



HASTINGS PRINCE EDWARD
Public Health



IPAC LAPSE COMPLAINT INVESTIGATIONS

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Typical Complaint Investigation

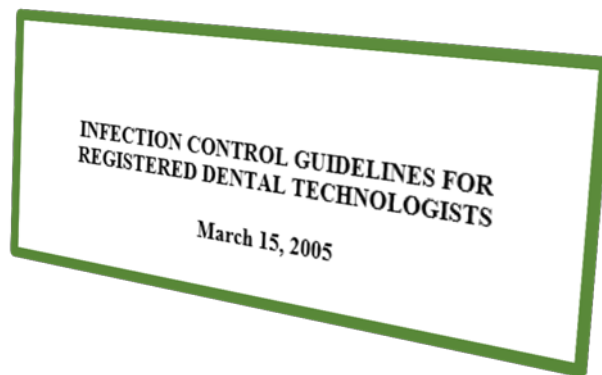
1. Interview the complainant
2. Inform regulatory colleges
3. Inspect the premise
4. Determine if IPAC lapse occurred
5. Issue a verbal and written order
6. Consult with MOH, PHO, MOHLTC
7. Provide a written report to owner/operator
8. Conduct a formal look back and client notification
9. Post an initial report on HPEPH website
10. Post a final report on HPEPH website

1. Interview the complainant

- Telephone on call system 24/7
- Respond to complaint within 24 hours
- Collect information
- Review if there are previous complaints or lapses for that premise
- Other forms of complaint can come from:
 - Referral from a regulatory college, PHO, MOHLTC, or another MOH
 - Epidemiologic link identified via communicable disease surveillance

2. Inform regulatory colleges

- Collaborative approach
- Royal College of Dental Surgeons of Ontario
- College of Dental Hygienists of Ontario
- College of Denturists of Ontario
- College of Dental Technologists of Ontario



3. Inspect the premise

- Short notice
- Advise premise re:
 - Cause for inspection
 - Authority
- Minimize disruption of clients
- Review practices
 - Reprocessing checklist
 - IPAC Core Elements checklist
 - Focus on the cause for complaint
- Instruct re: best practices
- One to three hour

CHECKLIST

Reprocessing in Dental Practice Settings

This checklist was developed as a tool to assist public health units and stakeholders in conducting inspections related to infection prevention and control lapse investigations. Unless otherwise indicated, the resource used was the Provincial Infectious Disease Advisory Committee's (PIDAC's) [Best Practices for Cleaning, Disinfection and Sterilization of Medical Equipment/Devices \(May 2013\)](#). Specific sections are cited for where the information may be found within the document.

The checklist was developed in collaboration with Royal College of Dental Surgeons of Ontario, The College of Dental Hygienists of Ontario and Ontario Ministry of Health and Long-Term Care. For more information about this resource, please contact ipac@oahpp.ca.

Clinic Name: _____

Clinic Address: _____

Date of Inspection: _____ Inspection Type: _____

Name of Inspector: _____

Clinic Contacts (name and phone numbers): _____

- **Legislated Requirement (Leg):** Must be compliant with the relevant Act or regulation (e.g., *Occupational Health and Safety Act*).
- **High Risk (High):** Immediate health hazard exists. Stop practice and correct immediately. The act or failure to act immediately may lead to the transmission of infection or risk of illness or injury. Practices that cannot be corrected immediately must be stopped until the health hazard is observed to have been eliminated. An Order may be warranted/ issued.
- **Medium Risk (Med):** Practices must be corrected. Timelines for compliance or agreement on alternate process to be determined during inspection.
- **Inform and Educate (I/E):** Provide information on best practices and mandatory legislated practice requirements. This may also include just-in-time education.

4. Determine if an IPAC lapse has occurred

- Lapse
 - “failure to follow IPAC practice standards resulting in a risk of transmission of infectious diseases” IPAC Disclosure Protocol, 2018
 - Practices identified as high risk on a PHO checklist
 - Substantial and immediate risk of transmission to clients or staff
- Deficiencies or breach
 - IPAC issues identified but MOH does not believe the breach would result in infectious disease transmission. Therefore there is no need to report.



5. Issue a verbal and written order (if necessary)

- Section 13 order
 - Issued under the *Health Protection and Promotion Act* R.S.O 1990 Ch. 7 as amended S. 13
 - Issued when a health hazard exists
- May include closure
- Report to MOHLTC within 1 business day

6. Consult with MOH, PHO, MOHLTC

- Medical Officer of Health
 - Confirm an IPAC Lapse has occurred
- Public Health Ontario
 - Assess the risk of transmission of BBP
- The Ministry
 - Involve other PHUs if multi-jurisdictional
- Regulatory Colleges
 - Inform re: findings and action



7. Provide written report to owner/operator

- Checklist items
 - Reprocessing
 - IPAC Core Elements
- Email summary
 - List of corrective actions/recommendations
 - Timeline for completion
 - Plan for re-inspection
 - Circumstances under which the order for closure will be lifted

8. Conduct formal look back and client notification

- Collaborate with owner/operator
- Assistance from PHO
- Options
 - Letter or email to clients
 - Scripted call
 - Dedicated call line
 - Media release



9. Post initial report on HPEPH website

- After preliminary client notification
- Within 2 weeks of lapse identified
- Accessible to the public
- Content
 - Date of complaint
 - Source (complaint, surveillance, referral)
 - Type of premises
 - Name and address of premises
 - 4 – 5 sentence description of the lapse
 - Referral to regulatory Colleges and Ministries
 - Corrective measures required
- Update with pertinent information



10. Post final report on HPEPH website

- After all aspects of the investigation have been completed
 - Clients contacted
 - Testing completed
- Within 2 weeks of confirmation that all corrective measures were taken
- In the same web location as the initial report
- Content
 - Corrective measures taken
 - Date corrective measure were confirmed



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