

Introduction to the new Proactive Inspection Program

October 2021

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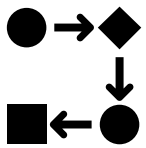
About the Proactive Inspection Program

- A new Proactive Inspection Program is part of the Ministry of Long-Term Care's plan to improve oversight of the long-term care sector and to improve resident quality of life and safety. This broader strategy includes initiatives to increase:
 - Home infrastructure and development
 - Staffing and care, and
 - Accountability, Enforcement and Transparency
- The reintroduction of proactive inspections addresses recommendations from the Auditor General, the Long-Term Care Commission, and feedback from the long-term care sector associations, family councils and residents' councils.
- The ministry will proactively inspect upon key areas of focus to ensure homes meet the requirements set out in legislation.

Overview



The Proactive Inspection Program (PIP) framework is resident-centred and includes direct discussion with residents. The PIP focuses on resident care needs and the home's programs and services.



Inspectors will conduct observations of residents and their care and follow a standard set of inspection protocols for consistency across the long-term care homes.



Proactive Inspections will be phased in over the next two years. Complaints and critical incidents will be managed through separate inspections.

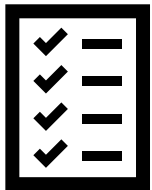
Overview



A team of two inspectors will conduct an unannounced proactive inspection on-site that will take approximately seven days to complete.

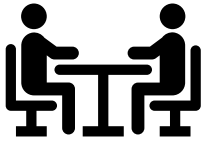


Upon entering the home, inspectors will engage with the Administrator or delegate and begin their inspection.



Homes will be required to complete confirmation checklists to ensure there is a quality improvement and utilization review system implemented in the home.

Overview

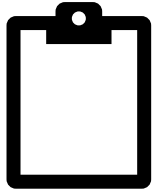


Inspectors will meet with administrators, tour the home, review records, make observations, and speak with residents and staff at the home.



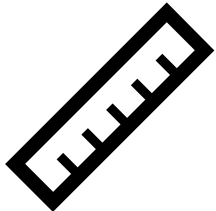
The inspection will **not** be done at the same time as inspections related to complaints, critical incidents, and follow-ups.

Overview



Enforcement actions when non-compliance is found, includes:

- Written Notification
- Voluntary Plan of Correction
- Compliance Order
- Director's Referral



The results of the proactive inspections will assist the ministry and long-term care homes in determining areas of focus where the long-term care homes can benefit from additional tools such as guidance material and best practices.



Engagement with the sector will be important to continuously improve the quality of the Proactive Inspection Program.

Key Areas of Focus

Infection Prevention
and Control (IPAC)

*Long-Term Care
Commission*

Abuse and Neglect

Resident Quality Inspection

Safe Medication
Management

*[Safe Storage of Drugs / Drug
Administration / Medication Incidents]*

2019 Public Inquiry

Nutrition and
Hydration

*Auditor General Food &
Nutrition*

Policies / Directives

*Long-Term Care
Commission/Resident
Quality Inspection*

Dining Observation

*Auditor General Food &
Nutrition*

Residents' Rights

Plan of Care

*[Personal Care / Falls Prevention /
Pain / Continence & Bowel Care /
Skin & Wound Care]*

Auditor General COVID

Proactive Inspection Protocols

The following inspection protocols will be used during the inspection:

Personal Support Services

Infection Prevention and Control

Medication

Dining Observation

Residents' Council Interview

Family Council Interview

Skin and Wound Care

Falls Prevention

Pain

Nutrition and Hydration

Prevention of Abuse, Neglect and Retaliation

Dignity, Choice and Privacy

Quality Improvement

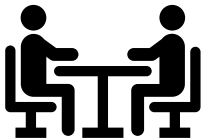
*Other inspection protocols may be used as required

Personal Support Services

Inspectors will:



Observe residents to see if they are getting the assistance they need with activities of daily living as per their plan of care, such as bathing, personal care, dress, continence care and bowel management.



Interview residents (or their SDM/family member) and direct care staff.



Review residents' clinical records.

Infection Prevention and Control (IPAC)

Inspectors will:



Observe for IPAC practices, including:

- Screening
- Signage / Postings
- Resident Visitation
- Hand Hygiene
- Cleaning and Disinfection
- Personal Protective Equipment (PPE)
- Resident Safety



Interview IPAC program Co-Ordinator and/or Administrator lead (if applicable).

Medication

Inspectors will:



Observe medication administration practices, drug storage area(s), and drug destruction and disposal area(s).



Interview Director of Care and the nursing staff administering medication to residents.



Review the home's records of medication incidents and adverse drug reactions.

