

Chapter 31

Social Services—Monitoring Quality of Care in Homes Supporting Adults with Intellectual Disabilities

1.0 MAIN POINTS

The Ministry of Social Services funds and licenses group homes and approved private service homes to provide accommodation, meals, and care to about 1,700 adults with intellectual disabilities (i.e., clients). At April 2024, the Ministry licensed about 280 group homes and 180 approved private service homes in Saskatchewan.¹

By April 2024, the Ministry made some progress in monitoring the quality of care provided to clients living in group and approved private service homes, but more work remains.

The Ministry developed a centralized tracking system for monitoring group homes' licensing information (e.g., licence expiry dates) and planned to update its system to also include licensing details for approved private service homes. We found the Ministry appropriately monitored home operators' resolution of deficiencies set out in conditional licences—at March 31, 2024, 18% of group homes and 20% of approved private service homes had conditional licences, compared to 45% and 70% in 2021 respectively.² The Ministry maintained regular contact with home operators who had conditional licences.

We found the Ministry implemented a revised home inspection checklist for group homes in April 2024 to include assessment of additional key risk areas (e.g., safety plans for clients at risk of wandering). However, it had yet to make similar updates to its inspection checklist for approved private service homes. Additionally, we found the Ministry continues to not inspect each group home annually, inconsistent with good practice, to assess whether each home meets minimum program standards for quality care.

Further, we continued to find inconsistencies in the Ministry's review of clients' person-centred plans (e.g., plans non-existent or outdated) and the Ministry lacked regular contact with clients. We also found the Ministry has yet to verify completion of periodic criminal record checks (including vulnerable sector checks) for staff working at group and approved private service homes.

While the Ministry developed a dashboard to better track serious incidents and now requires Ministry staff to document the physical address of where incidents occur, we found it needs to conduct further analysis to identify homes with more persistent concerns. In addition, the Ministry did not consistently follow up with home operators on implementing recommendations from serious incident reports.

Effective monitoring of care provided at Ministry-funded, licensed homes helps adults with intellectual disabilities to live meaningful and fulfilling lives, free from safety and health threats.

¹ At March 2021, the Ministry of Social Services licensed 253 group homes and 206 approved private service homes providing spaces for about 1,600 clients.

² During the COVID-19 pandemic, the Ministry of Social Services issued more conditional licences as many homes could not undergo third-party inspections (e.g., fire inspections) or in-person inspections by Ministry staff as the Government imposed visiting restrictions.



2.0 INTRODUCTION

2.1 Background

The Ministry of Social Services provides support for people with intellectual disabilities. *The Residential Services Act, 2019*, and *The Residential Services Regulations* give the Ministry authority to license, fund, and monitor residential service facilities (group homes and approved private service homes) providing services to people with intellectual disabilities.

The Ministry funds and partners with community-based organizations and other service providers across the province to deliver day programs such as supportive living programs and residential services. These partnerships include group homes, approved private service homes, and group living homes.³

For adults with intellectual disabilities, the Ministry, along with the individual, their family and other key people in the person's life determine a housing option suited to the individual based on their assessed need. Typically, adults living in Ministry-funded group and approved private service homes require greater care needs, often on a 24/7 basis.

In 2023–24, the Ministry spent about \$134 million on funding for group and approved private service homes. At March 2024, the Ministry licensed 282 group homes (with 1,318 spaces) and 181 approved private service homes (with 421 spaces) for adults with intellectual disabilities.^{4,5} The Ministry had 100 staff (e.g., case managers) involved in working directly with these homes and the adults they care for.

A group home operator, often referred to as an agency, service provider, or community-based organization, may operate a number of group homes. For the purposes of this chapter, unless otherwise specified, home operator refers to both agencies running group homes and individuals or families operating approved private service homes.

Providing safe housing and quality support for adults with intellectual disabilities contributes to a meaningful quality of life.

2.2 Focus of Follow-Up Audit

This chapter describes our first follow-up audit of management's actions on the recommendations we first made in 2021.

In 2021, we assessed the Ministry of Social Services processes to monitor whether Ministry-funded group homes and approved private service homes provide quality care to adults with intellectual disabilities and concluded the Ministry had effective processes, other than the areas reflected in our nine recommendations.⁶

³ A group living home is a home shared between adults who are individually responsible for paying basic shelter costs. Homes may receive Ministry funding for support staff as needed. Supportive living programs provide adults living in their own homes with limited support and supervision so they can live as independently as possible.

⁴ Data provided by the Ministry of Social Services.

