Risk Officer Recommendations Implementation Report

Introduction

The Retirement Homes Regulatory Authority (RHRA) Risk Officer (RO) is required to review and assess annually the effectiveness of the RHRA's administration of the Retirement Homes Act, 2010 and the regulations, including the RHRA's activities and proposed activities. To that end, the RO prepares an annual report with recommendations.As part of its accountability to the public, the Board of Directors and the Ministry for Seniors and Accessibility, and in order to increase its transparency, the RHRA provides below a report on the status of each RO recommendation implementation. Included in this report is the original RO recommendation and the year in which it was made, the current status (complete, partially complete, in progress or pending) and the targeted time frame to phase in the recommendation. "Partially complete" means at least one part of RHRA's planned action for the recommendation is complete, but the action is not yet fully addressed. "In progress" means RHRA action is in process of being implemented to address the recommendation but more action is still needed. Provided as well is a summary of progress made to date. To view the RHRA's complete response to each recommendation, please refer to the relevant RHRA Response to Risk Officer report for the relevant year (linked on the Risk Officer webpage - https://www.rhra.ca/en/about-rhra/risk-officer/). The "Planned Completion Date" is not applicable for recommendations that were complete at the time of each past RO Report - these are marked as n/a. In making this information public, the RHRA strives to continue to improve the safety and protection of retirement home residents and support the work and effectiveness of the RO.
Fall 2025

RO Report Year	RO Comment/Recommendation	Current Status	RHRA Response	Planned Completion Date
2014-15	1. The Retirement Homes Regulatory Authority's strong commitment to effective regulation for resident protection is evident and considerable efforts were made in the development and implementation of its initial risk-based licensing framework. The initial criteria for licensing focused on anticipated risks to residents, and while applications were largely based on self-declared and corporate information, over 200 site visits were conducted by the Authority as a means to confirm initially anticipated risk levels. Routine inspections began in the fall of 2014 and as the inspection process continues to mature, it is recommended that, going forward, the emphasis be put on gathering evidence that a retirement home will and does operate safely, effectively and according to RHRA standards.	complete	The RHRA continues to gather evidence through proactive and reactive inspections, community partners and collaboration with other regulators to identify homes that may not be operating in accordance with the *Retirement Homes Act, 2010* . Inspection information is used in the RHRA risk model to identify homes with a higher risk of not operating in a safe manner for residents. Compliance assistance modules (CAM) have been developed for complaint handling, emergency plans, behaviour management, assessments and plans of care, as well as infection prevention and control, in order to clarify compliance requirements and expectations for operators.	n/a
2014-15	2. Criteria approved for risk-based licensing have been consistently applied in initial licensing applications; the Authority's risk-based ratings scale, described in this report and, based on the criteria in the framework, was also applied consistently.	complete	no further action required	n/a
2014-15	3. Inspections were carried out in the first year following the initial licensure process, in a timely fashion. Corrective action/plans that may have been requested during the initial licensing process were reviewed and verified, giving rise to changes to initial ratings. Where changes were made respecting ratings, I found the rationale to be clear and appropriate.	complete	no further action required	n/a

