fees contribute only five per cent of RHRA's fee revenue while annual fees contribute 93 per cent, the added application fee revenue compared to budget is marginal.

Compared to Fiscal Year 2023/24, operating revenue from annual fees increased by $904K or 7.7 per cent. Of this increase, 56 per cent or $506K was due to the increased fee, while 44 per cent or $398K was due to suite growth.

Operating Expenses

The RHRA incurred expenses to carry out its legislated duties and continue to strengthen its regulatory and operating capabilities. Employing staff with expertise in regulatory, public affairs, stakeholder engagement, and corporate functions consumes 77 per cent of the operating expenses. This includes staff assessing applications and issuing licences, conducting inspections, and managing inquiries, complaints, and enforcement of regulations; managing ministry, public and stakeholder inquiries and needs; and managing enterprise-wide business services, risk and governance support. Operational expenses include procurement of external resources for board-approved strategic projects, hybrid and collaborative workspace and tools, travel to inspect homes, legal guidance, and insurance.

Operating expenses were $14.3M. During the year, the RHRA added roles to address emergent declining service level metrics in key areas, specifically in the areas of intake, proactive inspections and complaints. Sustained multi-year trends in both responsive regulatory activity and the nature of that activity have continued to strain existing staff resources. Other expenses in strategic initiatives, such as professional fees for research and evidence gathering to inform its evidence-based and proportionate regulatory approach, were maintained as these are essential to remaining current with the regulatory environment. Investments in front-line staff involved in direct service provision have been critical to addressing responsiveness to regulatory concerns.

Operating expenses were 14 per cent ($1.8M) higher than last year. This reflected an additional $1.3M for staff to support key frontline regulatory functions and meet service standards. The balance relates to operating costs where despite year-over-year savings of $140K in administrative and legal expenses, costs for employment-related expenses (e.g. inspections travel, IT licences, telecommunications), translation, facilities, cyclical (e.g. triennial stakeholder survey) and strategic plan projects (e.g. website) netted an increase of $430K. An amortization increase of $80K accounts for the balance in increased expenses. In addition to meeting performance standards for the organization, some of these investments are the result of meeting obligations under the MOU.

Non-Operating Revenue and Expenses

The RHRA earns non-operating revenue from investments which can be estimated entering the fiscal year. Ultimately, it is unpredictable since, beyond investment choices, it is determined largely by economic and political factors external to the RHRA. This year, $930K in net investment income is attributed to both the exchange-traded funds (ETFs) and interest income outperforming expectations. Of the $930K in investment income, $569k (61%) was unbudgeted and interest income of $672K was nearly double the budgeted amount, resulting from realized interest when re-balancing the investment portfolio. All ETF income and close to half of the unbudgeted income is from unrealized gains in investment valuation as at year end, and is therefore subject to future variation.

Net Income

The RHRA ended the year with an operating loss of $585K, but an overall surplus of $346K resulting from net investment income of $930K.

Reserves

The Board determined it is prudent to maintain an operating reserve with a target of six months of anticipated operating expenses but with an acceptable range of three to six months. Maintaining reserves aligns with the RHRA's governing documents and common practices, enabling short-term cashflow and financial stability when fees collected do not cover all operating expenses. The Restricted Operating Reserve of $7.1M represents approximately 5.5 months of anticipated Fiscal Year 2025/26 expenses.

Net Assets

The RHRA's financial position remains stable with total net assets of $9.1M. It continues to operate with no unfunded liabilities and a solid liquidity position where current assets are 91 per cent cash and almost 1.3 times current liabilities. We implemented all but four (two joint with MSAA) recommendations from the KPMG Operational Efficiency Review. Sustained cost savings of approximately $162K were achieved in the past year related to the original KPMG recommendations. Legislation requires that the RHRA maintain an Emergency Fund which are funds held in trust for residents in specific circumstances. The RHRA also recorded revenue of $57K in administrative penalties that are required to be allocated to the Emergency Fund. Amounts in the Emergency Fund cannot be used for regular operations. At year end, 88 per cent ($8.0M) of the RHRA's total net assets are restricted for Emergency Fund and Restricted Operating Reserve.

