

## OAGO Report Recommendations – Expected Timelines for Implementation

### Report Year: 2019 - Acute-Care Hospital Patient Safety and Drug Administration

|   | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | AG Report Response                                                                                                                                                                                                                                                                                                                                                               | Implementation Update                                                                                                                                                                                                                                                                                                             |
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| 1 | <p>To further emphasize patient safety as a foundation for hospitals’ organizational culture, we recommend that hospitals explicitly incorporate the words “patient safety” in their mission, vision, and/or as one of their core values, and communicate this to their staff, ensuring that related actions demonstrate this emphasis.</p>                                                                                                                                                                                                                                                                                                                            | <p>Ontario hospitals are governed by independent hospital boards, which provide guidance on an organization’s mission, vision and values.</p> <p>Ontario hospitals will review this recommendation at the board level to determine whether improvements are needed to elevate the culture of safety within their organization.</p>                                               | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> |
| 2 | <p>To determine and reduce the impact of never events on patient safety and the health-care system, we recommend that the Ministry of Health:</p> <ul style="list-style-type: none"> <li>work with internal and external partners to leverage an existing system that can accumulate and track hospital never-event data;</li> <li>in implementation and rollout completion of this system, analyze the frequency of never-events occurring at Ontario hospitals, estimating their cost to the health-care system; and</li> <li>partner with hospitals and best practice organizations/stakeholder groups to develop a plan to prevent them from happening.</li> </ul> | <p>The Ministry welcomes this recommendation as it supports patient safety across the health system.</p> <p>The Ministry will assess opportunities to leverage existing data collection tools to support the capture of hospital never-events and identify evidence-based approaches to address the frequency of never events and assess the healthcare system cost impacts.</p> |                                                                                                                                                                                                                                                                                                                                   |

|   | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                       | AG Report Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Implementation Update                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 3 | <p>To minimize the occurrence of serious preventable patient safety incidents, we recommend that hospitals:</p> <ul style="list-style-type: none"> <li>enhance patient safety practices to eliminate the occurrence of never-events;</li> <li>set a formal target to eliminate the occurrence of never-events and include this target in their Quality Improvement Plans; and track and report never-events to the Ministry of Health.</li> </ul>                    | <p>Ontario hospitals are committed to enhancing patient safety practices and will work with their boards to determine whether never-events should be added to future Quality Improvement Plans.</p>                                                                                                                                                                                                                                                                                     | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> <p>In addition, Ontario Health is responsible for determining mandatory indicators in hospital Quality Improvement Plans. Quality Improvement Plans were paused during COVID.</p> |
| 4 | <p>To better enable hospitals to prevent similar patient safety incidents, including never-events from recurring at different hospitals, we recommend that the Ministry of Health work with the Ontario Hospital Association and applicable stakeholder groups to establish a forum where hospitals can share their knowledge and lessons learned from patient safety incident investigations.</p>                                                                   | <p>All health-care providers have a role in improving patient safety. The Ministry of Health supports this recommendation and will work with the Ontario Hospital Association and other health system partners like Ontario Health, the Canadian Patient Safety Institute, and the Canadian Medical Protective Association to examine the feasibility of having a shared knowledge platform for patient safety incident investigations.</p>                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| 4 | <p>To enable nurses' prospective employers to obtain a more complete record of nurses' employment history and performance and make well-informed hiring decisions, we recommend that the Ministry of Health have the Ontario Hospital Association work with the College of Nurses of Ontario and other regulatory stakeholders to:</p> <ul style="list-style-type: none"> <li>identify gaps in the current information available to prospective employers</li> </ul> | <p>The Ministry of Health is working with the health sector to address gaps in information-sharing between colleges and health system partners.</p> <p>As part of continuing to improve transparency and increase information sharing between employers and the health regulatory colleges, the College of Nurses of Ontario (College) and the Ministry have worked to add information about a nurse's employers from the past three years on the College's public register so that</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |

