

Website Posting Compliance Checklist

May 2025

This checklist, designed as a companion resource to the Guide to Hospital Statutory Compliance, helps hospitals fulfill their online posting requirements under relevant legislation and regulations. It consolidates key statutory requirements that hospitals are obligated to publicly display on their websites.

This tool supports hospital legal counsel, risk management leads, and communication teams by providing a practical, easy-to-use reference to ensure compliance and transparency. Hospitals can use this checklist to verify that all necessary information is appropriately posted and maintained on their websites.

Accessibility Requirements

Under O. Reg. 191/11: *Integrated Accessibility Standards* under the *Accessibility for Ontarians with Disabilities Act* (AODA), hospitals must implement accessibility policies and multi-year planning to remove and prevent barriers.

Accessibility Policy Requirements (s 3)

Develop, implement, and maintain accessibility policies outlining how the hospital will achieve accessibility requirements

Include a statement of commitment to meeting accessibility needs of persons with disabilities in a timely manner in their policies

Prepare one or more documents describing the accessibility policies

Make these documents publicly available (e.g., by publishing on the hospital's website)

Provide documents in accessible formats upon request

Multi-Year Accessibility Plan and Annual Status Report (s 4)

Establish, implement, and document a multi-year accessibility plan with strategies to prevent and remove barriers

Review and update the multi-year accessibility plan every five years

Prepare an annual status report on implementation progress

Post both the accessibility plan and the annual status report on the hospital's website (if applicable)

Provide both documents in accessible formats upon request

Facilities and Environmental Requirements

Under O Reg 25/23: Broader Public Sector: Energy Reporting and Conservation and Demand Management Plans under the *Electricity Act*, hospitals must develop and post an Energy Conservation and Demand Management (CDM) Plan.

CDM Plan Requirements (s. 25.35.2; O Reg 25/23, s 3):

Develop an energy conservation and demand management plan

Obtain plan approval from the hospital's senior management team

Post the CDM plan on the hospital's website

Provide a printed version of the plan upon request

Health Care and Public Health Requirements

Hospitals must adhere to various regulations for patient safety, public health, and quality improvement.

Patient Safety Indicators (Reg. 965 under the *Public Hospitals Act*, s. 22.2)

Report diagnoses of hospital-acquired infection rates (e.g., C. difficile, MRSA, VRE, etc.) and others as prescribed by the government

Publicly disclose infection reduction activities (e.g., hand hygiene compliance, surgical safety checklist use)

Report standardized mortality rates and morality-related indicators as outlined in guidance documents and directives

Ensure indicators are disclosed on the hospital website according to specified timelines

For a detailed overview of the required patient safety indicators and up-to-date reporting timelines, refer to the [Patient Safety Indicator Reporting](#).

Declaration of Patient Values and Patient Relations Process (*Excellent Care for All Act*, ss. 6–7; O. Reg. 188/15)

Develop a declaration of patient values

Establish a patient relations process aligned with the declaration and regulations

Make publicly available both the patient declaration of values and patient relations process on the hospital website

Annual Quality Improvement Plan (QIP) (*Excellent Care for All Act*, s. 8; O. Reg. 187/15)

Develop an annual Quality Improvement Plan (QIP) in compliance with regulatory requirements

Consider critical incident data, patient surveys, and patient relations data in developing the QIP

At a minimum, QIPs must include measurable targets for the year ahead, including:

A rationale for selecting these targets

A description of how executive compensation is linked (where applicable) to achieving the stated targets

Any additional factors outlined in the applicable regulations (see O Reg 187/15 Annual Quality Improvement Plan)

Make the completed QIP publicly available by April 1 (commonly posted on the hospital's website)

Information, Privacy, and Access Requirements

Under the *Personal Health Information Protection Act, 2004* (PHIPA), hospitals, as health information custodians, are responsible for meeting specific privacy and access requirements related to personal health information.

Public Statement on Information Practices (s 16)

Provide a written public statement describing information practices.

Instructions for requesting access or correction of PHI

Instructions for filing a complaint

The statement must include:

Contact information for the designated person
(see s 15 for more details about the privacy officer
designation requirements)

Make the statement publicly available (commonly posted
on the hospital's website)

Public Sector Accountability, Operations, and Governance Requirements

Under the *Broader Public Sector Accountability Act, 2010* (BPSAA), hospitals must follow specific rules and timelines for posting expenses and attesting compliance.

Expense Rules and Posting (ss 8-11)

Ongoing requirements:

Establish expense rules in accordance with:

- The BPSAA
- Applicable regulations
- Guidelines or directives issued under the Act

Post the hospital's expense rules and all expense claims on the hospital's website

Biannual Expense Posting:

Hospitals must publicly post expense claims twice a year

By **November 30**: Post expenses for the reporting period of April 1 to September 30

By **May 31**: Post expenses for the reporting period of October 1 to March 31

Ensure each expense claim remains on the website for at least 2 years from the date of posting

The BPS Hospital Reporting Directive specifies the required details for expense claim postings, including information on travel, meals, and hospitality expenses reimbursed with public funds. This includes claims by designated individuals such as board members, the CEO, and senior executives.

Each expense claim must include:

- Type of expense
- Amount claimed
- Date incurred
- Description of the expense

Annual Attestation Requirements (s 15; BPS Hospital Reporting Directive, s 4)

Complete an attestation confirming compliance with the BPSAA, its regulations, and directives

Have the attestation approved by the hospital's board of directors

Post the attestation on the hospital's website by August 31 each year

For a detailed overview of the BPS expense posting and attestation requirements, refer to the Government of Ontario's website: [Broader public sector accountability](#).

Hospital Business Plan and Financial Documents

Under the *Broader Public Sector Business Documents Directive*, hospitals must complete and publicly post certain planning and financial documents each year.

Business Plan Requirements (Business Documents Directive, ss 4.1-4.3)

Prepare and post the Hospital Business Plan, which must include:

- The hospital's mandate and strategic direction
- An overview of current and future programs and key activities
- Performance measures and targets

Post the business plan annually **within 6 months** of the start of the hospital's fiscal year

Additional Business or Financial Documents

Prepare and post additional business or financial documents, which must include:

- A summary of key activities over the previous fiscal year
- An analysis of operational and financial performance
- Audited financial statements
- Outcome-based targets and mitigation strategies (if applicable)

Post these additional documents annually **within 6 months** of the end of the hospital's fiscal year

Prepare and submit an annual report to the Minister of Public Safety and Emergency Preparedness.

Include the required information set out in the Act.

Obtain board of directors' approval and attestation of the report

Ensure the board approves and attests to the report (s 11)

Publish the report in a prominent location on the hospital website

For more information about the annual reporting requirements, please see the OHA's guidance for Hospitals: *Fighting Against Forced Labour and Child Labour in Supply Chains Act* Guidance Document.

Alternate Fulfilment Option

If the above information is included in the hospital's annual report, that report may be used to meet the requirements (ss 4.2)

For more information about the annual reporting requirements, refer to the [Broader Public Sector Business Documents Directive](#).

Fighting Against Forced Labour and Child Labour in Supply Chains Act Reporting

Under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act), organizations who meet the definition of "entity" (s 2) and the criteria for reporting (s 9.2) must submit an annual report to the Minister of Public Safety and Emergency Preparedness containing the information set out in the Act.

Reporting Requirements:

- Determine if the hospital qualifies as a reporting "entity"
- Confirm the hospital meets the entity definition (s 2)
- Ensure the hospital meets the criteria for reporting (s 9.2)