



Chapter 28

Five Hills Regional Health Authority—Nourishing and Safe Food Services in Long-Term Care Facilities

1.0 MAIN POINTS

Under *The Regional Health Services Act*, Five Hills Regional Health Authority (Five Hills) is responsible for the delivery of health care in its health region. This includes long-term care which is delivered in facilities either owned and operated by Five Hills or its affiliates who receive funding to provide services to Five Hills. There are currently 536 long-term care beds in Five Hills.

Our audit for the period January 1, 2012 to July 31, 2012, found that Five Hills' processes could not always ensure that nourishing and safe food services were provided to residents of its long-term care facilities. We made 11 recommendations. Five Hills did not have its menus reviewed to ensure compliance with Canada's Food Guide. It did not have a standard system for tracking individual dietary needs, or for periodically reviewing those needs. Meals were not always served at appropriate temperatures and textures, and records of meals served were not reviewed by registered dietitians. Also, Five Hills did not conduct quality assurance reviews of its long-term care food services.

Additionally, Five Hills can improve long-term care food services by updating its policy and procedures manual, providing timely mealtime assistance to residents, monitoring affiliate food costs, developing procedures for documenting and addressing complaints, and regularly surveying residents and their families for satisfaction relating to food services.

We encourage other regional health authorities to use the criteria described in this chapter to assess their own processes for providing nourishing and safe food services in their long-term care facilities.

2.0 INTRODUCTION

Five Hills oversees the provision of health services for an area of south-central Saskatchewan that includes 54,000 residents. *The Regional Health Services Act* outlines the regional health authority's responsibilities.

Like other regional health authorities, Five Hills is responsible for the provision of long-term care in its health region. *The Housing and Special-Care Homes Regulations* outline standards for food service in long-term care homes. Long-term care homes (also called special-care or nursing homes) meet the needs of individuals usually having heavy care needs (i.e., require 24-hour nursing care and supervision in a secure setting) whose needs cannot appropriately be met through home or community-based services. Individuals are admitted on the basis of assessed need. These assessments are done by each regional health authority. Most regional health authorities offer the person with the

greatest need and living with the greatest risk the first available bed with the option to transfer to the facility of their choice when a bed becomes available there.¹

Government funds long-term care homes through regional health authorities. Regional health authorities may operate a long-term care home directly or through an affiliation contract.² The cost paid by the residents for long-term care varies and is based on income and provincial guidelines.

There are 536 long-term care beds available in ten long-term care homes in Five Hills. Five Hills owns and operates seven of the facilities and affiliates own and operate the remaining three. The ten facilities that provide long-term care services to residents in Five Hills and their location are as follows:

Figure 1 – Five Hills Long-term Care Facilities

Long-term Care Facilities	# of Beds
Assiniboia Union Hospital (Assiniboia)	22
Ross Payant Centennial Home (Assiniboia)	38
Central Butte Regency Hospital (Central Butte)	20
Craik & District Health Centre (Craik)	15
St. Joseph's Hospital/Foyer d'Youville (Gravelbourg)*	50
Lafleche and District Health Centre (Lafleche)	16
Pioneers Lodge (Moose Jaw)	74
Providence Place (Moose Jaw)*	174
Extendicare Moose Jaw (Moose Jaw)*	110
Grasslands Health Centre (Rockglen)	17

*denotes affiliated facilities

3.0 BACKGROUND

Nutrition in long-term care facilities has a significant impact on health care costs and quality of life. Nutrition is essential to the health of a long-term care resident. Having sufficient energy and nutrients can help older people retain their health, prevent and manage their chronic conditions, and contribute to a longer life filled with quality living.

Recent research suggests that the rate of malnutrition among institutionalized elderly people ranges between 5% and 85% with an estimated average of 30%.³ Poor nutrition can cause declines in immune and sensory functions (e.g., macular degeneration), and worsens symptoms related to chronic diseases such as cardiovascular disease, diabetes, osteoporosis, and cancer.⁴ Chronic disease is a major factor of health care

¹ Saskatchewan Ministry of Health. Housing Options for Saskatchewan Seniors. *Provincial Advisory Committee of Older Persons*, p. 5.

² Designated under *The Regional Health Services Act*, an affiliate is the operator of a health care facility (such as a long term care home or hospital) that was operating before the creation of regional health authorities. Affiliate facilities are not owned or operated by regional health authorities, but receive funding from them to provide health services.