Investments

The investment portfolio is managed according to the Board-approved investment policy. It includes a target mix of ETF investments designed to achieve optimum return while maintaining an overall low level of risk exposure. Total net investment and interest income for Fiscal Year 2024/25 was $930K, which includes both realized gains, interest and dividends and unrealized gains less bank fees, with realized and unrealized gains and losses based on market value of investment holdings.

Management's Responsibility for Financial Reporting

The RHRA's Management is responsible for the integrity, consistency, objectivity and reliability of the Financial Statements of the RHRA and related financial information as presented. Canadian accounting standards for not-for-profit organizations have been applied, and Management has exercised its judgment and made best estimates where appropriate. The RHRA's accounting system and related internal controls are designed, and supporting procedures maintained, to provide reasonable assurance that financial records are complete and accurate, and that assets are safeguarded against loss from unauthorized use or disposition.

The RHRA's Board of Directors oversees management's responsibilities for financial reporting. The Board has established the Finance, Audit and Human Resources Committee, composed of independent directors, to support execution of its fiduciary and financial oversight role. The Committee monitors the RHRA's system of internal controls over the financial reporting process, makes recommendations to the Board regarding the Board's appointment of the external financial auditor and reviews and recommends the financial statements for Board approval.

Deloitte LLP, the independent auditors appointed by the RHRA Board, audited the RHRA's Financial Statements as of March 31, 2025, and for the year then ended. Their report, which expressed an unmodified audit opinion, can be found at the end of this Annual Report. In addition, Deloitte LLP has full and unrestricted access to and meets periodically with FARHC to discuss their audit and matters arising, such as comments they may have on the fairness of financial reporting and the adequacy of internal controls.

Jay O'Neill
Chief Executive Officer and Registrar

Financial Statements

As at March 31, 2025

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Independent Auditor's Report

To the Board of Directors of the
Retirement Homes Regulatory Authority

Opinion

We have audited the financial statements of the Retirement Homes Regulatory Authority (the "Organization"), which comprise the statement of financial position as at March 31, 2025, and the statements of operations, changes in net assets, and cash flows for the year then ended, and notes to the financial statements, including a summary of significant accounting policies (collectively referred to as the "financial statements").

In our opinion, the accompanying financial statements present fairly, in all material respects, the financial position of the Organization as at March 31, 2025, and the results of its operations and its cash flows for the year then ended in accordance with Canadian accounting standards for not-for-profit organizations.

Basis for Opinion

We conducted our audit in accordance with Canadian generally accepted auditing standards ("Canadian GAAS"). Our responsibilities under those standards are further described in the *Auditor's Responsibilities for the Audit of the Financial Statements* section of our report. We are independent of the Organization in accordance with the ethical requirements that are relevant to our audit of the financial statements in Canada, and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of Management and Those charged with governance for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with Canadian accounting standards for not-for-profit organizations, and for such internal control as management determines is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is responsible for assessing the Organization's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Organization or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Organization's financial reporting process.

Auditor's Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with Canadian GAAS will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

As part of an audit in accordance with Canadian GAAS, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Organization's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- Conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Organization's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Organization to cease to continue as a going concern.
- Evaluate the overall presentation, structure and content of the financial statements, including the disclosures, and whether the financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