2014-15	4. It is recommended that the Authority continue to collect as much data and information as practical from its licensing, inspections and complaints areas to determine key trends- so that future policies, procedures, legislative or regulatory amendments are grounded in evidence that is supported by data collected and to provide a means to measure the effectiveness of regulatory activities.	complete	One of the RHRA's strategic goals is to make informed decisions based on data. The RHRA has taken steps such as building its risk model based on evidence. Since 2018, the RHRA has been using harms data gathered from inspections to drive its risk model. This data also informs the roll out of RHRA compliance standards and compliance assistance modules.	n/a
2014-15	5. All third parties who have a role respecting oversight or other involvement in retirement homes should be identified (TSSA, ESA, CHATS, Public Health, Fire Departments, Health Regulatory Colleges are examples) and it is recommended that the RHRA review these respective 'accountability chains' to identify 'gaps' and how these may be addressed to reduce potential for regulatory and reputational risk.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2014-15	6. It is also recommended that current provisions within the Act and regulation be reviewed to identify areas, such as the two examples identified above, where the RHRA's authority and its ability to most effectively protect the residents of licensed retirement homes could be strengthened to enhance its regulatory effectiveness and also mitigate potential for risk.	complete	see 2014-15 Recommendation 5 above for details	n/a
2015-16	1. The Risk Officer noted that in a matter that the RHRA unsuccessfully appealed to the Information and Privacy Commissioner (IPC), the RHRA was unable to gain access to information it had requested of police under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA). The request was declined because police have discretion whether or not to disclose, and the RHRA is not a designated institution under the MFIPPA. The Risk Officer stated that non-disclosure of such information to the RHRA may create risk to other residents, as well as to the RHRA.	complete	The RHRA has reviewed and made recommendations to the Ministry for Seniors and Accessibility related to information sharing and relevent resitrictions. Further recommendations will be made if necessary. RHRA has established two programs (unlicensed homes monitoring initiative; and partnerships and engagement program) with a view to building relationships with these regulatory oversight bodies. These programs also will aid in ensuring continuity of resident protection. In addition, RHRA continues to seek clarity through government to identify gaps in oversight with subsidized beds. Liaising with other regulatory entities is currently incorporated into routine activities in the partnership and engagement function.	n/a
2015-16	2. The Risk Officer noted that the prevalence of dementia appears to be increasing amongst the older population. As dementia is considered a contributing factor for exit-seeking behavior, resident-to-resident violence and other problematic behaviors in retirement homes, a shift in attention to these trends may be warranted in the routine inspections process. Further, the Risk Officer indicated there may be an opportunity for the RHRA to proactively collect and utilize details about these kinds of incidents, to better identify and mitigate risk to residents.	complete	Through the RHRA's harm tracking initatives, the RHRA is able to assess where severe harms are likely to occur due to non-compliance. Behaviour management is one of the RHRA's top five areas of concern. The risk model is updated annually, informed by the harms data. This ensures that the risk model continues to focus on areas of concern. Furthermore, the data drove the development of the behaviour management compliance standard and compliance assistance module in 2020.	n/a

2015-16	3. The Risk Officer indicated that all homes should ideally be required to determine, before accepting a resident, whether or not they would be able to provide the level of care needed, or to deal appropriately with possible behaviors. However, the Risk Officer also noted that current privacy and confidentiality provisions may present a barrier to mandating such assessments without a requirement for consent.	complete	The RHRA's Assessments and Plans of Care Compliance Assistance Module (CAM) was completed and made public on the RHRA website as of May 1, 2019.	n/a
2015-16	4. The Risk Officer commented that in reviewing inspection files, she did not see any policies to promote zero tolerance of abuse and neglect that defined any actual practices, actions or steps that must be taken by homes to anticipate and prevent such incidents; but also that this is not a current requirement. In the mock inspection, the Risk Officer did not observe the inspector looking beyond written policies to determine what steps are actually in place to mitigate the potential for such risks. She did note that inspectors generally look to the behavior management strategy and also check on the requirements for analysis of all incidents of abuse or neglect and annual evaluations of the home's policy.	complete	no further action required	n/a
2015-16	5. The Risk Officer noted that a potential risk for seniors may arise in homes that are licensed as retirement homes but also house other residents, such as individuals with pre-existing history or conditions (e.g., mental illness). It is possible that some seniors may choose not to enter or remain in a home if they understood it to be a mixed-use home.	complete	no further action required	n/a
2015-16	6. The Risk Officer discussed the RHRA's review and revision of its risk framework, and concluded that the steps the RHRA is taking towards continuous quality improvement in its inspection program are appropriate and should strongly enhance its effectiveness in ensuring resident safety and protection.	complete	The RHRA implemented a revised routine inspection program in 2019, which now focuses on a home's implementation of policies, procedures and implementation of care requirements. While in the home, inspectors spend more time on observations and interacting with staff and residents, rather than on document review. Inspection focus areas will continue to evolve based on information gleaned through the risk framework.	n/a
2015-16	7. The Risk Officer reviewed the RHRA's efforts, through orientation and ongoing training, to improve "inter-rater reliability" amongst the inspectors to ensure greater reliability and consistency in results. The Risk Officer suggested an additional possible approach, of having at least two inspectors objectively and independently inspect the same home and then compare and discuss results as a learning exercise to determine where differences exist and why.	complete	The RHRA produces monthly evaluation reports from routine inspections and compliance standards. These reports are used to assess "inter-rater reliability" among inspectors. These are reviewed regularly on a quarterly basis.	n/a
2015-16	8. The Risk Officer noted that when corrective action(s) are required following a routine inspection, the inspection report does not always note a timeframe in which the corrective action is expected to be taken. The Risk Officer also commented that it is important that inspection reports ready for posting on the public register include information that is consistent and meaningful to all.	complete	In May 2023, RHRA implemented a new inspection report. The report increases transparency and is more informative to the public. Further changes may be undertaken in the future as part of continuous improvements and we receive feedback on the current report.	n/a