³ Lengyel, C., Whiting, S.J., & Zello, G.I. (2008). Nutrient Inadequacies Among Elderly Residents of Long-Term Care Facilities. *Canadian Journal of Dietetic Practice and Research* 69(2), p.83.

⁴ Public Health Agency of Canada. (2009). *Healthy Eating and Healthy Aging*. http://www.phac-aspc.gc.ca/seniors-aines/publications/pro/healthy-sante/haging_newvision/vision-rpt/eating-alimentation-eng.php (accessed June 12, 2012).



costs. The annual cost of chronic diseases has been estimated at 42% of health spending in Canada.⁵

With the aging population, there is growing demand for long-term care services. Any nutritional deficiencies in long-term care residents will likely put additional pressure on acute care⁶ in Five Hills.

The elderly in Saskatchewan deserve to live comfortably, and families wish to see their parents and grandparents treated with dignity. Well-prepared, nutritious food can help residents maintain a better quality of life that comes as close as possible to living in their own homes.

4.0 AUDIT OBJECTIVE, SCOPE, CRITERIA, AND CONCLUSION

The objective of this audit was to assess whether Five Hills provided nourishing and safe food services in its owned and affiliated long-term care facilities for the period from January 1, 2012 to July 31, 2012.

To conduct this audit, we followed the *Standards for Assurance Engagements* published in the *CICA Handbook - Assurance*. We examined Five Hills' policy and procedures manual, meal plans (i.e., menus), health inspection reports, and other relevant documents. We utilized the services of a registered dietitian to evaluate menus used in Five Hills. We also visited all the long-term care facilities in Five Hills.

To evaluate Five Hills' processes, we used criteria based on the work of other auditors and current literature listed in Section 6.0. Five Hills' management agreed with the criteria in **Figure 2**.

Figure 2—Audit Criteria

To provide nourishing and safe food services to residents of long-term care facilities, Five Hills Regional Health Authority and its affiliates should:

1. Set standards and guidelines

- 1.1. Develop nutritional standards based on best practices (e.g., Canada's Food Guide) and consistent with the law
- 1.2. Adopt specific guidelines for how and when meals are prepared and delivered
- 1.3. Set procedures for meal-time assistance practices

2. Plan nutritional and edible meals for residents

- 2.1. Document and review nutritional plans for each resident
- 2.2. Design meal plans in accordance with nutritional standards and individual nutritional plans
- 2.3. Allocate sufficient resources for meals

3. Provide safe and quality meals

- 3.1. Operate safe and clean kitchen facilities
- 3.2. Follow proper hygienic practices
- 3.3. Deliver meals, snacks, and fluids that meet meal plans
- 3.4. Serve meals that have appropriate temperature and texture
- 3.5. Assist patients as needed
- 3.6. Supply alternative meals to residents with special dietary needs

4. Monitor provision of food service

- 4.1. Undertake periodic assessments of food service delivery
- 4.2. Review complaints and incidents
- 4.3. Take corrective action

⁵ Mirolla, M. (2004). *The Cost of Chronic Disease in Canada*.

<http://www.gpiatlantic.org/publications/summaries/chroniccanadasumm.pdf> (accessed June 11, 2012)

⁶ Acute care services provide necessary and short-term treatment of a serious injury or illness or an urgent medical condition. Such care is often provided in a hospital.

For the period January 1, 2012 to July 31, 2012, Five Hills Regional Health Authority's processes could not always ensure that nourishing and safe food services were provided to residents of its long-term care facilities because Five Hills did not have:

- › Its menus reviewed to ensure compliance with Canada's Food Guide
- › A standard system for tracking individual dietary needs and for periodically reviewing individual needs
- › Meals consistently served at the appropriate temperature and texture
- › Records of all meals served in long-term care facilities reviewed by a registered dietitian
- › Regularly conducted quality assurance reviews of food services as required under its own policy

In addition, Five Hills needs to update its regional dietary policy manual, provide timely meal-time assistance to residents, monitor affiliate food costs, develop procedures for documenting and addressing complaints, and regularly survey residents and their families for satisfaction of food services.