|   | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | AG Report Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Implementation Update                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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|   | <p>regarding past performance issues and terminations;</p> <ul style="list-style-type: none"> <li>take steps to address gaps identified.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                        | <p>employers have a reliable way to obtain employment information about nurses.</p> <p>The College has also worked to include all current employers on the public register. Since many nurses have more than one employer, this will provide a more accurate picture of a nurse's employment.</p> <p>Work is currently under way to link information in better ways. The College has proactively partnered with nurse employers to establish an Employer Reference Group to identify areas to support employers' needs relating to nursing regulation.</p> |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 6 | <p>In order for hospitals that hire nurses to have access to the complete record of nurses' past places of employment and disciplinary history, we recommend that hospitals:</p> <ul style="list-style-type: none"> <li>use the National Council of State Boards of Nursing public database to determine whether nurses they hire, and employ have faced disciplinary actions in the United States; and</li> <li>if the hospital uses agency nurses, require nursing agencies to confirm these nurses have been screened through this database.</li> </ul> | <p>Ontario hospitals will review this recommendation and are committed to working with the Ontario Hospital Association and the College of Nurses of Ontario to identify opportunities to enhance the information available to employers in making hiring decisions.</p>                                                                                                                                                                                                                                                                                   | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> <p>At present, in Ontario, nurses are required to self-report to the College of Nurses of Ontario any nursing license they hold in any other jurisdiction, other professional designations they hold, their place(s) of employment, whether they have been investigated by a regulatory body for any misconduct in other jurisdictions and whether they have been convicted of (or charged with) a crime. Re-enforcing this reporting requirement may provide hospitals with access to the employment records of nurses from other jurisdictions.</p> |

|   | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | AG Report Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Implementation Update |
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| 7 | <p>To help ensure that when hospitals hire nurses, they have access to their full disciplinary record, we recommend that the Ministry of Health request that the Ontario Hospital Association and the College of Nurses of Ontario work together with their provincial and territorial counterparts to:</p> <ul style="list-style-type: none"> <li>• explore a national system for provincial and territorial nursing regulatory bodies to report their disciplinary actions; and</li> <li>• put in place an effective process that will ensure that all places of past employment and disciplinary records from other jurisdictions for each nurse are in its database, including records from US nursing databases.</li> </ul> | <p>The <i>Regulated Health Professions Act</i>, 1991, requires every Ontario nurse to file a report in writing with the Executive Director of the College of Nurses of Ontario if there has been a finding of professional misconduct or incompetence made against the nurse by another body that governs a profession inside or outside of Ontario unless doing so would violate a publication ban. The report must be filed as soon as reasonably practical after the nurse receives notice of the finding made against her or him. The Ministry will work with the College of Nurses of Ontario to ensure that this requirement is communicated to nurses and will work with the College to explore best practices involving the sharing of information between provincial and territorial nursing regulators.</p> |                       |
| 8 | <p>To better inform employers in their hiring decisions and protect patients from the risk of harm, we recommend that the Ministry of Health assess for applicability in Ontario the actions taken by US states to protect hospitals and other health-care providers from liability associated with any civil action for disclosing a complete and truthful record about a current or former nurse to a prospective employer.</p>                                                                                                                                                                                                                                                                                                | <p>The Ministry will assess the actions taken by US States and Canadian provinces to protect hospitals and other health-care providers from any civil action for disclosing a complete and truthful record about a current or former nurse to a prospective employer for applicability in Ontario.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                       |
| 9 | <p>In the interest of patient safety and in order for hospitals and agencies to hire nurses fully aware of their past employment and performance history, we recommend that the Ministry of Health explore means to:</p> <ul style="list-style-type: none"> <li>• enable hospitals and agencies to provide and</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                        | <p>While the recommendation pertains to labour relations between the employer and unions, the Regulated Health Professions Act, 1991, may have a supportive role in enabling sharing of information between the College of Nurses of Ontario and employers. The Act provides a regulation that permits the government to prescribe purposes for which disclosures can be made</p>                                                                                                                                                                                                                                                                                                                                                                                                                                     |                       |