Deloitte LLP

Chartered Professional Accountants
Licensed Public Accountants
June 25, 2025

Retirement Homes Regulatory Authority

Notes to the Financial Position
As at March 31, 2025

	Notes	2025 $	2024 $
Assets			
Current assets			
Cash		**5,604,904**	3,158,947
Accounts receivable	2	**34,984**	26,941
Prepaid expenses		**368,074**	307,193
Harmonized sales tax receivable		**121,455**	105,040
		6,129,417	3,598,121
Long-term investments	3	**6,432,368**	5,865,338
Emergency fund restricted cash	10	**840,869**	777,860
Capital and intangible assets	4	**1,454,678**	1,716,024
		14,857,332	11,957,343
Liabilities			
Current liabilities			
Accounts payable and accrued liabilities	5 and 6	**4,781,875**	1,980,545
Deferred capital contributions	7	**857,167**	1,135,167
Deferred lease inducement	8	**117,124**	149,068
		5,756,166	3,264,780
Commitments and contingencies	11		
Net assets			
Unrestricted		**1,076,597**	990,198
Restricted - Emergency fund	10	**840,869**	777,860
Internally restricted	9	**7,183,701**	6,924,505
		9,101,166	8,692,563
		14,857,332	11,957,343

The accompanying notes are an integral part of the financial statements.

Approved by the Board

_____, Chair of the Board of Directors

_____, Chair of the Finance, Audit & Human Resources Committee

Retirement Homes Regulatory Authority

Statement of Operations
As at March 31, 2025

	Notes	Operating fund $	Emergency fund $ (Note 10)	2025 Total $	Operating fund $	Emergency fund $ (Note 10)	2024 Total $
Revenue							
Annual fees		**12,679,943**	**—**	**12,679,943**	11,775,593	—	11,775,593
Application fees		**711,850**	**—**	**711,850**	836,575	—	836,575
Administrative monetary penalties		**—**	**57,500**	**57,500**	—	54,700	54,700
Amortization of deferred capital contributions	7	**278,000**	**—**	**278,000**	254,833	—	254,833
		13,669,793	**57,500**	**13,727,293**	12,867,001	54,700	12,921,701
Expenses							
Salaries, wages and benefits		**10,817,990**	**—**	**10,817,990**	9,547,928	—	9,547,928
Operating		**3,010,150**	**—**	**3,010,150**	2,579,793	—	2,579,793
Amortization of capital assets		**426,312**	**—**	**426,312**	361,753	—	361,753
Payments from the Emergency fund		**—**	**31,362**	**31,362**	—	—	—
		14,254,452	**31,362**	**14,285,814**	12,489,474	—	12,489,474
(Deficiency) excess of revenue over expenses before the undernoted		**(584,659)**	**26,138**	**(558,521)**	377,527	54,700	432,227
Net investment income	3	**930,253**	**36,871**	**967,124**	735,257	37,047	772,304
Excess of revenue over expenses		**345,594**	**63,009**	**408,603**	1,112,784	91,747	1,204,531

The accompanying notes are an integral part of the financial statements.

Retirement Homes Regulatory Authority

Statement of Changes in Net Assets
As at March 31, 2025

	Unrestricted $	Restricted-Emergency fund $ (Note 10)	Internally restricted $ (Note 9)	2025 Total $	2024 Total $
Net assets, beginning of year	**990,198**	**777,860**	**6,924,505**	**8,692,563**	7,488,032
Excess of revenue over expenses	**345,594**	**63,009**	**—**	**408,603**	1,204,531
Interfund transfers	**(259,196)**	**—**	**259,196**	**—**	—
Net assets, end of year	**1,076,597**	**840,869**	**7,183,701**	**9,101,166**	8,692,563

The accompanying notes are an integral part of the financial statements.

Retirement Homes Regulatory Authority

Statement of Cash Flows
As at March 31, 2025

	Notes	2025 $	2024 $
Operating activities			
Excess of revenue over expenses		**408,603**	1,204,531
Items not involving cash			
Unrealized gains on investments	3	**(258,084)**	(231,540)
Amortization of capital assets		**426,312**	361,753
Amortization of deferred capital contributions		**(278,000)**	(254,833)
Amortization of deferred lease inducement		**(31,944)**	(31,942)
		266,887	1,047,969
Change in non-cash operating working capital			
Accounts receivable		**(8,043)**	68,020
Prepaid expenses		**(60,881)**	(856)
Harmonized Sales Tax receivable/payable		**(16,415)**	(36,006)
Accounts payable and accrued liabilities		**2,801,330**	437,564
Deferred revenue		**—**	(6,983,039)
		2,982,878	(5,466,348)
Investing activities			
Acquisition of capital assets		**(164,966)**	(173,339)
Net purchases and redemption of investments		**(308,946)**	(188,700)
Increase in Emergency Fund restricted cash		**(63,009)**	(91,747)
		(536,921)	(453,786)
Increase (decrease) in cash		**2,445,957**	(5,920,134)
Cash, beginning of year		**3,158,947**	9,079,081
Cash, end of year		**5,604,904**	3,158,947

The accompanying notes are an integral part of the financial statements.