⁵ At March 2021, the Ministry of Social Services licensed 253 group homes (with 1,206 spaces) and 206 approved private service homes (with 398 spaces).

⁶ *2021 Report – Volume 2, Chapter 18*, pp. 143–164.

To conduct this audit engagement, we followed the standards for assurance engagements published in the *CPA Canada Handbook—Assurance* (CSAE 3001). To evaluate the Ministry’s progress toward meeting our recommendations, we used the relevant criteria from the original audit. Ministry management agreed with the criteria in the original audit.

To carry out our follow-up audit, we discussed actions taken with management, reviewed relevant documentation (e.g., inspection checklists, policies), and analyzed data about licensed group and approved private service homes. We also examined client records, serious incident records, and the Ministry’s monitoring of homes with conditional licences.

3.0 STATUS OF RECOMMENDATIONS

This section sets out each recommendation including the date on which the Standing Committee on Public Accounts agreed to the recommendation, the status of the recommendation at April 30, 2024, and the Ministry of Social Services’ actions up to that date.

3.1 Improved Tracking and Monitoring of Licensing Information

We recommended the Ministry of Social Services use a central system to track key information about group and approved private service homes.

(2021 Report – Volume 2, p. 155, Recommendation 4; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

We recommended the Ministry of Social Services monitor resolution of deficiencies stated in conditional licences for group and approved private service homes within a reasonable timeframe. (2021 Report – Volume 2, p. 151,

Recommendation 1; Public Accounts Committee agreement February 27, 2023)

Status—Implemented

The Ministry of Social Services created a central system to track licensing information for group homes and planned to incorporate information about approved private service homes in 2024–25. It appropriately monitored home operators’ resolution of deficiencies set out in conditional licences (e.g., missing current fire inspection report).

The Ministry annually licenses homes providing care for adults with intellectual disabilities. It issues conditional licences when deficiencies or delays in receipt of required documentation occur during the annual licence renewal process. The Ministry issues conditional licences for a period up to six months, as management deems six months a reasonable timeframe for home operators to resolve deficiencies. We agree with this rationale. There are circumstances where the Ministry continues to issue conditional licences when deficiencies persist but monitors these circumstances closely.



In April 2024, the Ministry implemented a system dashboard to summarize licensing information for group homes. The dashboard includes details of homes' licensing activity (e.g., current licences, expired licences, conditional licences including information about outstanding requirements).

However, the Ministry had yet to incorporate similar information about licences for approved private service homes. It plans to update the system and create a dashboard during 2024–25 for approved private service homes, as well as include further information about all licensed homes, such as information about inspections (e.g., inspection dates, identified deficiencies, remediation dates).

We found the Ministry's system dashboard generates a monthly report identifying group homes with annual or conditional licences expiring during the month. The Ministry then communicates with relevant group home operators about meeting licensing requirements.

Our analysis of licensing data for group and approved private service homes between April 1, 2023, and March 31, 2024, found:

- The majority of homes had conditional licences on average about six months—194 of 282 group homes had at least one conditional licence, with an average length of six months; and 148 of 181 approved private service homes had at least one conditional licence, with an average length of five months
- 51 group homes (18%) and 37 approved private service homes (20%) had conditional licences at March 31, 2024—this is an improvement from our 2021 audit, where we found 45% and 70% of group and approved private service homes respectively had conditional licences

Additionally, we tested 15 homes operating with conditional licences and found:

- Ministry staff appropriately followed up timely with home operators before licence expiration to obtain required reports (e.g., fire inspection report) or updates on resolution of deficiencies.
- Nine homes held conditional licences due to delays in providing required documentation for annual licences (e.g., fire inspection report). On average, these homes held conditional licences for three months.
- Four homes held conditional licences for six months or less due to delays in addressing deficiencies identified during inspections (e.g., minor deficiencies with sprinkler systems).

We found two additional homes, operated by the same home operator, were on conditional licences for more than six months due to the homes undergoing extensive renovations—we found the Ministry appropriately maintained regular contact (i.e., every two weeks) with the operator regarding the progress of renovations, including Ministry-led inspections of the homes.

Effective monitoring of homes' compliance with licensing requirements helps ensure clients live in safe homes. Having a centralized system to track steps completed in the home

licensing process can help with monitoring licence expiration, completion of inspections, along with receipt and review of required documentation. It also allows the Ministry to collate and analyze common data about each licensed home and identify any persistent issues that may impact client care.