|    | Recommendation                                                                                                                                                                                                                                                                                                                                                           | AG Report Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Implementation Update |
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|    | <ul style="list-style-type: none"> <li>• receive truthful references and information to make informed nursing hiring decisions;</li> <li>• require these organizations to disclose such information when it is requested by a prospective employer.</li> </ul>                                                                                                           | <p>under clauses 36(1)(d.1) and (d.2) from the College of Nurses of Ontario to public hospitals or other named/described persons of certain information stemming from its investigations. The Ministry will examine this opportunity.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                       |
| 10 | <p>So that hospitals can make optimally informed hiring and staffing decisions, we recommend that the Ministry of Health require all hospitals in Ontario to:</p> <ul style="list-style-type: none"> <li>• perform criminal record checks before hiring nurses and other health-care employees; and</li> <li>• periodically update checks for existing staff.</li> </ul> | <p>Under the Long-Term Care Homes Act and its regulations, the Ministry outlines criminal record check requirements for long-term-care home employees. The Ministry will explore the possibility of similar requirements for hospital employees.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                       |
| 11 | <p>To enable hospitals to take timely action to improve patient safety, we recommend that the Ministry of Health explore means to make it easier and less costly for hospitals and ultimately the taxpayer to address physician human resources issues, especially in cases when doctors may have harmed patients.</p>                                                   | <p>When harm to a patient occurs, hospitals, employers and health regulatory colleges have mechanisms in place to address concerns and to take action in a timely manner. Disciplinary action against health-care providers is but one way of preventing reoccurrence and is often an extreme measure that is linked to risk of harm.</p> <p>There are other less costly and more timely ways of addressing concerns, which may include mediation and alternative dispute mechanisms among others.</p> <p>Following the release of the 2019 Arbitration Award regarding the dispute over physician compensation between the provincial government and the Ontario Medical Association (OMA), the Ministry is committed to investigating the</p> <p>recommendation from the Auditor General of Ontario's 2016 Large Community Hospital Operations audit to review the physician appointment and appeal</p> |                       |

|    | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | AG Report Response                                                                                                                                                                                                                                                                                               | Implementation Update                                                                                                                                                                                                                                                                                                             |
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|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>processes for hospitals and physicians under the Public Hospitals Act.</p> <p>As part of this review, the Ministry will also explore opportunities to make it easier and less costly for hospitals to address physician human resource issues, especially in cases when doctors may have harmed patients.</p> |                                                                                                                                                                                                                                                                                                                                   |
| 12 | <p>To improve patient safety, we recommend that the Ministry of Health:</p> <ul style="list-style-type: none"> <li>review the Accreditation Canada hospital reports and identify areas where hospitals may consistently not be meeting required patient safety practices and high-priority criteria; and</li> <li>follow up with hospitals in respect of problem areas to confirm that actions are taken to correct deficiencies.</li> </ul>                                                         | <p>Patient safety is an important dimension of quality. Ontario Health's mandate includes holding health-care providers accountable for health system performance and quality. Moving forward, the Ministry will request that Ontario Health address this recommendation as part of its mandate.</p>             |                                                                                                                                                                                                                                                                                                                                   |
| 13 | <p>So that hospitals fully complete medication reconciliation to reduce the risk to discharged patients and that they have all the necessary patient information to properly investigate any incidents with patients' dosages or drug interactions that might occur and trigger hospital readmission, we recommend that hospitals reinforce with staff the importance of the medication reconciliation documentation processes so that all the necessary information is consistently documented.</p> | <p>Ontario hospitals support documentation of medication reconciliation being consistently more complete, comprehensive and accurate.</p>                                                                                                                                                                        | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> |

|    | Recommendation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | AG Report Response                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Implementation Update                                                                                                                                                                                                                                                                                                             |
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| 14 | <p>To reduce the risk of medication errors and readmissions to hospital, we recommend that the Ministry of Health:</p> <ul style="list-style-type: none"> <li>require hospitals to complete medication reconciliation for all patients;</li> <li>require hospitals to include medication reconciliation in their Quality Improvement Plans; and</li> </ul> <p>in conjunction with relevant hospitals review their IT system needs to be able to track necessary medication reconciliation information and take action for improvement where needed.</p> | <p>The Ministry of Health supports this recommendation and will support:</p> <ul style="list-style-type: none"> <li>Ontario Health in reviewing and assessing how medication errors are reported in hospitals and explore ways to strengthen reporting mechanisms;</li> <li>Ontario Health in evaluating how to make medication incident reporting within hospitals part of their Quality Improvement Plans; and</li> </ul> <p>hospitals with their review of their IT systems and help explore opportunities to enhance tracking systems for medication reconciliation.</p> |                                                                                                                                                                                                                                                                                                                                   |
| 15 | <p>To improve patient safety, we recommend that hospitals reinforce with nurses necessary medication administration processes to ensure that:</p> <ul style="list-style-type: none"> <li>independent double-checks of high-risk medications are done to verify that correct medication and dosage are administered;</li> <li>nurses witness patients taking and swallowing high-risk medications; and</li> <li>nurses use two unique identifiers to confirm the identity of patients before administering medication to them.</li> </ul>                | <p>Ontario hospitals will review existing policies and processes for the administration of all medications to determine whether best practices are being followed to improve patient safety.</p>                                                                                                                                                                                                                                                                                                                                                                             | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> |
| 16 | <p>To minimize patient safety incidents due to missing information or miscommunication, we recommend hospitals adopt, based on patient condition, the practice of making nursing shift changes at the patients' bedside and where possible involving the patients and their</p>                                                                                                                                                                                                                                                                         | <p>Ontario hospitals support the review of current practices to ensure safe transfer of information between care providers. Ontario hospitals will determine what supports are needed to engage patients, where possible, to enhance nursing shift changes.</p>                                                                                                                                                                                                                                                                                                              | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p>                                                                                                                                         |