5.0 KEY FINDINGS AND RECOMMENDATIONS

5.1 Review and Update Nutritional Standards

5.1.1 Menus Need to be Reviewed

Five Hills has a Nutrition and Food Services Policy and Procedures Manual that sets out policies and procedures for the delivery of food services in Five Hills. The manual does not set nutritional standards for the food served in its long-term care facilities. Rather, Five Hills uses a menu as its basis for setting a nutritional standard.

Prior to 2012, Five Hills used a menu that had been in place since 1995. A regional committee of dietary management and long-term care facility cooks adopted a new menu in 2012. Five Hills now uses a four-week menu developed by a private sector company, provided free of charge because Five Hills uses an affiliated company to purchase its food items. The new menu changes twice a year based on the seasons (spring/summer and fall/winter). Therefore, a four-week cycle of meals is used for six months of the year. Good nutrition requires eating a variety of food types chosen from Canada's Food Guide and this includes incorporating seasonal foods into menus. Three facilities in Five Hills have not transitioned to the new menu (two affiliates continue to use a six-week menu while one owned facility uses an alternative four-week menu).

The Housing and Special-care Homes Regulations require basic daily food to be provided in accordance with Canada's Food Guide. By receiving food as recommended by Canada's Food Guide, residents meet their nutrient needs and reduce their risk of obesity and chronic diseases. Five Hills relied on a private sector company's dietitians to



ensure that the new four-week menu was in accordance with Canada's Food Guide. Five Hills did not have the new menu confirmed by one of its own registered dietitians to ensure requirements of Canada's Food Guide or the requirements of their residents were met. Registered dietitians are health professionals trained to have extensive knowledge in food and nutrition.

We reviewed the menus used by facilities within Five Hills with the assistance of a registered dietitian. We found that the new menu used by Five Hills did not completely comply with Canada's Food Guide. For example, the menu offered juice too often in lieu of fresh fruit and vegetables. Fresh fruit is important for essential vitamins and minerals but also for the fibre it contains. Constipation is a common complaint among the elderly and limited access to fresh or canned fruits can contribute to that problem. Also, the new menu did not outline portion sizes which means facilities may be providing inconsistent amounts of calories, fibre, vitamins, and minerals. The new menu also did not always provide for at least two servings of fish each week as recommended by Canada's Food Guide. We note the six-week menu used by one of the affiliates complied with Canada's Food Guide and provides residents with the appropriate number of servings of foods from each of the four food groups.

In order for health care facilities to provide nutritious food that meets the daily medical and physical needs of its residents, menus should be reviewed by dietitians to ensure that they are based on best practices and provide the necessary nutritional requirements to residents. It may be useful for Five Hills to work with the Ministry of Health and/or other regional health authorities to develop a standard menu assessment tool that could be used province-wide to evaluate long-term care menus.

- 1. We recommend that Five Hills Regional Health Authority confirm all long-term care facility menus comply with Canada's Food Guide.**

5.1.2 Guidelines in Place but Need Updating

As noted earlier, Five Hills has a Nutrition and Food Services Policy and Procedures Manual that sets out policies and procedures for the delivery of food services in Five Hills. The manual sets procedures for food preparation, meal-time assistance, appliance operation and kitchen clean-up. It also has a number of facility-specific procedures that detail daily procedures for cooks and dietary aides (e.g., procedures for starting breakfast in the morning). The manual is outdated. The manual was created in 2005. Some of the policies in the manual were reviewed and revised in 2008 and 2009. However, many policies have not been reviewed and updated since the manual was created in 2005. For example, the manual includes organizational structures from 2005 and contains quality assurance policies created in 2005 that are not being followed by the region, which is further described in Section 5.4.1.

We found that a number of food service processes were inconsistently applied throughout Five Hills. Later in this chapter, we provide details on these inconsistencies. Without an updated policy manual, Five Hills is unable to ensure that the food service practices of its facilities, and those of its affiliated facilities, will meet the standards it has adopted.

2. **We recommend that Five Hills Regional Health Authority review and update its Nutrition and Food Services Policy and Procedures Manual.**

5.1.3 Procedures for Meal-Time Assistance in Place

Five Hills has procedures in place for meal-time assistance. The policy manual stipulates that only care staff (not kitchen staff) will assist and supervise residents at meal time. During the audit, we observed that only care staff were assisting and supervising residents at all of the facilities.