3.2 Home Inspection Checklist Updated, But Each Group Home Not Assessed Annually

We recommended the Ministry of Social Services update home inspection checklists to cover key risk areas at group and approved private service homes. (2021 Report – Volume 2, p. 153, Recommendation 2; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

We recommended the Ministry of Social Services annually inspect each group home to assess if it meets the minimum program standards requirements. (2021 Report – Volume 2, p. 154, Recommendation 3; Public Accounts Committee agreement February 27, 2023)

Status—Not Implemented

The Ministry of Social Services updated its home inspection checklist for staff to examine key risk areas at group homes, but had yet to update its home inspection checklist for approved private service homes. It continues to not require its staff to visit each group home at least annually to assess whether each home meets minimum program standards; there are 282 group homes with spaces for over 1,300 clients.

The Ministry conducts a program standards inspection as its primary tool to assess aspects of care for group home clients, such as meals provided, personal care, and the proper storing of personal records. In 2023, the Ministry developed a new program standards checklist for assessing whether group homes meet established program standards. It piloted the checklist for one group home operator in May 2023 and expected to start using it for all group homes' licence renewals starting in May 2024.

We found the Ministry's updated inspection checklist for group homes sufficiently addressed key risk areas such as the handling of medication (e.g., protocols for safe disposal of medication), maximum water temperature for clients' use (e.g., not to exceed 49 degrees Celsius), and safety measures for clients at risk of wandering (i.e., safety plans established).

The Ministry continues to use a separate checklist for annual inspections of approved private service homes, but it had yet to update this checklist to address key risk areas. The Ministry indicated it expects to develop a similar checklist for approved private service homes as it uses for group homes by October 2024.

Having comprehensive checklists to assess key home safety areas potentially impacting clients' health and safety is necessary to determine deficiencies and correct them before serious incidents occur.



One group home operator may operate more than one home (e.g., one group home operator in Regina operates 15 group homes). While the new program standards checklist for group homes acknowledges it is good practice to visit all licensed group homes for each operator annually, we found the Ministry continues to require a program standards inspection for a single home operator (at a minimum) and not of each home they operate.⁷ The Ministry indicated it continues to look for opportunities to increase the number of group homes it reviews annually through establishment of a quality assurance unit. In 2023–24, the Ministry inspected 104 out of 282 group homes.

Without regularly inspecting each group home to assess program standards, the Ministry may not know whether clients receive appropriate and quality care. This may lead to licensing group homes that do not meet minimum standards of care (e.g., medication inappropriately administered, poorly balanced meals).

3.3 No Verification of Completed Periodic Criminal Record Checks

We recommended the Ministry of Social Services verify completion of periodic criminal record checks for people caring for adults with intellectual disabilities living in group and approved private service homes. (2021 Report – Volume 2, p. 155, Recommendation 5; Public Accounts Committee agreement February 27, 2023)

Status—Not Implemented

The Ministry of Social Services does not verify completion of periodic criminal record checks for staff working at group and approved private service homes.

The Residential Services Regulations came into effect on January 1, 2023. The Regulations require group home operators to establish policies requiring criminal record and vulnerable sector checks for management, staff, and volunteers working with clients.⁸ The Regulations also require approved private service home operators to provide the Ministry with the results of criminal record and vulnerable sector checks for operators and other adults in the homes.

The Regulations do not outline requirements for periodic updates to criminal record checks.

The Ministry requires group home operators to establish policies requiring criminal record and vulnerable sector checks for management, staff, and volunteers working with clients. It also requires approved private service homes to present a criminal record check and a vulnerable sector check for all adults living in the home upon initial licensing. However, the Ministry indicated it is working to determine how often to require periodic criminal record and vulnerable sector checks for people providing services to people with intellectual disabilities in group and approved private service homes. It expects to establish a process to verify completion of periodic criminal record checks during 2024–25.

⁷ In our 2021 audit, we found the Ministry of Social Services annually inspects all approved private service homes, in contrast to requiring annual group home inspections for a single home operator and not of each home they operate.

⁸ A vulnerable sector check is a police information check to see whether a person has a record suspension (pardon) for sexual offences. rcmp-grc.gc.ca/en/types-criminal-background-checks (24 June 2024).

Lack of verification of periodic criminal record checks for people providing services to vulnerable populations such as adults with intellectual disabilities increases the risk of financial, physical, or sexual abuse.