The Retirement Homes Regulatory Authority ("RHRA") is responsible for the administration and enforcement of the *Retirement Homes Act, 2010* (the "Act"). The RHRA was established as a corporation without share capital under the Act. It is subject to the *Corporations Act* (Ontario) and, as a not-for-profit organization under the *Income Tax Act* (Canada), is exempt from income tax.

The RHRA's responsibilities include the licensing of retirement homes, enforcement of the care and safety standards for residents, and educating licensees, consumers and the public on legislative requirements and standards.

1. Significant accounting policies

The financial statements have been prepared in accordance with Canadian accounting standards for not-for-profit organizations under Part III of the Chartered Professional Accountants of Canada Handbook and include the following significant accounting policies:

(a) Fund accounting

The Operating Fund accounts for the RHRA's operating and administrative activities, and reports unrestricted revenues and expenses.

The Emergency Fund reports funds held in trust for the benefit of residents and former residents of retirement homes if the criteria for making a claim and payment are met.

(b) Investments

The RHRA's investments consist of fixed income GICs and exchange-traded funds. Investments are recorded at fair value on initial recognition. Subsequently, investments are recorded at fair value, with unrealized gains and losses reported in the Statement of operations.

Transaction costs related to investments are expensed as incurred.

(c) Capital and intangible assets

Purchased capital and intangible assets are recorded at cost. The cost of a capital or intangible asset comprises its purchase price and any directly attributable cost of preparing the asset for its intended use.

Leases that transfer substantially all the benefits and risks of ownership are capitalized.

Amortization is provided on the straight-line basis over the estimated useful lives of the assets at the following annual rates:

Equipment	25 per cent
Computer software	50 per cent
Computer hardware	33 per cent
Furniture and fixtures	20 per cent
Leasehold improvements	Remaining term of lease
Central IT system	20 per cent

Capital and intangible assets in progress are not amortized. Amortization of a capital and intangible asset commences in the month after it is brought into service.

1. Significant accounting policies (continued)

(d) Foreign currency translation

Monetary assets and liabilities denominated in foreign currencies are translated into Canadian dollars at the prevailing rates of exchange at the year-end date. Revenue and expenses are translated at the exchange rates prevailing on the transaction date. Realized and unrealized exchange gains and losses are included in the Statement of operations.

(e) Deferred lease inducement

Deferred lease inducement relates to a leasehold improvement allowance and is amortized on the straight-line basis over the term of the lease.

(f) Revenue recognition

Annual fees

Annual fees are recognized as revenue proportionately over the year to which they relate, net of amounts for which collectability is uncertain. The annual fee is due on the first day of the calendar year. Annual fees that are remitted quarterly are subject to a finance fee that is deferred and recognized over the periods to which the deferral relates.

Application fees

Application fees are recognized upon receipt of a completed application and after a preliminary assessment of the application has been performed.

Province of Ontario Grants

Operating grants received from the Province of Ontario are recognized in the period in which the events giving rise to the grant occur, any eligibility criteria and/or stipulations are met, and reasonable estimate of the amount can be made.

Capital grants received are deferred and amortized into revenue on the same basis as the related asset is amortized.

Contributions

The RHRA uses the deferral method of accounting for contributions.

Contributions received for capital assets are deferred and are amortized into revenue on the same basis as the related asset is amortized.

Investment income

Investment income is recognized as revenue when earned and is recorded on the accrual basis, and includes interest and dividend income as well as realized and unrealized gains and losses.