2016-17	A valid and defensible plan to ensure the sufficiency and financial viability of the Emergency Fund for years to come should be developed and approved by the Board as soon as possible. The Board could, respectfully, consider a two-step process, as follows:	complete	see details below	n/a
2016-17	1. Establish a funding target based on the appropriate expertise. The figures and data respecting payments and the nature of events leading to payments over the past three years since enabling legislation came into being would be useful in assisting the Board in determining what the desired full funding target should be. It is recommended that the Board set a funding target as early as possible in 2017.	complete	no further action required	n/a
2016-17	2. Establish a plan to get to the desired target. The Board already has considered the proposed options that are listed above. The RHRA might, in future, consider development of a guideline/proposal to homes with respect to what EEI policies should include, for consistency.	complete	In 2016, the RHRA developed a guideline to support retirement home compliance of Act requirements related to extra expense insurance coverage. Further RHRA work on extra expense insurance will be completed by 2022 in response to a related recommendation contained in the Auditor General of Ontario's December 7, 2020 report.	n/a
2016-17	Although it is a requirement under s.5.1 (2.1) of the regulation that every licensee of a retirement home shall, at all times, maintain in full force and effect EEI from an authorized insurer, there was, in my view, a relatively high degree of non-compliance in 2015-16 among operators/licencees in providing requested evidence of current and paid up EEI policies to the RHRA. Outstanding EEI certificates for over 300 operators/licencees in 2016 prompted the Authority to initiate its Extra Expense Insurance Automation Project.*(see note below) Note: The Authority has pro-acted to explore ways to increase levels of compliance. Since the summer of 2016, RHRA has undertaken two new projects to improve both compliance and stakeholder outreach. The objective of the Email and Extra Expense Insurance Automation Project is to achieve greater corporate automation to streamline and enhance compliance and the Authority's communications.	complete	no further action required	n/a
2017-18	A further overlapping strategy for evaluation and continuous quality improvement will include an evaluation framework to measure and assess the impacts of risk informed decision-making; assess relationships between identified harms and ratings for risk; support a process for evaluation and reporting of results through public scorecards.	complete	Since the RHRA launched its risk model in 2017, the RHRA has been conducting annual reviews and updates to refine the methodology and incorporate more data. At launch, the risk model was based on scores derived from expert opinion on the severity of non-compliance with each section of the *Retirement Homes Act, 2010* and Regulation. In 2018, the RHRA incorporated harms data and shifted to an evidence-based risk score. In 2019, the RHRA began incorporating other risks, such as extra expense insurance and inherent risk for newly licensed homes.	n/a

2017-18	RHRA's decision to organize external peer review of the process by an esteemed panel of international experts is a further step in the right direction. The ultimate goal of the Risk Framework and associated strategies is to move from a system focused on harms reduction to one that is focused on improving the quality of life for resident of retirement homes in Ontario.	complete	no further action required	n/a
2018-19	1. Revise the 'invitation package' and enhance robustness to clearly define the purpose of the Compliance Support program ("CS Program"), how it connects with regulatory obligations and the support which will be made available through the CS Program. The package should also include program timelines, activities which are excluded, as well as other relevant information pertinent to the participation of the home; all of which should be provided in a user-friendly format. This recommendation will help decrease confusion at the outset and should help increase the acceptance rate into the CS Program.	complete	A new compliance support introductory letter to licensees and worksheet has been developed, which addresses the areas outlined in the Risk Officer's recommendation.	n/a
2018-19	2. Continue developing interpretive standards and creating a user-friendly online education presence. This enhanced library of information can be a starting point for Compliance Support program ("CS Program") participants to help rectify noted issues / concerns. This 'self-help' enablement would also decrease the dependency on CS Program staff and reduce length and frequency of contact with CS Program staff. This approach may allow the CS Program to support additional homes without a further need for additional staff. This continued focus on education also aligns with RHRA's mandate as noted within the Act (i.e. Part II, 16(b)).	complete	The RHRA has completed and made available on the RHRA website the following Compliance Assistance Modules (CAMs): Complete: Assessments and Plans of Care (May 1, 2019) Complete: Emergency Planning Manual (Oct. 3, 2019) Complete: Behaviour Management (Dec. 14, 2020) Complete: Complaints (Dec. 4, 2019) Complete: Infection Prevention and Control (IPAC) (April 1, 2021) A CAM on zero tolerance of abuse and neglect is planned for the future.	n/a
2018-19	3. Re-evaluate the imposed 'cap' and provide flexibility for inviting homes into the Compliance Support program ("CS Program"). The additional time commitment on CS Program can be mitigated if other recommendations within this report are also implemented (e.g. additional online self-help).	complete	The compliance support program was suspended in order to focus resources on COVID-19 pandemic management. As crisis management activities decrease the compliance support program work increases. There is no longer a 'cap', however scope of activity is dictated by available resources and prioritized based on risk. Future interruptions in the program may occur based on future crisis activities.	n/a
2018-19	4. Based on specific criteria, the RHRA should consider offering the Compliance Support program ("CS Program") to all higher risk homes despite being a new or transferred licensee. For example, if ownership of a high-risk home is transferred, there may be a case to offer the CS Program to the new licensee given previous findings. This approach will help newly licensed homes improve compliance from the outset, which in-turn may reduce inspection findings and help establish a strong relationship with the new licensee / home.	complete	Compliance support is currently including newly licensed operators where the RHRA identifies that the home could benefit from the program shortly after being licensed. Criteria has been developed and has been integrated into existing policies.	n/a