Dining Observation + Nutrition and Hydration

Inspectors will:



Observe a full meal service focusing on residents receiving the correct menu items and the assistance they require.



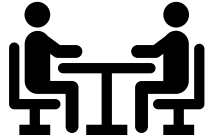
Interview residents and food service worker(s).



Review the LTCH's food temperature logs, food and fluid intake records, and relevant policy/procedures.

Residents' Council Interview

Inspectors will:



Interview the Residents' Council President (or active member of the Council if unavailable), and a representative of the Food Committee, if any.



Review meeting minutes.

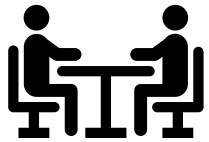


Verify compliance with the legislative requirements, such as:

- The Residents' Council operates freely without interference or fear of coercion, discrimination or reprisal;
- The licensee co-operates and communicates with the Residents' Council; and
- The licensee responds to any concerns or recommendations within 10 days.

Family Council Interview

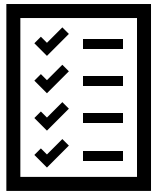
Inspectors will:



Interview the Family Council President (or active member of the Council if unavailable). *If there is no Family Council established at the home, inspectors will interview the administrator or appropriate staff member.



Review meeting minutes.

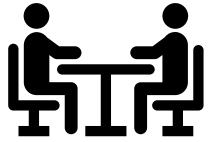


Verify compliance with the legislative requirements, such as:

- The Family Council operates freely without interference or fear of coercion, discrimination or reprisal;
- The licensee co-operates and communicates with the Family Council; and
- The licensee responds to any concerns or recommendations within 10 days.

Skin and Wound Care

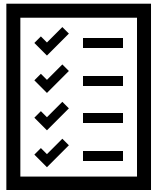
Inspectors will:



Interview staff members and the home's Skin and Wound Care Lead (or designate).



Review relevant policies, instruments, and training records.

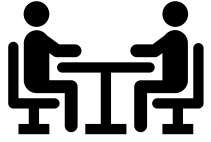


Verify whether the skin and wound care program at the home is in compliance with the legislative requirements, such as:

- Promoting skin integrity
- Preventing the development of wounds and pressure ulcers,
- Providing effective skin and wound care interventions, and
- Having direct care staff who are trained in providing skin and wound care.

Falls Prevention

Inspectors will:



Interview staff members and the home's Falls Prevention and Management Lead (or designate).



Review relevant policies, instruments, and training records.



Verify whether the falls prevention and management program at the home is in compliance with the legislative requirements, such as:

- Being interdisciplinary;
- Having readily available equipment, supplies, devices and assistive aids; and
- Having direct care staff who are trained in falls prevention and management.

Pain

Inspectors will:



Interview staff members and the home's Pain Management Lead (or designate).



Review relevant policies, instruments, and training records.



Verify whether the pain management program at the home is in compliance with the legislative requirements, such as:

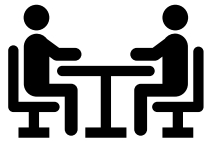
- Identifying and managing pain in residents;
- Providing assessment and reassessment instruments; and
- Having direct care staff who are trained in pain management, including recognition of specific and non-specific signs of pain.

Prevention of Abuse, Neglect and Retaliation

Inspectors will:



Observe how staff, residents, and others interact with residents.



Interview residents (or their SDM/family member) and staff.



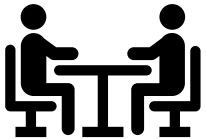
Review home's policy to promote zero tolerance of abuse and neglect.

Dignity, Choice and Privacy

Inspectors will:



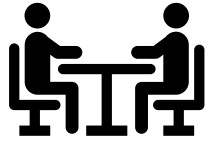
Observe how staff interact with residents to determine whether care is provided with courtesy, respect and dignity.



Interview residents (or their SDM/family member) and staff.

Quality Improvement

Inspectors will:



Interview the home's Quality Lead (or designate).



Review relevant quality improvement documents, such as the completed *LTCH Licensee Confirmation Checklist for Quality Improvement and Required Programs*, and the resident satisfaction survey.

Selecting Homes for Proactive Compliance Inspections



Short term

Selecting a cross-section of long-term care homes across the province, including small and large homes, for-profit and not-for-profit and with varying levels of legislative compliance history.



Long term

Over the next two years as MLTC inspector resources increase, the number of Proactive Inspections will grow; resulting in annual Proactive Inspections in every home in addition to risk-based inspections related to complaints and critical incidents.

Questions?

Any questions can be directed to the following email:

LTCHSupport@ontario.ca