

BAO Progress Report

Implementing recommendations of the Auditor General

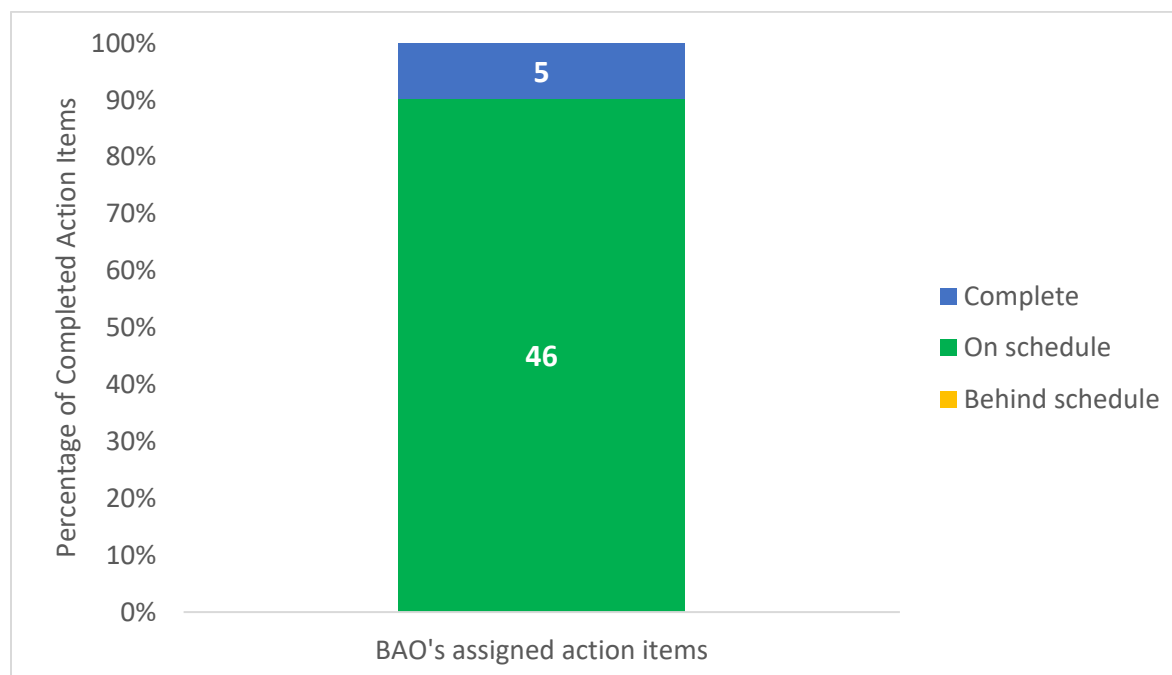
The Bereavement Authority of Ontario (BAO) is hard at work fulfilling its mandate to serve and protect public interest and govern the bereavement sector in the province.

Central to our drive for continual improvement in consumer protection is the audit by the Auditor General of Ontario, who issued 20 recommendations in her December 2020 report on the BAO. These 20 recommendations translated into 56 action items, including 5 action items for other ministries and parties to address. The remaining 51 action items are BAO's responsibility to address and are reported on in the following progress update. This includes 36 action items directed at the BAO, 11 action items directed at the BAO and the Ministry of Government and Consumer Services (MGCS), and 4 action items directed at the BAO and other ministries and parties. The implementation progress for each of these 51 action items will be reported publicly on a quarterly basis, including the status, steps taken and steps to be completed.

Refer to the [Auditor General's Report](#) for more detail on the recommendations.

BAO Implementation Plan on the Auditor General of Ontario's Value for Money Audit Recommendations

As of June 30 2021, the BAO has 51 action items on schedule for completion. There are no action items that are behind schedule.



Note: Statuses noted are based on the BAO's self-assessment. Final assessment will be completed by the Auditor General of Ontario.