2018-19	5. For participants in the Compliance Support program (“CS Program”) with a common licensee, consider elevating the support and related discussions to the licensee, as opposed to providing support only at the individual home level. This approach will help ensure a licensee with multiple homes is able to address concerns across all owned homes and improve regulatory adherence. This top-down approach will also help the RHRA further build collaborative relationships with both the operators and licensee.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2018-19	Other Observations/Comments The Compliance Support program (“CS Program”) is currently evaluated / monitored using two key indicators, namely: participation rate and improvement in inspection findings post CS Program support. The participation rate indicates a willingness of an operator to work with RHRA to improve their adherence with the Act, while the post support review helps evaluate the effectiveness of an operator’s ability to benefit from the CS Program. Both of these statistics provide evidence (at least infer and provide some correlation) of the CS Program’s effectiveness and should continue to be monitored.	complete	Participation rates in compliance support and a post support review is continuing. If a home refuses compliance support, a voluntary survey is sent to better understand the barriers the licensee faces to entering the program. Enhancement of metrics beyond the measures outlined in the risk officers recommendation are part of ongoing quality improvements to program evaluation.	n/a
2018-19	Other Observations/Comments Discussions with operators during the course of the review revealed an overall sense of satisfaction of the Compliance Support program (“CS Program”) and ability to receive guidance / feedback from RHRA staff. Some positive feedback also came from operators who did not see an immediate positive impact of the program or who did not participate in the CS Program. These discussions and feedback are a testament to the CS Program itself and CS Program staff.	complete	Ongoing training with the compliance support team is undertaken with the development of each compliance assistance module and other compliance materials. Collaboration between compliance support, compliance monitoring, enforcement and inspections ensures each area is evaluating compliance and issuing the same guidance. Learnings for the pending compliance support participation surveys will be incorporated in improving the program and training.	n/a
2018-19	Other Observations/Comments Each home has ultimate accountability to meet the obligations noted within the Act. The Compliance Support program (“CS Program”) has been designed to support homes better understand their obligations and support their efforts in meeting the Act, however the CS Program (and RHRA) should not directly undertake activities on behalf of homes. For example, if a home has not met a policy-based requirement, the CS Program can help clarify specific requirements and provide feedback on draft policies, however should not draft the policy for the home. There is a fine line which, if crossed, could impair the integrity of the CS Program. In discussions with various stakeholders this specific topic was addressed in an attempt to understand whether the CS Program was potentially over-stepping its bounds. I am pleased to note that CS Program staff have been very vigilant. I encourage RHRA to continue training staff to ensure they are aware of the boundaries of support within the mandate of the CS Program.	complete	The RHRA will continue to ensure RHRA staff have the necessary training to understand the intent and boundaries of the of the compliance support program.	n/a