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|    | families, with the consent of the patients, in the process.                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                             | The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).                                                                                                                                                                                                                                  |
| 17 | To improve patient safety with respect to medication administration and where a compelling business case for cost-effectiveness can be made, we recommend that the Ministry work with hospitals toward the automation of pharmacy related tasks.                                                                                                                                                                                                                     | The Ministry acknowledges that there may be opportunities to improve how hospitals use automation to drive efficiency and safety in their local pharmacy operations. The Ministry will encourage hospitals, as part of their annual capital planning process, to consider the cost effectiveness of moving toward the automation of pharmacy-related tasks. |                                                                                                                                                                                                                                                                                                                                                                   |
| 18 | To improve the accuracy of reported hand hygiene compliance, while at the same time encouraging hand hygiene, we recommend that the Ontario Hospital Association work with hospitals to evaluate and further the adoption of additional methods to assess and monitor hand hygiene, such as electronically monitored hand hygiene pumps and monitoring systems and asking patients to observe and record the hand hygiene compliance of their health-care providers. | Ontario hospitals take hand hygiene compliance very seriously as it is the single most effective way to reduce the risk of health care–associated infections. Ontario hospitals agree with enhancing observation and monitoring methods and will examine strategies to improve hand hygiene compliance within their organizations.                          | Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.<br><br>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).                                        |
| 19 | So that sterile-rooms and the equipment used in the mixing and preparation of intravenous medications are cleaned according to required standards; we recommend that hospitals: <ul style="list-style-type: none"> <li>• provide their pharmacy and housekeeping staff with proper training on how to conduct the cleaning; and</li> <li>• monitor the cleaning to ensure proper processes are being followed.</li> </ul>                                            | Ontario hospitals will continue to work with the Ontario College of Pharmacists to implement strategies to ensure proper practices are put in place for cleaning of sterile-rooms and equipment.                                                                                                                                                            | Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.<br><br>The OHA is committed to working with the Ministry of Health and the Ontario College of Pharmacists to inform their updates to the Health Sector Audit Committee (HSAC). |

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|    |                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                        | <p>Since 2016, the OHA has continued to reiterate that full compliance with the NAPRA standards will require significant capital investments for hospital pharmacies.</p>                                                                                                                                                         |
| 20 | <p>To improve hospitals' compliance with the Canadian Standards Association's standards pertaining to the washing and sterilization of surgical tools and medical equipment, we recommend that hospitals have their washing and sterilization of surgical tools and medical equipment inspected internally on an annual basis.</p>                                                                          | <p>Ontario hospitals will review strategies to improve compliance with the Canadian Standards Association's standards pertaining to the washing and sterilization of surgical tools and medical equipment.</p>         | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> |
| 21 | <p>In order for contracts with private providers of sterilization services to be managed effectively by hospitals, we recommend that hospitals:</p> <ul style="list-style-type: none"> <li>include all the necessary service standards and performance indicators in these contracts; and</li> <li>on a regular basis, assess the private service provider's compliance with all contract terms.</li> </ul> | <p>Where the use of external providers for sterilization services exists, Ontario hospitals will closely review existing processes and contracts to ensure that the quality and safety of care is not compromised.</p> | <p>Efforts to address the recommended actions have been delayed due to the COVID-19 pandemic. This includes learning events that would support implementation of this recommendation.</p> <p>The OHA is committed to working with the Ministry of Health to inform their updates to the Health Sector Audit Committee (HSAC).</p> |
| 22 | <p>So that patients with a life- or limb-threatening condition receive timely care from the closest hospital, we recommend that the Ministry of Health leverage learned lessons from hospitals that utilize "command centres" and work with CritiCall toward the development of a provincial bed command centre.</p>                                                                                        | <p>The Ministry will work with CritiCall to explore the potential of a provincial bed command centre, including lessons learned from Humber River Hospital Command Centre.</p>                                         |                                                                                                                                                                                                                                                                                                                                   |