Recommendation #1:

To protect consumers when making bereavement-related purchases, we recommend that MGCS work with the BAO to:

Action #	Action Item	Status
1.1	Develop effective strategies to increase the transparency of price information to consumers (such as requiring all licensed operators to provide their price lists online as well as an electronic copy or a link to the BAO's consumer information guide), and determine where it will be necessary as a result to amend legislation and/or regulations.	<i>In Progress (on schedule)</i> <i>Target completion – December 31, 2021</i>

Target Completion Date – December 2021Steps Taken

- *MGCS held consultations with bereavement sector stakeholders on proposals to increase price transparency for consumers*
- *Regulatory changes were made on April 6, 2021 to require, as of July 1, 2021, every bereavement service operator who maintains or makes use of a website to promote the sale or provision of, or enter into contracts for, the sale of licensed supplies or services to:*
 - *Ensure that an electronic version of the operator's price list is available, without charge, in a printable form, in a clearly visible place on the website; and*
 - *Ensure that a link to the consumer information guide prepared by the BAO Registrar is available in a clearly visible place on the website*
- *Reminded the bereavement sector of the regulatory changes to come into force on July 1, 2021*
- *Price comparison chart was posted on the BAO's website and promoted via social media*
- *Developed proposals for legislative and/or regulatory changes to improve price transparency for consumers, and discussed them with MGCS*
- *MGCS posted a [consultation paper](#) on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of this item. The consultation closed August 9, 2021*

Steps to be Completed

- *Regulatory changes made on April 6, 2021 come into force on July 1, 2021*

- *Follow up with licensees to confirm compliance with regulatory changes as of July 1, 2021*
- *Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations*

Recommendation #2:

To protect consumers when making bereavement-related purchases, we recommend that the BAO:

Action #	Action Item	Status
2.1	Standardize the presentation of price lists among all licensed operators and clearly identify whether each of them is required by law and in what circumstances, or if they are optional.	<i>In Progress (on schedule)</i> <i>Target completion – Sept. 30, 2021</i>
2.2	Conduct proactive and unannounced inspections of a sample of licensed operators to identify and deter upselling and/or other unethical practices or actions of non-compliance with legislation and regulations.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021 (Revised from Dec. 31, 2022)</i>

Target Completion Date – December 2022

Steps Taken

- *A sample Funeral Establishment price list template for the sector has been drafted and approved by the Registrar*
- *The Funeral Establishment price list template for the sector has been shared with the Funeral and Cemetery Advisory Committees*
- *Secret shopping script was finalized, and secret shoppers have been deployed in the sector to determine compliance*
- *Developed a proposal for legislative and/or regulatory changes to mandate price list adoption and use, and discussed with MGCS*
- *MGCS posted a [consultation paper](#) on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of this item. The consultation closed August 9, 2021*

Steps to be Completed

- *Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations*
- *Enforce mandatory compliance from sector licensees to post price lists in a standardized format, if legislative and/or regulatory changes are made*

Recommendation #3:

So that all cemetery operators that conduct business in Ontario are licensed to do so, and cannot be licensed if they are not operating appropriately, we recommend that the BAO:

Action #	Action Item	Status
3.1	Gather up-to-date contact information of all cemetery operators.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021 (Revised from Dec. 31, 2022)</i>
3.2	Follow up with all cemetery operators who did not renew their licenses in a timely manner and determine the reasons for non-compliance.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
3.3	Require all cemetery operators that are able to be licensed to renew their expired licenses or apply for a new one within a set timeframe.	<i>In Progress (on schedule)</i> <i>Target completion – Jun. 30, 2022 (Revised from Dec. 31, 2022)</i>
3.4	Make arrangements with local municipalities to take over those cemetery operators with expired licenses that cannot be located or are unable to continue managing their cemeteries in perpetuity.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>