2019-20	1. Consider developing 'internal use only' service level targets for the Complaints Process. The targets should be based on an assessment of risk and complexity of each type of complaint as these variables significantly impact the time required to complete the various phases of the Complaints Process. These internal targets will, in-part, help RHRA management assess resource needs and manage complainant expectations with regard to turnaround times.	complete	Development and implementation of service level targets for complaint handling has been completed and will be re-evaluated annually. These internal targets measure timelines based on methodology for closing the complaint and are reflective of the complexity of the complaint itself. External Service level targets were published in September 2022 on the RHRA website and how the RHRA is measuring against those targets will be published in April 2023. Enhancing internal metrics are part of regular quality improvements to measure program effectiveness and efficiencies.	n/a
2019-20	2. RHRA should consider opportunities to work with the operator / home and complainant to mediate both complaints that contravene the Act and those complaints that do not contravene the Act. Mediation should focus on trying to resolve those issues for which the complainant has already endeavoured to resolve the issue through the home's Complaints Process. This suggested approach also ties back to subsection 84(3) of the Act, which affords the Registrar to, amongst other actions, attempt to 'mediate or resolve the complaint'.	complete	RHRA currently works with the home and complainants to try to resolve issues through early resolution, where appropriate. This is a formal process agreed upon by each party and outlined in procedure documents.	n/a
2019-20	3. Formalize guidelines for which the complainant is contacted on regular intervals throughout the Complaints Process. This will help complainants feel as though their concerns are being appropriately reviewed and will in-turn reduce their anxiety and frustration. This proactive outreach may require additional resource time; however, it will increase complainants' satisfaction of the Complaints Process.	complete	Revised complaints process guidelines have been completed. The process includes standardized touchpoints with the complainants to ensure they are well informed throughout the process.	n/a
2019-20	4. Consideration should be given to enacting a Deputy Registrar who, at minimum, is able to make decisions on certain complaints. Parameters should be developed which guide the types of complaints on which the Deputy Registrar can opine. This analysis should take into account, amongst others, the risk and complexity of the complaint. This suggestion may also help improve the turnaround time for some types of complaints given the shared workload between the Registrar and Deputy Registrar. It should be noted that section 23.1 of the Act allows for the RHRA Board of Directors to appoint a Deputy Registrar.	complete	The Deputy Registrar position is now in place and the scope of what can be delegated is complete. The Deputy Registrar is reviewing complaint decisions and determining outcomes.	n/a
2019-20	5. Consideration should be given to whether anonymous complaints, based on credibility and a risk analysis, should be followed-up. This may include, reaching out to the complainant or inspecting a home. Depending on the particulars of an anonymous complaint, there also may be an opportunity to re-direct the issue to another process within the RHRA (e.g. tips).	complete	RHRA continues to work with complainants who wish to remain anonymous to try and address their concerns outside of the formal complaints process. This may be by way of the mandatory report process, depending on the allegation, or by finding another satisfactory alternative solution, such as following up during the next routine inspection.	n/a

2019-20	6. Develop parameters to guide how complaints are pursued in those situations where the complainant is, or has become, non-responsive. This should include an assessment of risk and complexity of the complaint. This will help alleviate some resource constraints, while still allowing the RHRA to focus on those complaints which are higher risk.	complete	RHRA agrees with this recommendation. The procedure on how these situations will be handled are part of the complaints improvement work that has been completed.	n/a
2019-20	7. Evaluate opportunities to incorporate the contextual feedback from complaints for the benefit of consumers, in addition to assessing how the Complaints Process can inform the broader risk assessment of an operator or home. Both of these recommendations help to better meet the Fundamental Principle of the Act, which includes ensuring residents live 'in security, safety' and 'can make informed choices'. Furthermore, RHRA should consider the value of including information obtained during the Complaints Process to inform educational outreach.	complete	Annually, RHRA works to enhance its risk model with new data sets. As part of the annual refresh, RHRA has reviewed complaints data and mandatory report inquiries. To better inform the public, information has been added to the complaints section of RHRA website to include the top 5 concerns we receive formal complaints about, the number of formal complaints RHRA receives as well as the timeline targets and how RHRA measures against those timelines. RHRA is now using the new case management system to better capture the concerns being reported and root causes to better inform operational focus areas and greater information for the public.	n/a
2019-20	8. Enhance the ease of use in relation to the Complaints Process. In particular, consider developing a more robust 'self-help' online presence which consumers can use as an initial tool to help resolve their issue. This approach would help guide consumers as to how their concerns could best be resolved and may eliminate some of the complaints which are submitted to the RHRA. Privacy and consent would have to be considered, but the RHRA may also consider whether there is an opportunity to refer individuals to relevant 3rd parties which can better address their concerns / issues (e.g. relevant health college for Regulated Health Professionals). Additionally, the RHRA should consider how complaints can be submitted via various channels, including phone and other electronic means. It is acknowledged that for legal purposes this initial intake may require a subsequent written consent form.	complete	RHRA has included messaging on how to submit a complaint in its communications campaign as of September 2020. Information about complaints on the RHRA website has been edited for clarity. As well, a new, plain-language complaint form was implemented in March 2021, allowing for enhanced user functionality and understanding of the complaints process. RHRA recognizes the importance of removing barriers to access for complainants who are referred to other regulatory bodies and has provided advice to the Ministry for Seniors and Accessibility as part of its review of the Retirement Homes Act, 2010 (Act) regarding the removal of barriers to information sharing as it relates to enhancing complaints handling. Concurrently, RHRA has developed a process which allows referrals through consent and existing exemptions under the Act. RHRA also will provide complainants with information on how to contact other regulators with jurisdiction if the complaint falls out of the RHRA scope, and RHRA has included these contacts on its website.	n/a

