


| | | |
|---|---|---|
|  <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>PRIMARY HEALTH CARE OPERATIONAL GUIDELINE</p> | <p>Operational Guideline: Manitoba Family Physician Chart Review</p> | <p>Guideline Number: PCOG#36</p> |
| | <p>Approved By: Primary Care Service Area Leadership</p> | <p>Pages: 1 of 4</p> |
| | <p>Approval Date: May 30, 2022</p> | <p>Supercedes: February 23, 2021</p> |

1. INTENT:

To provide both Physicians and Primary Care Team Managers with a standard and consistent approach to follow when a Physician has been selected to participate in a mandatory chart review by the College of Physicians and Surgeons of Manitoba (CPSM) through their Quality Improvement (QI) Program.

2. BACKGROUND:

The mandate of the CPSM is to protect the public as consumers of medical care and to promote the safe and ethical delivery of quality primary care by Physicians in Manitoba. Part of this mandate involves supervising the practice of medicine of the CPSM members. As such, the CPSM commenced a new QI Program in January 2019 which all Physicians will be regulated to participate in over time. The QI Program operates on a seven year cycle.

As part of the QI Program, some Physicians will undergo a chart review (either off-site or on-site) to assess the quality of their medical record keeping and their practice. For those Physicians working on an Electronic Medical Record (EMR), the most effective and efficient way to conduct a chart review is via remote access of the EMR. The CPSM has worked with the Shared Health Privacy Office, Primary Care Service Area Leadership, Digital Health, Community Health Information Management, Primary Care Information Systems (PCIS) and EMR Support Services (ESS) to ensure the remote access process is efficient and acceptable from a privacy perspective and is compliant with *The Personal Health Information Act (Manitoba)*.

This operational guideline has been developed to ensure those involved in the Physician chart review process within the WRHA Primary Care Direct Operated Clinics are informed of what the process entails and what their role may include.


3. GUIDELINE:

3.1 To support sites and staff, ***APPENDIX A - CPSM Quality Improvement Program Chart Review Algorithm*** summarizes the responsibilities by role for those involved in the chart review process.

3.2 Each Physician selected by the CPSM to participate in the QI Program will be asked to complete a questionnaire about their practice. Standard information requested on the questionnaire includes:

- Approximately how many patients do you have in your practice?
- What is the gender distribution of your practice?
- What is the age distribution of your practice?
- List the five most common medical diagnoses which you see in your office.

To assist the Physician in providing this information, a report is available on the EMR Report Server titled *CPSM Quality Improvement Program Practice Information*. This

| | | |
|---|---|---|
|  <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>PRIMARY HEALTH CARE OPERATIONAL GUIDELINE</p> | <p>Operational Guideline: Manitoba Family Physician Chart Review</p> | <p>Guideline Number: PCOG#36</p> |
| | <p>Approved By: Primary Care Service Area Leadership</p> | <p>Pages: 2 of 4</p> |
| | <p>Approval Date: May 30, 2022</p> | <p>Supercedes: February 23, 2021</p> |

report is accessible by the Primary Care Team Manager and can be generated on behalf of a Physician upon request. The report once generated, should be provided to the Physician to assist them in completing the questionnaire.


Off-Site Chart Reviews

- 3.3 In addition to the above questionnaire, some Physicians may receive a letter from the CPSM requiring the Physician to participate in an off-site chart review by submitting names of 5 patients with specific diagnoses. The Physician could identify the patients:
- From personal knowledge of their practice; or
 - By selecting from a list of their patients with the specified diagnoses. Any Physician requiring assistance can contact ESS through Service Desk servicedesk@sharedhealthmb.ca for support in generating the patient list. The Physician would be responsible for selecting 5 patient names from the list to submit to the CPSM.

- 3.4 In addition to forwarding the 5 patient names to the CPSM, the Physician must provide these patient names to the responsible Primary Care Team Manager for future EMR auditing purposes.

On-Site Chart Reviews

- 3.5 Alternatively, some Physicians may receive a letter from the CPSM advising them that a half-day on-site chart review will be scheduled and a mutually agreed upon date is determined. The CPSM will request that the Physician advise the responsible Primary Care Team Manager of the upcoming chart review for planning purposes around space requirements. The on-site chart review will involve the following steps:
- On the agreed date, one or two CPSM auditors will accompany the CPSM Medical Consultant to the practice location where the CPSM auditor(s) will conduct the chart review
 - On the date of the chart review, the Physician will be asked to provide the names of 15-20 patients chosen from a recent schedule (dates provided at time of chart review) as well as 5 charts in areas of key diagnoses
 - The Physician must provide a listing of names for all patient charts accessed during the chart review to the responsible Primary Care Team Manager for future EMR auditing purposes
 - The CPSM chart review team will also complete an inspection of the facility and ask questions to better understand how the clinic operates
 - Upon completion, an interactive meeting will take place between the CPSM Medical Consultant, the CPSM auditor(s) and the Physician to discuss the chart review
- 3.6 Given the current COVID-19 pandemic restrictions, the on-site review process (as noted in #3.5 immediately above) **has been temporarily adapted to be completed virtually until such time it is deemed safe to conduct chart reviews on-site again.** The on-site audit becomes an off-site audit at the CPSM offices.