3.5	Work with the Ministry of Government and Consumer Services (MGCS) to manage the remaining cemeteries that are considered to be abandoned under the <i>Funeral, Burial and Cremation Services Act, 2002</i> .	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
Target Completion Date – December 2022		
<u>Steps Taken</u> <ul style="list-style-type: none"> • <i>Obtaining contact details of all cemetery operators and identified contact details of all cemetery operators with no known contacts by working with the Association of Municipal Managers, Clerks and Treasurers of Ontario (AMTCO) and Association of Municipalities Ontario (AMO) to consider collaboration approach with municipalities</i> • <i>Work underway to investigate non-compliant licensee renewal and to email out Annual License Renewal forms</i> • <i>Developed proposals for legislative and/or regulatory changes with respect to the cemetery abandonment process, and discussed with MGCS</i> • <i>MGCS posted a consultation paper on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of this item. The consultation closed August 9, 2021</i> 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • <i>Cemetery site information to be updated</i> • <i>All cemetery operators who have not renewed their licenses to be contacted and suspended if necessary</i> • <i>Consultation with MGCS to consider approach to managing abandoned cemeteries that are located on land that is not within a municipality</i> • <i>Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations</i> 		

Recommendation #4:

To protect consumers' money deposited in care and maintenance funds maintained by cemeteries for upkeep of the cemeteries, we recommend that the BAO:

Action #	Action Item	Status
4.1	Make arrangements with all trustees of cemeteries to obtain access or disclosure of trustee statements directly from them.	<i>Completed</i>

		<i>Target completion – Jun. 30, 2021</i>
4.2	Perform inspections of cemeteries that did not submit their annual reports and other information on time and order them to comply with the legislation.	<i>In progress (on schedule)</i> <i>Target completion – Jun. 30, 2022</i>
Target Completion Date – June 2022		
<u>Steps Taken</u> <ul style="list-style-type: none"> • <i>Made arrangements with the largest trust companies in Ontario to request that they provide their cemetery care and maintenance trust statements directly to the BAO, on behalf of licensees</i> • <i>To cover the remaining smaller trust companies, BAO contacted all licensees to request that they make arrangements with their trust company so that their cemetery care and maintenance trust statements are sent directly to the BAO from the trust, on behalf of licensees</i> • <i>Work underway on expanding inspector watchlists, increasing the number of annual inspections and applying digital technologies to track inspections and flag high-risk operators</i> 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • <i>Work to expand inspector watchlists, increase the number of annual inspections and apply digital technologies to track inspections and flag high-risk operators to be completed</i> • <i>Inspections of late-filing cemeteries to be performed</i> • <i>Filing of annual reports to be incorporated into the annual inspection plan being developed</i> 		

Recommendation #5:

To protect consumer funds held in trust by funeral homes and transfer services, we recommend that the BAO:

Action #	Action Item	Status
5.1	Perform inspections, or impose conditions or other appropriate consequences, if funeral homes or transfer services do not file reports on prepaid funds within 90 days after their fiscal year end, or fail to take timely action to correct identified deficiencies.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
Target Completion Date – December 2021		
<u>Steps Taken</u> <ul style="list-style-type: none"> <i>Work underway on performing inspections of late filers</i> <i>Work underway on planning email campaigns to late filers</i> 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> <i>Launch targeted inspections of late filers</i> <i>Undertake email campaigns to late filers</i> <i>Inspection rules for late report filers to be incorporated into the annual inspection plan</i> 		

Recommendation #6:

To protect consumers through its inspection efforts, we recommend that the BAO use the analyses from its inspection results to:

Action #	Action Item	Status
6.1	Establish an annual inspection plan that targets high-risk areas for inspection, and specifies the percentage of inspections to be reactive and proactive, and how inspections are prioritized based on risk, urgency, and severity of potential non-compliance.	<i>In Progress (on schedule)</i> <i>Target completion – Sept. 30, 2021</i>
Target Completion Date – September 2021		
<u>Steps Taken</u>		

