

Sedation Facility and Provider - Post-Inspection Guide

Introduction

This post-inspection guide was developed by the Royal College of Dental Surgeons of Ontario ("The College") to help sedation Facility Permit Holders understand what to expect after an inspection is conducted by the College's Facility Inspection Program.

We encourage you to review each section in detail as not every item may be applicable to your situation, the process steps for initial inspections and re-inspections are different.

The Facility Permit Holder is responsible for:

- Ensuring the facility has all protocols, procedures, equipment and drugs required by the *Standard of Practice for the Use of Sedation and General Anesthesia in Dental Practice* ("Standard of Practice")
- Ensuring all Sedation and General Anesthesia Providers comply with the *Standard of Practice*
- Receiving, reviewing and responding to all communications from the College staff and inspectors in a timely manner
- Complying with all direction from the Facility Inspection Program

Facility Inspection Program staff may request additional information and/or documents after the inspection has been completed. The Facility Permit Holder must comply with all requests by the deadline provided.

Note:

- All emails regarding inspections and record reviews must be exchanged through the College's secure email system. If you have questions about the secure email system, contact inspections@rcdso.org.
- Processing times may vary from the timelines outlined in this document. Processing times are typically longer around annual sedation renewal (end of January to April annually) and in December.

Initial Inspections (prior to Facility Permit being issued)

After the inspection, the College Inspector will complete a report. The Inspector sends the inspection report to Facility Inspection Program staff to be reviewed and processed.

Facility Inspection Program staff aim to process initial inspection reports within 2-4 weeks of the inspection date.

If the Facility Permit Holder or Representative has demonstrated the facility meets all requirements of the *Standard of Practice*, the Facility Permit Holder will receive an email confirming that the Facility Permit has been issued. Facility Permit Certificates are available for download from the Member Portal once they are issued.

If the Facility Permit Holder or Representative is unable to demonstrate the facility meets all requirements of the *Standard of Practice* and/or items required by the *Standard of Practice* are missing or inadequate, the Facility Permit Holder will receive an email outlining what they need to provide the College to demonstrate the facility is in compliance with the *Standard of Practice* before the Facility Permit is issued.

For initial inspections, this information is not posted to the Public Register.

The email will outline exactly what is needed to demonstrate the missing or deficient items or documentation have been addressed.

If any equipment or emergency drug(s) are missing or inadequate, the Facility Permit Holder will be asked to provide an itemized invoice or delivery slip and a photo of the item(s) as proof the item has been received. The invoice/delivery slip should have the facility address on it.

All correspondence regarding missing or inadequate items must be sent to inspections@rcdso.org, not the Inspector.

The subject line of all emails must include the facility account number. The body of the email must include the Facility Permit Holder's full name and RCDSO registration number.

Facility Inspection Program staff aim to process corrections 2-4 weeks after receipt of the documentation.

Once the Facility Permit Holder or Representative has demonstrated the facility meets all requirements of the *Standard of Practice*, the Facility Permit Holder will receive an email confirming that the Facility Permit has been issued.

The Facility Permit Holder must ensure sedation providers do not administer any sedation except minimal sedation, until after the Sedation Facility Permit has been issued.

Re-Inspections

There are two parts to re-inspections:

- 1) the facility re-inspection;
- 2) sedation record review(s).

Facility Re-Inspection

Following the re-inspection, the College Inspector will complete a report. The Inspector sends the re-inspection report to Facility Inspection Program staff to be reviewed and processed.

Facility Inspection Program staff aim to process re-inspection reports within 4-6 weeks of the re-inspection date.

If the Facility Permit Holder or Representative has demonstrated the facility meets all requirements of the *Standard of Practice*, the Facility Permit Holder will receive an email confirming the facility is in compliance and the re-inspection will be closed.

If the Inspector finds the facility has deficiencies and/or there has been a breach of the *Standard of Practice*, the Facility Permit Holder will receive an email outlining the deficiencies and/or breaches and describing what they need to provide the College to demonstrate the facility is in compliance with the *Standard of Practice*.

Typically, the Facility Permit Holder will be directed to ensure all sedation and anesthesia provider immediately cease administration of all sedation¹ at the facility.

¹ Cease administration of sedation means all sedation and anesthesia providers must refrain from administering any sedation or general anesthesia until the direction to cease is lifted.

All re-inspection deficiencies are posted to the Public Register until they are addressed by the Facility Permit Holder.

If any equipment or emergency drug(s) are missing or inadequate, the Facility Permit Holder will be asked to provide an itemized invoice or delivery slip and a photo of item(s) as proof the item have been received. The invoice/delivery slip should have the facility address on it.

The Facility Permit Holder may also be asked to provide other information or documentation if the Inspector finds other breaches of the *Standard of Practice* and/or College by-laws.

All correspondence regarding deficiencies must be sent to inspections@rcdso.org, not the Inspector.

The subject line of all emails must include the facility permit number. The body of the email must include the Facility Permit Holder's full name and RCDSO registration number.

Facility Inspection Program staff aim to process corrections 2-4 weeks after receipt of the documentation.

Once the Facility Permit Holder or Representative has demonstrated the facility meets all requirements of the *Standard of Practice*, the Facility Permit Holder will receive an email confirming the facility is in compliance with the *Standard of Practice*, any deficiencies posted to the Public Register will be removed and the re-inspection will be closed. The direction to cease the administration of sedation and general anesthesia will be lifted if there were no other concerns identified during the re-inspection.

Sedation Records

The Inspector will complete a sedation/anesthesia record review for each sedation provider that has

administered sedation or general anesthesia at the facility in the 36 months before the re-inspection.

Facility Inspection Program staff aim to process record review reports within 4-6 weeks of the re-inspection date.

Correspondence regarding the outcomes of record reviews is typically only sent to the sedation provider. The Facility Permit Holder will only be notified if the Facility Inspection Program identifies concerns or breaches that have broader implications for the compliance of the facility or patient safety.

If the sedation records for a particular sedation provider meet all requirements of the *Standard of Practice*, the sedation provider will receive an email confirming the sedation records they completed at that particular facility are in compliance.

If the Inspector finds the sedation records for a particular sedation provider have deficiencies and/or there has been a breach of the *Standard of Practice*, the sedation provider will receive an email outlining the deficiencies and/or breaches and describing what they need to provide the College to demonstrate to address the concerns. Depending on the nature of the deficiencies or concerns identified, Facility Inspection Program may:

- Provide the sedation provider feedback that they must incorporate into their sedation and record keeping practices going forward.
- Provide the sedation provider feedback that they must incorporate into their sedation and record keeping practices going forward and request additional sedation records demonstrating the have incorporated the feedback.
- Provide the sedation provider feedback and refer the concerns to the Registrar to determine whether an investigation should be appointed.

If the Facility Inspection Program requests additional records, the records must be sent to inspections@rcdso.org via the College's secure email system. The email must include both the corresponding facility permit number and the sedation provider's RCDSO registration number.

Questions?

Contact the Facility Inspection Program via inspections@rcdso.org. Please include your facility account number or Facility Permit Holder's registration number in the email.