2020-21	A1 Formalize a program specific to ensuring Risk Officer recommendations are either implemented or a rationale is provided to why the recommendations were not implemented. This rationale should be documented and shared with the stakeholders noted below in recommendation #3. It should be noted that, as time passes or events occur, there may be a valid rationale for why a Risk Officer recommendation no longer makes sense or is no longer valid.	complete	RHRA has proceeded with its previously identified plan to develop and implement a program to phase in recommendations from the Risk Officer. A leadership team member has been assigned ownership of each recommendation and is responsible for ensuring the recommendation is fully implemented, or properly concluded if no longer applicable. An important component of the process is RHRA's semi-annual tracking of each Risk Officer recommendation and identifying any recommendations that are no longer appropriate for implementation.	n/a
2020-21	A2 Develop an approach to directly identify Risk Officer recommendations, that are planned to be implemented, in the RHRA annual business plan.	complete	Risk Officer recommendations help inform the annual priorities for the RHRA. Management will adopt a method of highlighting Risk Officer recommendations within the annual business plan, including the planned actions that support addressing them.	n/a
2020-21	A3 Identify timelines for the implementation of each Risk Officer recommendation and share with the public, Board and Ministry.	complete	RHRA has established targeted timelines for implementation of each Risk Officer recommendation. Complexity of the matter addressed by the recommendation, organizational priority and resource availability are considered when setting the timelines. Implementation progress of all outstanding recommendations will be reviewed semi-annually and measured against identified timelines for completion.	n/a
2020-21	A4 Develop a process by which the status of each Risk Officer recommendation is shared with the public, Board and Ministry at appropriate regular intervals.	complete	As part of its accountability to the public, and in order to increase transparency, RHRA has posted a Risk Officer Implementation Status Report on its website. The Report includes the status (complete, partially complete, in progress or pending), summary of progress made to date and planned completion date for each recommendation. RHRA has added regular reporting on implementation of Risk Officer recommendations to the Board of Director's annual work plan. In February 2021, RHRA began providing this information to the Board of Directors through Governance, Regulatory Affairs and Nominations Committee meetings. As of April 2021, RHRA began informing the Ministry for Seniors and Accessibility (MSAA) semi-annually of its implementation of Risk Officer recommendations.	n/a
2020-21	A5 Complete a full review of all previous Risk Officer recommendations to ensure they have been implemented or a rationale has been provided as to why the recommendations were not implemented. Subsequently share the results with the public, Board and Ministry.	complete	RHRA reviewed all previous Risk Officer recommendations and identified those which have not yet been fully implemented. The status of all recommendations dating back to 2014-15 is publicly available on the RHRA website. As well, this information has been shared with RHRA Board of Directors and MSAA.	n/a

2020-21	B1 Collaboration with stakeholders An unlicensed homes outcome focused working group should be developed. The RHRA should work with the Ministry and other partner stakeholders to define accountability and responsibility for the working group. External stakeholders should include, but are not limited to: health agencies, religious / cultural organizations, community housing, other regulatory bodies, police, fire, long-term care, municipalities, etc. Note: Consideration should be given to whether established structures/groups can be leveraged in this regard.	will not complete	The RHRA's partnership and engagement function is liaising with community partners including HCCSS, PHU and local fire departments relating to congregate care settings which may meet the definition of a retirement home. Providing easy to understand language on what constitutes a retirement home and formalizing these engagements with these partners more will be undertaken this upcoming year. The RHRA will continue to explore options for broadening the groups we engage with to address concerns with potential unlicensed retirement homes. However, resources have been prioritized to work with the above noted partners and have not been allocated to undertake expanded formal working groups with other partners including religious groups, municipalities and others. RHRA will continue to be responsive to information received from any of these partners relating to unlicensed homes and follow-up as required.	n/a
2020-21	B2 Resources Given the continued growth in the aging population, continued growth in new and complex congregate living settings, and various other priorities of the RHRA, consideration should be given to whether there are enough resources available to adequately operationalize and maintain the unlicensed homes initiative. RHRA management, in collaboration with RHRA's Board of Directors, should assess whether current financial and staffing resources are adequate to meet the Authority's mandate which has been further expanded with an enhanced focus on unlicensed homes. Note: Continuing to align with RHRA's risk-based approach, consideration should be given for whether current resources need to be re-positioned or whether additional net new resources are required.	complete	RHRA continues to assess, on a risk-informed basis, which of the congregate settings that previously did not meet the legislative definition of a retirement home under the Act may now be subject to the Act due to a change in their circumstances. This will be an ongoing update into the future.	n/a
2020-21	B3 Public focused education Working in conjunction with the Ministry, the RHRA should further bolster information and tools available to the broader public, government agencies (e.g., public health agencies), and other stakeholder partners (e.g., fire departments). This effort should include general awareness of the unlicensed homes initiative, in addition to an easy-to-understand definition of a retirement home.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a