<ul style="list-style-type: none"> • Meetings with compliance team are underway • A preliminary risk-based inspection plan has been developed
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • Annual inspection plan to be finalized

Recommendation #7: To improve the accuracy and reporting of inspection statistics, we recommend that the BAO:		
Action #	Action Item	Status
7.1	Restate and provide the correct number of inspections in its Annual Report for all previous years.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
7.2	Conduct periodic verification of inspection counts.	<i>In Progress (on schedule)</i> <i>Target completion – Jun. 30, 2022 (Revised from Dec. 31, 2021)</i>
7.3	Track all trigger events for inspections in one place.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
7.4	Track, monitor, analyze inspections by types and non-compliance.	<i>In Progress (on schedule)</i> <i>Target completion – Jun. 30, 2022 (Revised from</i>

		Sept. 30, 2021)
7.5	Publicly report on outcomes of inspections.	In Progress (on schedule) Target completion – Dec. 31, 2024
Target Completion Date – December 2024		
<u>Steps Taken</u> <ul style="list-style-type: none"> • Work underway to implement a digital tracking system for inspections • Weekly inspection meetings are being conducted by BAO compliance, and inspection teams to discuss how to track potential inspections that arise out of complaints or late filings 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • Annual reports to be updated • Weekly inspection meetings to continue • A detailed work plan to implement a new Customer Relationship Management (CRM) software system capable of tracking inspections to be developed 		

Recommendation #8

To help protect consumers against financial harm and increase deterrence, we recommend that the BAO:

Action #	Action Item	Status
8.1	Review and shorten its existing one-year internal policy to follow up on significant non-compliance issues.	In Progress (on schedule) Target completion – Dec. 31, 2021
8.2	Place appropriate conditions on operators based on the type and severity of their violations if deficiencies are not corrected in accordance with its internal policies.	In Progress (on schedule)

		Target completion – Dec. 31, 2021
8.3	Work with the MGCS to adopt best practices from other jurisdictions to expand enforcement tools, such as the ability to levy an administrative penalty.	In Progress (on schedule) Target completion – Sept. 30, 2022
8.4	Provide the public with more details on licensing and enforcement decisions and actions taken against licensed and non-licensed operators, with the privacy of the families being protected.	Completed Target completion – Jun. 30, 2021
Target Completion Date – September 2022		
<u>Steps Taken</u> <ul style="list-style-type: none"> • More stringent conditions on non-compliant licensees have been introduced • Developed guidelines that are available on the BAO's public website on what level of detail, duration and placement will be provided for licensing and enforcement actions • Undertook discussions with MGCS on best practices regarding enforcement tools • MGCS posted a consultation paper on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of this item. The consultation closed August 9, 2021 • Establishment of Discipline and Appeal committees (members have been appointed) 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • Internal policy on when to follow up on significant non-compliance issues has to be developed • Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations • Training to be provided to the Discipline and Appeal committees in late 2021, and full committee operations to be rolled out in 2022 		

Recommendation #9

To assess the sufficiency of caseloads and to improve the quality of work done by inspectors, we recommend that the BAO:

Action #	Action Item	Status
9.1	Establish a system to track and measure inspector time and workload.	<i>In Progress (on schedule)</i> <i>Target completion – Jun 30, 2022 (Revised from Dec. 31, 2021)</i>
9.2	Compare the actual time against budgeted time spent per inspection and identify reasons for significant discrepancies.	<i>In Progress (on schedule)</i> <i>Target completion – Sept. 30, 2022</i>
9.3	Regularly review inspectors' caseloads and quality of work to identify areas for improvement in resource allocation and for training purposes.	<i>In Progress (on schedule)</i> <i>Target completion – Jun 30, 2022 (Revised from Dec. 31, 2021)</i>
9.4	Require inspectors to complete their files and save all the supporting documents on a timely basis.	<i>In Progress (on schedule)</i> <i>Target completion – Jun 30, 2022 (Revised from Dec. 31, 2021)</i>
9.5	Document managerial reviews on each inspection file and make improvements as needed.	<i>In Progress (on schedule)</i> <i>Target completion – Jun 30, 2022</i>