5.2 Require Better Tracking and Review of Residents' Dietary Needs

5.2.1 Develop a Standard System for Meeting Dietary Needs

Residents' dietary needs (including nutritional requirements) are assessed upon admission to a long-term care facility and documented in the nutrition section of an admission form. Nursing care monitors the health of the resident (e.g., blood sugar level, weight) and the kitchen staff tracks the dietary needs of a resident (e.g., diabetic, allergies, likes/dislikes). Communication about dietary needs of residents between the nursing care and the kitchen staff was not always well documented. Also, Five Hills does not have standards in place that require annual reviews of dietary needs of residents by a registered dietitian. Residents with complex medical needs require alterations of the basic menu to help them meet their nutritional requirements and alterations should be reviewed by a registered dietitian.

Methods of tracking residents' individual dietary needs and changes to those dietary needs are inconsistent throughout Five Hills. While some facilities effectively track original dietary needs and the changes made to them, others rely largely on staff's knowledge of residents and verbal communication between nursing care and kitchen staff. While staff may have a thorough knowledge of their respective residents, without a well-documented system there is a risk of the wrong diets being prescribed and the wrong meals being served to residents. Only two facilities tracked dietary changes with dates and indication of who made the changes. Tracking these changes ensures that if a resident's condition changes (e.g., changes in weight, blood sugar levels fluctuate, they begin having trouble swallowing), staff can review their respective dietary history to determine diet impact.

It is important for facilities to track the dietary needs of its individual residents. Every resident is different and may have unique dietary needs. Diabetic residents will require less sugar than in regular diets, and those residents who have difficulty swallowing solid foods may need their foods ground or pureed in order for them to eat. In these cases, receiving the wrong meal could jeopardize their health and the need for facilities to ensure that residents receive appropriate meals is that much more important. Similarly, if residents' dietary needs change, facilities must have processes in place to adapt their diets to best suit individual needs.



- 3. We recommend that Five Hills Regional Health Authority implement a standard system of tracking individual residents' dietary needs and changes to those needs.**

Presently, dietitians in Five Hills only review the dietary needs of a long-term care resident when asked for a consult by care staff. They do not review the dietary needs upon admission or on a periodic basis. To ensure residents receive the appropriate amount of nutrition, Five Hills should have registered dietitians periodically review the dietary needs of each resident. Five Hills should develop tracking procedures to flag a resident's need for a dietitian consult. For example, Five Hills could monitor residents' food intake. This would help Five Hills identify residents who are at risk of becoming malnourished and would benefit from an assessment from a registered dietitian.

- 4. We recommend that Five Hills Regional Health Authority develop guidance for when a registered dietitian should review dietary needs of residents.**

5.2.2 Menus Designed

As previously mentioned, Five Hills uses its menu as its nutritional standard. However, menus are adapted to each resident's individual nutrition needs. For example, dessert is removed or replaced with an alternative for diabetics. However, as noted above, Five Hills does not have a consistent tracking system for nutritional needs of residents, nor does a registered dietitian review nutritional needs of residents.

5.2.3 Sufficient Resources

For all facilities, including long term care facilities, Five Hills sets the budget for food services as part of its annual budget process.

The dietary department in each Five Hills owned long-term care facility has a budget. It includes such things as salaries and benefits, supplies (e.g., food, cleaning supplies, utensils, etc.), and other expenses (e.g., postage, telephone). Every six months, Five Hills reports the actual revenue and expenses for each dietary department for its seven owned facilities. The affiliates budget and report separately as they are contracted agencies. Five Hills did not monitor food costs per resident at all of the affiliates.

- 5. We recommend that Five Hills Regional Health Authority obtain annual average food cost per day information from its affiliates to confirm that a reasonable amount is being spent on food for residents of long-term care homes.**

The regional committee of dietary management and facility cooks (not including representation from one affiliate) discuss the financial reports and provide explanations of any variances. For example, they monitor the food cost per resident per day, which is typically budgeted around \$6.00. If there are facilities that exceed the average food cost per day, management follows up with those facilities. During our audit, we found most facilities are spending more than \$6.00 per resident per day on food costs. We note that the amount spent on food per resident per day is consistent with other jurisdictions such as Ontario.⁷

5.3 Improvements Needed in Order to Provide Safe and Quality Meals

5.3.1 Safe and Clean Kitchen Facilities in Operation

We observed clean kitchen facilities and eating areas throughout Five Hills. Food was properly stored (i.e., food was not stored on the floor and raw meat was not above ready-to-eat food), and food was kept at appropriate temperatures. Each facility tracked the temperature of the refrigerators and freezers throughout the day on a daily basis to ensure stored food was cold enough.