3.4 New Standards to Assess Quality and Fulfillment of Person-Centred Plans in Development

We recommended the Ministry of Social Services periodically assess the quality and fulfillment of person-centred plans for adults with intellectual disabilities living in group and approved private service homes. (2021 Report – Volume 2, p. 158, Recommendation 6; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

We recommended the Ministry of Social Services have regular contact about the person-centred plans with adults with intellectual disabilities living in group and approved private service homes. (2021 Report – Volume 2, p. 158, Recommendation 7; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

The Ministry of Social Services has yet to adjust its standards for providing person-centred case management to adults with intellectual disabilities that not only directs Ministry staff to periodically assess person-centred plans, but also to meet with adults with intellectual disabilities (i.e., clients) about their plans.

We found the Ministry drafted standards for providing person-centred case management to adults with intellectual disabilities based on their assessed needs, desires, and goals.

As described in **Figure 1**, the draft standards establish three case management tiers to help the Ministry determine the frequency and level of client support it provides, including the expectation for Ministry staff (i.e., case managers) to review clients' person-centred plans every two years. We found the Ministry's draft standards include a checklist and examples to help its staff assess clients' progress toward meeting goals outlined in their person-centred plans.

Figure 1—Draft Case Management Tiers

Tier	Description	Timing and Frequency of Case Plans
Tier 1	Clients require minimal case management support from their case manager, are stable in services, and are unlikely to have planned or unplanned changes or have an emerging need within one year.	Case managers contact clients annually by telephone, email or mail to confirm their planning and support needs. Case managers should also review the person-centred plan every two years. Contact is documented in the case plan annually at minimum.
Tier 2	Clients require more active case management support from their case manager. These clients' supports are generally stable, but they may have a planned or unplanned change or have an emerging need within one year. They may have some multi-sector involvement but typically do not require their case manager to coordinate their case for more than one service.	Case managers have annual face-to-face contact with clients to discuss wellbeing, whether current services are meeting their person-centred needs, or whether they require new or different support. Case managers should also review the person-centred plan every two years. Contact is documented in the case plan annually at minimum.



Tier	Description	Timing and Frequency of Case Plans
Tier 3	Clients are in an unstable situation that requires the case manager's greatest focus. These clients may have employment but have not been working for a long period of time. They are likely to have planned or unplanned changes and typically have emerging needs within a year. There is likely to be multi-sector involvement requiring the case manager to actively coordinate services with them.	Case managers are in frequent contact with clients and their support network. The case plan will be updated with the most recent information regularly—a minimum of twice a year.

Source: Adapted from information provided by the Ministry of Social Services.

The Ministry indicated it plans to pilot these draft case management standards during 2024–25. Following the pilot, the Ministry expects to evaluate the standards, make necessary adjustments, and finalize the standards across the province in 2026.

Until implementation of the new standards, we found the Ministry continues to expect group and approved private service homes' staff to develop person-centred plans with their clients and review them at least every two years. The Ministry's case managers may provide support in developing person-centred plans.

Additionally, we found the Ministry continues to expect its case managers to have at least once a year contact with clients living at group homes and once every quarter with clients living in approved private service homes.

We tested 30 client records at the Ministry and found:

- Three client records did not include any person-centred plans
- Four client records had existing plans over two years old—with the oldest plan developed in 2015 and the most recent plan developed in 2022
- 14 client records did not have evidence of Ministry staff reviewing clients' person-centred plans or outcomes
- 11 client records indicated Ministry staff did not have regular contact with the clients (i.e., no contact within the last year)

Without periodically reviewing the person-centred plans and meeting with clients, the Ministry does not know whether clients receive quality care to live fulfilling lives. Furthermore, the Ministry may not know whether any issues or concerns exist if Ministry staff do not periodically visit or contact clients.

3.5 Further Analysis of Serious Incidents Needed

We recommended the Ministry of Social Services analyze serious incidents related to adults with intellectual disabilities for systemic issues at each group and approved private service home. (2021 Report – Volume 2, p. 163, Recommendation 9; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

The Ministry of Social Services developed a serious incident dashboard to better track serious incidents by location. However, the Ministry needs to conduct further analysis to identify homes with more frequent or persistent concerns.

Home operators self-report any serious incidents that impact clients' health and safety to Ministry staff. The Ministry investigates any allegations of abuse and/or neglect while tracking other serious incidents (e.g., illness) for informative purposes. As shown in **Figure 2**, each year, homes report various types of serious incidents to the Ministry.