		<i>(Revised from Dec. 31, 2021)</i>
9.6	Conduct a performance review, at least annually, for each inspector.	<i>In Progress (on schedule)</i> <i>Target completion – Sept. 30, 2021</i>
Target Completion Date – September 2022		
<u>Steps Taken</u> <ul style="list-style-type: none"> <i>Time tracking policy and software have been implemented for inspectors</i> <i>Review of inspectors' caseloads and work quality has been prepared and first performance reviews of inspectors conducted using BambooHR software</i> <i>Managerial reviews on inspection files have been documented</i> 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> <i>Discrepancies in actual versus budgeted inspection time to be investigated</i> <i>Written policies requiring timely documentation of workload to be developed</i> 		

Recommendation #10: To better measure the effectiveness of its inspection role and make improvements where and when needed, we recommend that the BAO:		
Action #	Action Item	Status
10.1	Measure and monitor additional performance measures, such as the number of inspections by type, and average time spent per inspection, time taken to correct non-compliance issues and percentage of compliance rate as a result of inspections.	<i>In Progress (on schedule)</i> <i>Target completion – Sept. 30, 2022</i>
Target Completion Date – September 2022		
<u>Steps Taken</u> <ul style="list-style-type: none"> <i>Performance measures of other delegated administrative authorities have been reviewed</i> 		

Steps to be Completed

- *A list of initial performance measures that can be tracked currently and a “wish list” of performance measures to be tracked in a new CRM software system to be developed*
- *Revised performance measures to be submitted to the ministry for approval*
- *The ministry to review the BAO’s proposed performance measures, as part of a broader review of the performance measures of most administrative authorities under the ministry's oversight.*

Recommendation #11

To better track and monitor all consumer complaints and inquiries so that they are addressed on a timely basis, we recommend that the BAO:

Action #	Action Item	Status
11.1	Establish a formal policy to define which kind of inquiry should become a complaint, and what kind of complaint should be forwarded for an inspection.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
11.2	Upgrade the functionality of its information system so that summary reports on the number and nature of complaints can be produced electronically.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
11.3	Instruct staff to record and update the status of complaints and inquiries consistently, accurately, and in a timely way.	<i>Completed</i> <i>Target completion – Jun. 30, 2021</i>
11.4	Review the actual time taken to process complaints and establish a more reasonable turnaround time target.	<i>Completed</i> <i>Target completion – Sept. 30, 2021</i>

Target Completion Date – December 2022
<p><u>Steps Taken</u></p> <ul style="list-style-type: none"> • <i>IT consultant has been hired to upgrade IT system</i> • <i>Developed training documents and conducted training for the BAO's complaints team. Staff training undertaken to record and update the status of complaints and inquiries consistently, accurately, and in a timely way</i> • <i>Internally established a turnaround target of 60 days</i>
<p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> • <i>A new CRM software system is to be developed</i> • <i>Formal policy to be updated to define escalation criteria for complaints</i>

Recommendation #12: To effectively address any large-scale death event such as a natural disaster or non-natural event, we recommend that the Office of the Chief Coroner, working with the BAO:		
Action #	Action Item	Status
12.1	Revisit the Provincial Mass Fatality Plan and incorporate any key information, inputs and lessons learned from the provincial response to the COVID-19 pandemic by the BAO.	<i>In Progress (on schedule)</i> <i>Target completion – December 31, 2021</i>
Target Completion Date – December 2021		
<p><u>Steps Taken</u></p> <ul style="list-style-type: none"> • <i>The Office of the Chief Coroner consulted with the BAO on the Provincial Mass Fatality Plan (the Plan) in September 2020. The BAO's feedback was incorporated into the Plan at that time</i> 		