Each facility also had cleaning schedules for its kitchens. However, not all cleaning schedules were initialled off once the duty was performed. Good practice would be to have the cleaning schedules initialled off to ensure the cleaning schedule was being followed.

Long-term care facilities are required to obtain public health licenses and undergo regular public health inspections in order to continue their operations. The facilities of Five Hills have generally good public health inspection records. As noted above, our findings are consistent with these records.

5.3.2 Proper Hygienic Practices are Followed

Staff in each facility followed proper hygienic practices. During the audit, we observed all staff wore aprons, hair nets, and limited jewelry (e.g., wedding band and wristwatch) while working in the kitchen. The facilities also had adequate hand-washing stations throughout the kitchens, with liquid soap and single-use paper towels at each station.

All kitchen staff are required to have safe food handling training when starting employment with Five Hills. One affiliate requires its staff to retake this training every five years. As good practice, Five Hills should consider having kitchen staff take refresher courses for safe food handling.

⁷ Dietitians of Canada Long Term Care Action Group, *Advocating for increased food handling staff hours in long term care homes: Essential for quality nutrition, hydration and dining care for our residents*, p. 11.



5.3.3 Need to Review the Meals, Snacks, and Fluids That Are Delivered

The meals delivered to residents were not always consistent with the meal plans (i.e., menus). We noted that in six facilities, the meal served on the day we visited was inconsistent with the menu. The menus were modified for various reasons. For example, in one facility, the ingredients needed for the planned meal were unavailable. In another facility, the cook was unhappy with the quality of food delivered by the supplier. A third facility had changed the menu substantially to suit the preferences of its residents.

It is reasonable for cooks to modify the menus when needed. However, it remains important that the food served to the residents provides them with the nutrients they require to remain healthy. Registered dietitians understand the nutritional value of food and how food impacts health conditions. Therefore, Five Hills should have registered dietitians regularly review the meals served in all the long-term care facilities to ensure residents are receiving the appropriate type and amount of food to meet nutritional standards. This will also give facilities the flexibility they need to serve meals their residents will enjoy while ensuring nutritional standards are met.

6. We recommend that Five Hills Regional Health Authority have modified menus regularly reviewed by a registered dietitian to confirm that meals served met nutritional standards.

Residents are offered plenty of fluids at each meal, with most residents having at least three or four choices (e.g., water, milk, juice, coffee and/or tea). Water is also made available in each of the residents' rooms. We note many residents require assistance from care staff to serve themselves water in rooms.

We noted that in one facility, the tap water, which was being served to residents, had a particularly foul smell and taste. Though water tests that had been done by the facility's town had not identified any risks to public health, the tests had identified high levels of sodium and dissolved solids, which can affect the smell and taste of water. Unappetizing water is particularly serious in a long-term care facility as residents require sufficient fluids to maintain good health. Water with a foul smell and taste discourages residents from drinking fluids, which can compromise their health. Since our visit to the facility, Five Hills has implemented a policy of using bottled water for serving residents and cooking where situations warrant it.

5.3.4 Meals Need to be Served at Appropriate Temperature and Texture

Five Hills has a policy to monitor the temperature of food before serving residents and to record the temperature of each food on the appropriate form. In six of the facilities we visited, we observed staff either not taking the temperature of food before serving or not properly documenting the temperature in writing. Measuring and tracking temperature is an important step of food preparation as it helps to prevent food borne illnesses due to bacteria and toxicants. If there were to be an outbreak in any of the facilities, the temperature of food served to residents could be an important indicator as to whether

the kitchen was the source of the outbreak. Regular safe food handling courses and food service monitoring policies may minimize this important step being missed.

Some residents require meals to be ground or pureed when served. For example, a resident with a choking hazard could be served a pureed meal. We found all residents with this requirement were appropriately served the prescribed meal texture (e.g., pureed foods). However, in two of the facilities we visited, we noted that pureed foods were inappropriately mixed together (i.e., mashed potatoes were mixed with pureed pork and pureed vegetables). This is inconsistent with Five Hills' policy and best practices for long-term care food services. The food should be offered individually so the resident is able to taste and smell each food flavor.