2020-21	B4 Operator focused education The RHRA should continue developing materials and tools to support operators. Consideration should be given for items such as: development of material in multiple languages, creation of material to leave behind for those congregate living settings that are being inspected, and, as noted above, a user-friendly definition of a retirement home.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2020-21	B5 Legislative Review The RHRA, in collaboration with the Ministry, should re-visit the Retirement Homes Act, including a review of the current definition of a 'Retirement Home'. It is important to occasionally review legislation to ensure that current realities are able to be appropriately addressed. It is strongly recommended that prior to any revision, a robust consultation process is undertaken with various agencies and stakeholders. This will help ensure any revisions address any current gaps, in addition to avoiding any excessive regulatory overlap.	in progress	RHRA continues to engage with MSAA.	Ongoing
2020-21	Other 1 The RHRA should consider augmenting and standardizing content that is communicated with stakeholders. A formalized functional role would support improving consumer and operator awareness through enhanced consistency, clarity and end-user friendly information. Furthermore, this strategic focus would support the success of several recommendations noted within this report.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2020-21	Other 2 The unlicensed homes initiative was developed with the support of various internal departments, which included a central working group and others who were consulted. While the RHRA continues to refine the unlicensed homes initiative and implement the recommendations noted within this report, consideration should be given to expand the individuals and stakeholders that are consulted. For example, RHRA should consider consulting additional external agencies/stakeholders and internal front-line staff.	complete	RHRA has spoken with MSAA on this issue and will continue to engage with them. In addition, this issue is managed and supported via the individual interactions between the RHRA inspections team, Partnerships and Engagement and call centre. RHRA will continue to seek input from the various stakeholders with whom it already interacts, as well as with staff. and it will seek to engage others as opportunities arise. The unlicensed homes initiative is not being expanded at this time. We continue to make government aware of what RHRA is experiencing and the challenges unlicensed homes presents to utilize other Ministries to assist in combatting this issue and protect residents in those settings. Unlicensed homes proactive monitoring is no longer a separate initiative but incorporated into the day to day activities of RHRA Regulatory Operations. The work on unlicensed homes is prioritized in relation to other work of RHRA to fulfil its mandate.	n/a

2021-22	Based on an assessment of factors during the licensing process, RHRA, on occasion, requests a business/operational plan from applicants. RHRA should consider developing a standard template for the type of information that is expected from applicants when business/operational plans are requested.	complete	The RHRA agrees with this recommendation. PDF attestation forms with versions for applicants and licensees, in English and French, have been developed which will be used to collect information during the licensing process.	n/a
2021-22	Construct a roster of pre-approved external vendors to provide RHRA quick access to specialized support which may be required throughout the licensing process. This may include expertise in areas such as, amongst others, legal, financial, operational, etc.	complete	The RHRA agrees with the recommendation. The RHRA has a signed agreement with a vendor who can provide financial vetting services, when needed.	n/a
2021-22	Develop a user-friendly online portal for submission of licensing applications and related documentation submissions. This portal should also feature a mechanism by which a minimum amount of information is required to be uploaded prior to the application being able to be submitted for review.	complete	The portal was fully launched in September, 2024	n/a
2021-22	Develop more formalized guidance in relation to surrendering licences, which aligns with 'Ceasing to operate a retirement home' requirements under Section 49 of the Act. This guidance should be provided to applicants when they first apply for a license, but also be easily accessible post licensing. RHRA should also consider proactively communicating this guidance in other circumstances deemed appropriate.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2021-22	Develop educational material that is available to all licensees, with a focus on operators new to the Province and/or new to operating retirement homes. This could take the form of documentation, video, online content, etc., with the goal being to provide a strong understanding of the retirement home regulatory environment including RHRA's requirements and expectations. Also consider whether the educational portion would be a requirement during the licensing process for all or some (e.g. new to the Province or new to operating retirement homes) applicants.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a