Recommendation #13: To carry out its licensing regulatory role, we recommend that the BAO:
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Action #	Action Item	Status
13.1	Require all transfer service providers to be licensed across the province.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
Target Completion Date – December 2021		
<u>Steps Taken</u> <ul style="list-style-type: none"> • <i>Hybrid licence class (Restricted Transfer Service) has been developed using the Registrar's conditions of licensure</i> • <i>Worked with Humber College to develop an education system for Restricted Transfer Service operators</i> • <i>Online trainings for all Restricted Transfer Service licensees started on June 1</i> 		
<u>Steps to be Completed</u> <ul style="list-style-type: none"> • <i>All individuals eligible for the hybrid licence will be licensed on condition that they complete the Restricted Transfer Service course offered by Humber College</i> 		

Recommendation #15:

To help protect the environment and comply with the Environment Protection Act, we recommend that the Ministry of Environment, Conservation and Parks (Environment Ministry:

Action #	Action Item	Status
15.1	Cross-check its lists for Environmental Compliance Approvals with the list of crematoriums maintained by the Bereavement Authority of Ontario to ensure that the lists are complete	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
Target Completion Date – December 2021		
<u>Steps Taken</u>		

- BAO licensing staff member provided the Ministry of Environment, Conservation and Parks (MECP) with a list of crematoriums
- MECP agreed to notify BAO of any problems that arise during investigations
- Meeting with MECP has taken place
- BAO has developed a policy to provide MECP with crematorium list on an annual basis

Steps to be Completed

- MECP to contact BAO to discuss next steps after they have developed an implementation plan

Recommendation #16

To help protect the environment and comply with the Environmental Protection Act, we recommend that the BAO work with the Ministry of Environment, Conservation and Parks (MECP) to:

Action #	Action Item	Status
16.1	Verify that all licensed funeral homes (Class 1) possess a current hazardous waste generator number.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
16.2	Verify that all licensed funeral homes (Class 1) with a hazardous waste generator number, but without any declared hazardous waste generation, dispose of hazardous waste properly.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>

Target Completion Date – December 2021

Steps Taken

- Consultation with MECP underway
- Provided licensees with a how-to guide on Hazardous Waste Information Network (HWIN) usage, [sent March 3, 2021](#)
- Surveys sent to the licensed funeral homes to obtain their hazardous waste generator number

Steps to be Completed

- *Inspection procedures to be updated to include oversight on hazardous waste*
- *Verification of proper disposal of waste using the licensed funeral homes hazardous waste generator numbers*

Recommendation #17

To protect the public and the environment, we recommend that the MGCS work with the BAO to:

Action #	Action Item	Status
17.1	Conduct research on emerging technologies for disposing of human remains.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
17.2	Allow for licensing to be delayed until the safety of the new technology is determined and decide on amendments to the legislation and/or regulations where needed.	<i>In progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>

Target Completion Date – December 2022

Steps Taken

- *Jurisdictional scan in respect of action 17.2 has been undertaken by MGCS*
- *Undertook discussions with MGCS on these recommendations*
- *MGCS posted a [consultation paper](#) on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of action 17.2. The consultation closed August 9, 2021*

Steps to be Completed

- *Continue to engage MGCS in discussions about approach to undertake research*
- *Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations*

Recommendation #18

To implement appropriate provincewide inspection processes and coverage of the bereavement sector, we recommend that the BAO:

Action #	Action Item	Status
18.1	Consult and collaborate with local public health units and the Ministry of Labour to re-examine the purposes and necessity of various inspections.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
18.2	Estimate the costs of comprehensive inspection covering all key areas if they were mainly carried out by the BAO.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
18.3	Review the licensing fees needed to cover the estimated cost of comprehensive inspection function.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>
18.4	Establish a memorandum of understanding with public health units and the Ministry of Labour to specify their new roles and responsibilities over inspection.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>