(g) Financial instruments

Financial instruments are financial assets or liabilities of the RHRA which, in general, provide the RHRA the right to receive cash or another financial asset from another party or require the RHRA to pay another party cash or other financial assets.

Financial assets and financial liabilities are initially recognized at fair value when the RHRA becomes a party to the contractual provisions of the financial instrument. Subsequently, all financial instruments are measured at amortized cost, with the exception of investments which are measured at fair value.

The fair value of the RHRA's cash, accounts receivable, and accounts payable and accrued liabilities approximate their carrying values.

(h) Use of estimates

The preparation of financial statements in accordance with Canadian accounting standards for not-for-profit organizations requires management to make estimates and assumptions that affect the reported amount of revenues, expenses, assets and liabilities as well as disclosure of contingent assets and liabilities in the financial statements and accompanying notes. Balances subject to estimation relate primarily to certain accrued liabilities and the useful lives of the various categories of capital assets. Actual results could differ from such estimates.

2. Accounts receivable

	2025	2024
	$	$
Accounts receivable	**23,514**	10,786
Interest receivable	**11,470**	16,155
	34,984	26,941

Accounts receivable are net of an allowance for doubtful accounts of nil (nil in 2024).

3. Investments

The RHRA's investment decisions are made in line with an Investment Policy approved by the Board, which is reviewed and updated periodically. The RHRA's investment objectives, in their order of priority, are to: 1. Preserve capital, 2. Maintain liquidity to meet operational and capital requirements, and 3. Maximize the rate of return.

Investments consist of cash held in the investment portfolio account, and exchange-traded funds.

	2025	2024
	$	$
Long-term investments		
Cash in investment account	**20,202**	19,682
Exchange-traded funds	**6,412,166**	5,845,656
	6,432,368	5,865,338

The composition of net investment income for the year is as follows:

	2025	2024
	$	$
Realized gains, interests and dividends	**310,441**	217,069
Bank interest	**406,613**	332,120
Unrealized gains during the year	**258,084**	231,540
	975,138	780,729
Less: bank fees	**(8,014)**	(8,425)
	967,124	772,304

4. Capital and intangible assets

	Cost $	Accumulated amortization $	2025 Net book value $	2024 Net book value $
Equipment	**31,304**	**31,304**	**—**	—
Computer software	**128,204**	**109,939**	**18,265**	35,730
Computer hardware	**254,524**	**193,944**	**60,580**	32,580
Furniture and fixture	**128,258**	**128,258**	**—**	—
Leasehold improvements	**704,512**	**446,191**	**258,321**	328,772
Central IT system	**1,715,099**	**597,587**	**1,117,512**	1,318,942
	2,961,901	**1,507,223**	**1,454,678**	1,716,024

During the year, the RHRA disposed and wrote off fully depreciated capital and intangible assets with an original cost of nil ($628,260 in 2024).

5. Government remittances

As at March 31, 2025, the RHRA had nil in government remittances payable ($28,916 in 2024).

6. Customer advances

Annual fees received relating to the periods after the current fiscal year are recorded as a liability and included in accounts payable and accrued liabilities. Commencing January 1, 2024, annual fees are billed in line with the fiscal year. As at March 31, 2025, RHRA had $3,323,286 in customer advances ($147,332 in 2024).

7. Province of Ontario grant

Grant funding received from the Province of Ontario consisted of both operating and capital funding for the purpose of carrying out an IT infrastructure project. Subsequent to April 1, 2023, no further operating grant amounts were recognized under this funding. The continuity of deferred capital contributions is as follows:

	2025 $	2024 $
Deferred revenue and deferred capital contributions from Province of Ontario grant, beginning of year	**1,135,167**	1,390,000
Less: amounts recognized as revenue during the year	**278,000**	254,833
	857,167	1,135,167
Portion related to deferred capital contributions, end of year	**(857,167)**	(1,135,167)
	—	—

8. Deferred lease inducement

Deferred lease inducement relates to a leasehold improvement allowance received from the landlord for the renovation of the leased office premises. The original amount of the inducement was $319,429 and is being amortized on the straight-line basis over the term of the lease. As at year end, accumulated amortization amounts to $202,305 ($170,361 in 2024).