2021-22	Develop protocols and a formal approach for how conditions, post initial licensing, can be rescinded, or subsequently issued. Conditions may be placed on operator licences at the outset, however there are no formal protocols for how and when conditions will be rescinded or issued post licensure. RHRA should consider how this would be executed, as currently conditions are not tied to a length of time or parameters for how and when conditions could be removed (other than at the request of a licensee). The continued development/formalization of monitoring processes will also help in this regard.	complete	Internal written guidance for the removal of conditions was completed in September, 2023 and has been implemented since that time. A public facing document explaining what conditions are, the distinction between conditions imposed at time of licensing those imposed post-licensing, and the process for having conditions removed was subsequently drafted and posted to the RHRA's online licensee resources in July, 2024. It was also provided to all licensees through a "RHRA Update" e-mail. The RHRA compliance Monitor has started a process of assessing historic conditions that remain in place and, in the absence of licensee requests for condition removal, making recommendations for removal where the conditions are no longer necessary for resident protection.	n/a
2021-22	Many retirement home licensees operate in multiple jurisdictions and interact with local, provincial, and other oversight agencies. Currently RHRA, in some instances, seeks publicly available information during the licensing process. RHRA should consider expanding this approach to assess opportunities to build relationships to inform licensing related decisions.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2021-22	Develop enhanced and more robust notification requirements post licensure, which are clear and well communicated. This may include notification requirements such as: notification required if fines/penalties/legal action taken from an oversight body in another jurisdiction, equity changes exceeding a certain threshold (i.e. below 50%), beneficial ownership changes, and other items which could impact the status or risk profile of a licensee. The examples listed above are for illustrative purposes only and RHRA should assess what additional information would be valuable.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2022-23	Develop summarized snapshot of all retirement homes. Summarize and condense information currently available on retirement homes so that it is clear, concise, and easier to comprehend. RHRA should also take this opportunity to assess whether there is other information which is currently not in the public domain, but perhaps should be. For example, this may include disciplinary action details.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2022-23	Update RHRA website. Revamp the website to enhance user friendliness, while also taking the opportunity to alter content to be clear, concise, and easy to understand.	in progress	The RHRA agrees with this recommendation. The RHRA has identified a website rebuild as an organizational priority, articulated though the new Strategic Plan. Scoping work is underway, user needs analysis has been completed, and development of an RFP in process for this multi-year project.	Spring 2026

2022-23	Broaden familiarity of RHRA's existence and role. Consider further opportunities to broaden awareness of RHRA with residents, prospective residents, and others who may support or advise these groups. RHRA should focus on targeted efforts as opposed to mass media/advertising.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2022-23	Enhanced proactive relationship directly with retirement home residents. Create channels of communication by which there is a direct proactive relationship with residents. This can come in various forms but may include options such as: a resident newsletter published by RHRA or routine proactive meeting with resident councils. RHRA should assess whether this is currently within their ability, otherwise work with the Ministry to alleviate any hurdles.	complete	No further action required based on the recommendations from the 2023-2024 Risk Officer Annual Report.	n/a
2022-23	Update information access and privacy code and related policies/protocols. Recommendation: RHRA should review, update/enhance, and clearly communicate the information access and privacy code, which is designed to outline what information and in what circumstances information can be shared with residents and other relevant third parties. RHRA should also take this opportunity to assess whether proactive communications/information sharing (based on historical evidence) is warranted in certain circumstances. Context: There are various categories of information, some of which are clearly confidential, some of which are not confidential and can be shared, and other information which RHRA has classified as confidential. Although each situation is unique, RHRA should work on documentation and clearly communicate what information is considered confidential and for what reason. Clear, concise, and understandable version of such guidance should be provided on RHRA's website to ensure stakeholders have a clear understanding of how to request information, what type of information will be provided, and rationale for what type of information will not be provided due to privacy and/or confidentiality reasons. It should be noted that at the time of writing of this report, an updated draft access and privacy code had been developed and was being reviewed.	complete	The RHRA's Access and Privacy Code is part of the RHRA's MOU w	n/a