Target Completion Date – December 2022

Steps Taken

- *Meetings with the Ministry of Health (MOH) have taken place*
- *Initial outreach to the Ministry of Labour, Training and Skills Development (MLTSD) has taken place*

Steps to be Completed

- *BAO to work with the MLTSD, MOH and public health units*

Recommendation #19

To improve the oversight of the BAO and increase consumer representation, we recommend that the MGCS work with the BAO to:

Action #	Action Item	Status
19.1	Increase public awareness of the BAO.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
19.2	Establish additional performance measures and targets to evaluate its effectiveness in achieving its mandate.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021 (Revised from Sep. 30, 2022)</i>
19.3	Approve agreed-upon regulation changes in a timely manner.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
19.4	Effectively communicate and consult with each other regularly on key areas.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021</i>
19.5	Reduce the number of Board members to the appropriate staffing ratio.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2022</i>

19.6	Elect or appoint Board member(s) who advocate for consumers.	<p><i>In Progress (on schedule)</i></p> <p><i>Target completion – Dec. 31, 2022</i></p>
Target Completion Date – December 2022		
<p><u>Steps Taken</u></p> <ul style="list-style-type: none"> <i>Regular meetings between MGCS and the BAO are underway to communicate on key areas</i> <i>BAO has provided feedback on a number of MGCS consultations (e.g., on potential changes to the cemetery care and maintenance fund framework, in respect of increasing transparency for consumers of bereavement services)</i> <i>Performance measures of other delegated administrative authorities and other provincial bereavement regulators have been reviewed</i> <i>Regulatory changes were made to the cemetery care and maintenance fund framework, effective on Jan 1, 2022</i> <i>Regulatory changes were made to license display and price transparency requirements, effective on July 1, 2022</i> <i>Social media campaigns and radio advertising used to increase public awareness of the BAO</i> <i>Board discussions underway about the potential to change board size and composition</i> <i>MGCS posted a consultation paper on the Regulatory Registry on June 25, 2021, which includes potential proposals in respect of this item (increasing awareness of the BAO). The consultation closed August 9, 2021</i> 		
<p><u>Steps to be Completed</u></p> <ul style="list-style-type: none"> <i>Meetings between the BAO Registrar and the Board to discuss and finalize additional performance measures</i> <i>A list of initial performance measures that can be tracked currently and a “wish list” of performance measures to be tracked in a new CRM software system to be developed</i> <i>Revised performance measures to be submitted to the ministry for approval</i> <i>The ministry to review the BAO’s proposed performance measures, as part of a broader review of the performance measures of most administrative authorities under the ministry’s oversight.</i> <i>Meetings between MGCS and BAO to discuss potential legislative and/or regulatory changes, based on the outcome of stakeholder consultations</i> <i>Board to finalize decision on board size and composition</i> 		

Recommendation #20

To improve the Board oversight of the BAO with a mandate to protect consumers, we recommend the Board of Directors:

Action #	Action Item	Status
20.1	Regularly evaluate the effectiveness of the BAO in achieving its mandate by obtaining and reviewing complete, accurate and up-to-date information to make decisions.	<i>In Progress (on schedule)</i> <i>Target completion – Dec. 31, 2021 (Revised from Sep. 30, 2022)</i>
20.2	Re-evaluate the need and cost-effectiveness of establishing the Discipline Committee and the Appeal Committee (D&A).	<i>Completed</i> <i>Target completion – Jun. 30, 2021</i>

Target Completion Date – December 2021Steps Taken

- Board is moving forward with D&A committees
- The Terms of Reference for D&A committees were approved in January 2021
- [Call for nominations](#) to solicit members was published in February 2021
- Obtained Board input on regulatory operating framework in June 2021
- Board approved membership of D&A committees.

Steps to be Completed

- D&A committees to receive training before commencing operations
- Management to work with the Board to determine performance metrics required
- Board to finalize revamped strategy in February 2022