9. Internally restricted net assets

The RHRA has two types of restricted net assets: an internally restricted operating reserve and an externally restricted emergency fund reserve (Note 10).

The RHRA created an operating reserve for operating expenses for the purposes of accumulating funds that are available when needed due to unforeseen operating shortfalls.

On December 14, 2022, the Board approved a policy for sustaining an operating reserve equal within a target range of three to six months of normal annual operating budget expenditures, and a process for allocation from unrestricted net assets.

Over three quarters of internally restricted operating reserve funds are invested in long-term investments (Note 3).

10. Emergency fund

The Emergency fund was established in 2013 pursuant to the Act. Funds are held in trust for the benefit of residents and former residents of retirement homes in respect of any claims relating to certain events if the criteria for making a claim and payment are met. All administrative monetary penalties collected by the RHRA must be paid into the Emergency Fund pursuant to the Act. The Emergency fund is a legislatively restricted net asset and cannot be used for the RHRA's operations under any circumstances but must be presented as a net asset on the Statement of financial position.

The transactions and balance in the Emergency fund are as follows:

	2025 **$**	2024 $
Opening balance	**777,860**	686,113
Administrative monetary penalties	**57,500**	54,700
Interest income	**36,871**	37,047
	872,231	777,860
Less: claims/payments made	**31,362**	—
Closing balance	**840,869**	777,860

11. Commitments and contingencies

Lease obligations

Future payments relating to leased office premises, for future years until expiry of the lease in fiscal 2029, are as follows:

	$
2026	438,757
2027	457,038
2028	470,575
2029	412,042
Total minimum lease payments	1,778,412

12. Risk management

The investments held by the RHRA are exposed to a variety of financial risks. The RHRA seeks to minimize the potential adverse effects of these risks by regularly monitoring the investment's position, market events and the diversity of the long-term investment portfolio within the constraints of the RHRA's Investment Policies.

Significant risks that are relevant to the RHRA's investments are as follows:

Financial risk management

The RHRA is subject to market and interest rate risks with respect to its long-term investments. The RHRA's intention is to hold for long-term investment purposes, rather than short-term trading, therefore as of March 31, 2025, the RHRA did not hold any short-term investments.

Market risk

Market risk arises as a result of trading in equity securities (exchange-traded funds). Fluctuations in the market and interest rate expose the RHRA to the risk of loss. There have been no changes to the RHRA's risk exposure from 2024.

To manage its market risk, the RHRA has established investment policies which include target mix of investment types and concentration limits designed to achieve the optimum return within reasonable risk tolerances.

Credit risk

Credit risk is the risk that one party to a financial instrument will fail to discharge an obligation and cause the other party to incur a financial loss. The RHRA is subject to credit risk with respect to its accounts receivable. The balance of accounts receivable on the Statement of financial position represents the RHRA's maximum exposure at March 31, 2025. The RHRA manages this risk through proactive collection policies.

Financial liabilities

Liquidity risk

The RHRA's objective is to have sufficient liquidity to meet its liabilities when due. The RHRA monitors its cash balances and cash flows generated from operations to meet its requirements.

As at March 31, 2025, the most significant financial liability is accounts payable and accrued liabilities and it is management's opinion that the RHRA is not in default of any terms of its financial liabilities.

There have been no changes to the RHRA's risk exposures from the year ended March 31, 2024.

13. Indemnification of directors

The RHRA has indemnified its past, present and future directors against expenses (including legal expenses), judgments and any amount actually or reasonably incurred by them in connection with any action, suit or proceeding in which the directors are sued as a result of their service, if they acted honestly and in good faith with a view to the best interest of the RHRA. The nature of the indemnity prevents the RHRA from reasonably estimating the maximum exposure. The RHRA has purchased directors' liability insurance with respect to this indemnification. The directors of the RHRA are not aware of any threatened or actual proceedings.

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