| | | |
|---|---|---|
|  <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>PRIMARY HEALTH CARE OPERATIONAL GUIDELINE</p> | <p>Operational Guideline: Manitoba Family Physician Chart Review</p> | <p>Guideline Number: PCOG#36</p> |
| | <p>Approved By: Primary Care Service Area Leadership</p> | <p>Pages: 3 of 4</p> |
| | <p>Approval Date: May 30, 2022</p> | <p>Supersedes: February 23, 2021</p> |

- The Physician will be provided with an *Office Assessment Form* (inspection of facility form) and expected to complete and submit in advance of the scheduled chart review
- The Physician will also be asked to provide patient names in advance of the chart review date, which meet specific criteria (date of visit/diagnoses)
 - The Physician must provide a listing of names for all patient charts accessed during the chart review to the responsible Primary Care Team Manager for future EMR auditing purposes
- Upon completion, an interactive virtual meeting will take place between the CPSM Medical Consultant, the CPSM auditor(s) and the Physician to discuss the chart review

Privacy and Confidentiality

3.7 Privacy and confidentiality are of utmost importance to the CPSM. Any auditor working with the CPSM is required to sign a *Declaration of Confidentiality* agreement. Other safeguards include:


- Digital Health is contacted by the CPSM via email prior to any chart review being scheduled. The CPSM does not proceed until confirmation of access to the EMR is granted to the CPSM auditor(s) for a specific date and specific clinic.
- The CPSM auditor will have read-only access for a twenty-four hour period during which time the chart review will be completed. The CPSM auditor will have a unique log in identity which will permit auditing of the information accessed. Access (activate/deactivate) will be coordinated by Digital Health.
- All chart reviews will be completed on CPSM-owned laptop computers to ensure the security and confidentiality of the information.
- EMR user audits will be coordinated by ESS after each chart review to ensure the CPSM reviewer only accessed the appropriate patient files. Audit reports will be generated by ESS and forwarded to the responsible Primary Care Team Manager for completion and return.
- The Primary Care Team Manager will forward any potential audit breach concern to the CPSM at quality@cpsm.mb.ca for investigation, to Digital Health at servicedesk@sharedhealthmb.ca for deactivation of reviewer access pending outcome of the investigation and to the Primary Care Program Specialist for awareness. In addition, all confirmed privacy breaches must be documented in the RL Solutions database by the Privacy Officer conducting the investigation per WRHA Regional Policy [#10.40.110 Reporting and Investigating Privacy Breaches and Complaints](#).

4. APPENDIX:

- **APPENDIX A** – CPSM Quality Improvement Program Chart Review Algorithm

5. REFERENCE:

- Consultation between Primary Care Service Area Leadership, College of Physicians and Surgeons of Manitoba, EMR Support Services, Shared Health Chief Privacy Officer, Digital Health, Community Health Information Management and Primary Care Information Systems

| | | |
|---|---|---|
|  <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>PRIMARY HEALTH CARE OPERATIONAL GUIDELINE</p> | <p>Operational Guideline: Manitoba Family Physician Chart Review</p> | <p>Guideline Number: PCOG#36</p> |
| | <p>Approved By: Primary Care Service Area Leadership</p> | <p>Pages: 4 of 4</p> |
| | <p>Approval Date: May 30, 2022</p> | <p>Supercedes: February 23, 2021</p> |

SCOPE:

Applicable to any Physician working within a WRHA Primary Care Direct Operated Clinic.

NOTE:

While WRHA funded Community Health Agencies (CHA) are out of scope of this guideline, it is recommended this process be adopted by any CHA on the shared instance of the Community Electronic Medical Record. Any Physician working within a CHA is subject to a chart review by the CPSM and as such, this standardized process will ensure efforts in identifying patients, coordinating CPSM auditor access and completing chart reviews align with that of the WRHA.

**Questions regarding this or any other Primary Care Operating Guideline should be directed to Primary Care Service Area Leadership*