Figure 2—Serious Incidents in Group Homes and Approved Private Service Homes, 2021–24

Incident type	Group Homes			Approved Private Service Homes		
	2021–22	2022–23	2023–24	2021–22	2022–23	2023–24
Denial of Opportunity ^A	4	2	16	7	6	6
Disease Outbreak	170	271	40	40	14	2
Disruption of Services	9	12	5	4	4	2
Emotional Abuse	18	39	43	9	9	9
Expected Death ^B	13	13	9	1	-	3
Fall	56	64	44	5	4	6
Medication Abuse	255	365	333	-	4	3
Missing/Wandering Person	39	35	39	8	8	5
Motor Vehicle Accident	4	1	1	-	1	-
Neglect	22	36	52	17	17	10
Other Injury	48	49	34	2	5	3
Physical Abuse	24	21	37	-	3	4
Poisoning	1	5	-	-	2	-
Property Abuse	2	6	4	6	-	2
Sexual Abuse	3	1	11	1	-	1
Suicide Attempt	3	15	21	-	-	2
Unexpected Death	15	17	22	1	1	2
Unexpected Illness	249	231	269	34	41	34
Total	935	1,183	980	135	119	94

Source: Adapted from information provided by the Ministry of Social Services.

Shaded rows indicate serious incidents the Ministry considers more critical and warrant an investigation. All these categories for group homes increased from 2021–22 to 2023–24.

^A Denial of opportunity is a form of abuse when homes' staff prevent a client from accessing some preferred activity for no valid reason. For example, staff purposefully stopping a client from joining other housemates in a pre-planned activity (e.g., swimming), despite the activity being in the client's best interest or a client's favoured activity would constitute a denial of opportunity, especially if stopped for malicious reasons.

^B An expected death refers to a client with a terminal illness diagnosis or who receives palliative care.

Since our 2021 audit, we found the Ministry developed a serious incident dashboard providing some analysis of serious incidents at group and approved private service homes. For example, the dashboard enables its staff to review the number of serious incidents by home operator, along with incident descriptions. In May 2024, the dashboard began sending weekly automated emails to Ministry management about serious incidents by home operator.



In addition, we found the Ministry implemented a new form for reporting serious incidents in April 2024. The new form requires Ministry staff to document the physical address of where the incident occurred—such information can help the Ministry to better identify homes with more frequent or persistent concerns when analyzing serious incidents.

While the Ministry currently has limited data to inform analysis by physical address, staff indicated they will comparably analyze incident data in 2024–25 of the various homes providing services to clients. Such analysis may consider the size of each home operator, location of incidents, and whether serious incidents reported are more concerning than others (e.g., emotional abuse versus unexpected illness) to identify homes with more or persistent issues. In the meantime, the Ministry relies on regional management (i.e., community services supervisors and managers) to identify homes with concerns on an ad hoc basis.

Limited or ad hoc analysis risks the Ministry not identifying homes with persistent issues, increasing the risk of missing homes providing unsuitable services for adults with intellectual disabilities that should not be licensed.

3.6 Implementation of Serious Incident Investigation Recommendations Not Sufficiently Monitored

We recommended the Ministry of Social Services monitor for timely implementation of recommendations, set out in serious incident investigation reports, at group and approved private service homes.

(2021 Report – Volume 2, p. 162, Recommendation 8; Public Accounts Committee agreement February 27, 2023)

Status—Partially Implemented

The Ministry of Social Services does not consistently follow up with home operators on their implementation of recommendations from serious incident reports. It plans to enhance its serious incident dashboard to help with monitoring recommendation implementation.

Consistent with our 2021 audit, Ministry case managers investigate allegations of abuse or neglect at approved private service homes, and support group home operators in investigating allegations at group homes. Upon completion of investigations, the Ministry receives a final report outlining conclusions and recommendations to address the incidents.

We tested eight serious incidents from 2023–24 that warranted an investigation and found:

- Staff from the Ministry or group home operators investigated all eight serious incidents and prepared final reports
- Six of the final reports included recommendations, however, not all recommendations included expected timelines for implementation

- Two of the final reports did not include recommendations—these related to incidents involving one group home operator with serious incidents involving several clients. In the case of this group home operator, we found it reasonable that the Ministry chose to closely monitor the operator for about six months (at the time of our testing), including unannounced visits to the homes and regular meetings with the group home operator’s senior management
- Ministry staff did not properly follow up with three home operators regarding timely implementation of recommendations (e.g., no evidence of follow up with home operators)

The Ministry indicated it plans to enhance its serious incident dashboard by adding more details about investigations, such as the status of implementation of recommendations, to help improve its monitoring and consistent follow up with home operators.

The Ministry not following up on and monitoring the status of serious incident recommendation implementation may lead to similar incidents reoccurring. Identifying delays in implementing corrective actions would provide the Ministry with important information about whether it needs to further support the home to prevent specific types of incidents from occurring.