7. We recommend that Five Hills Regional Health Authority follow its policy and procedures to serve food at the appropriate temperature and texture.

5.3.5 Patients are Assisted as Needed

In every facility, care staff (nurses and care aides) were responsible for assisting residents during meal time. We found that staff sat while helping residents, made eye contact while talking to them, and treated them in a respectful manner. However, not all residents were assisted in a timely manner. In one instance, a resident was served the meal but was then left unattended. The resident was not assisted until at least 30 minutes after being served, resulting in the food being cold. Other residents were assisted with their meals, including dessert, before this resident was assisted. Five Hills needs to encourage care staff to assist residents in a more timely manner, or adjust the time when a meal is served closer to the time that care staff is able to assist residents.

8. We recommend that Five Hills Regional Health Authority provide timely assistance to residents to ensure all residents are served meals at the appropriate temperature.

We also noted that in all facilities it was the residents with higher needs who received the majority of staff attention. Those residents who did not require as much assistance physically eating did not receive as much attention (e.g., conversation, eye contact, etc.). To make meals more pleasurable for all residents, care staff should try to provide some attention to all residents.

5.3.6 Standard Method for Delivering Alternative Meals Needed

Residents are served alternative meals as required. For example, residents who require a gluten-free diet are served modified meals to meet their needs. However, as noted earlier, there is no standard method of tracking residents' dietary needs.



5.4 Better Monitoring of Food Services Needed

5.4.1 Periodic Assessments Need to be Done

The Five Hills Nutrition and Food Services Policy and Procedures Manual includes a quality improvement initiatives policy. The purpose is to ensure that high quality personnel and operational management practices exist and menus meet requirements. The manual indicates there are to be annual audits undertaken by Five Hills management in all facilities to ensure that facilities are following policies and procedures (e.g., an audit on meal service covering such things as serving food at the correct temperature, tasting food prior to service, holding food on steam table a maximum of two hours, etc.). According to the manual, a Quality Assurance Report is also required each year, to note findings, recommendations, and action plans. Staff at all facilities were unaware of this requirement for audits and Five Hills management confirmed that quality assurance audits have not been done for a number of years.

Like the rest of Saskatchewan's health regions, Five Hills is large and geographically diverse. As such, management cannot be present at all facilities on a regular basis. It is important for Five Hills to regularly review whether its procedures are followed in long-term care facilities.

9. We recommend that Five Hills Regional Health Authority follow its policy for quality improvement by conducting annual risk-based audits or reviews of food services.

As noted earlier, each facility also has public health inspections done on a regular basis (once or twice a year). The facilities of Five Hills have generally good public health inspection records. Our findings are consistent with these records.

Only one facility, an affiliate, conducts surveys of food service on an annual basis. Five Hills would also benefit from actively seeking input from residents and their families. Conducting regular surveys of those who depend on food services the most can help strengthen Five Hills' responsiveness to its clients. This could help ensure that its long-term care facilities are serving safe and nourishing food to their residents in a cost-efficient manner.

10. We recommend that Five Hills Regional Health Authority periodically survey residents and families of residents in all long-term care homes about food services.

5.4.2 Process to Review Complaints Needs to be Implemented

Five Hills has no formal process to receive and respond to complaints about food services in long-term care facilities. Complaints about food are handled informally, with nurses or care staff communicating preferences to dietary staff in ways that range from simple verbal communication to written memos. Changes may be made based on this information; however, there is no standard procedure for addressing complaints about food services. There is no formal documentation of complaints, or any documentation showing the complaint has been followed-up and resolved. Complaint trends are not monitored and opportunities for improvement are missed such as in the case of the foul smelling water as noted previously.

11. We recommend that Five Hills Regional Health Authority implement procedures to document, monitor, and address complaints about long-term care food services from residents and their families in all long-term care homes.

5.4.3 Unknown if Appropriate Corrective Action Taken

As noted above, Five Hills does not have a formal process to deal with complaints or incidents involving food service. Nor does it survey the residents and their families on the food service they receive. As a result, Five Hills may not be taking corrective action when needed. Once Five Hills implements procedures for handling complaints and conducting surveys, it needs to ensure that taking appropriate action is part of its procedures.

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