Instilling public confidence in veterinary regulation.

peer review of
MEDICAL RECORDS

Participant Information Package

March 2019

CVO
THE COLLEGE OF VETERINARIANS OF ONTARIO

Instilling public confidence in veterinary regulation.
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Peer Review of Medical Records
Since 1999, Peer Review of Medical Records (PRMR) has been supporting veterinarians in meeting the standards for medical record keeping. Trained peer reviewers, who are practicing veterinarians, assess medical records of practices (facilities) that are randomly selected to participate in a Peer Review of Medical Records process. Each review results in a report that is provided to the practice with feedback on areas of record-keeping that are meeting the standards and areas where gaps in record-keeping are identified. A practice is encouraged to share the feedback with their veterinary team and adjust their record-keeping as suggested. Each veterinarian is responsible for ensuring that quality medical records exist in relationship to their own individual practice.

In analyzing data over time, the College has identified medical record-keeping as a risk in practice through the information that is gathered from its various programs, including PRMR, facility inspections, and complaints and discipline. As a result, opportunities were identified to strengthen the PRMR process and outcomes. The goal of course remains the same, improving the quality of medical records among veterinary practices in Ontario.

Changes to PRMR
Previously, practices that were due for renewal of their Certificate of Accreditation were eligible for random selection for PRMR. Now, all accredited veterinary practices operating in Ontario are eligible for random selection unless they meet specific exclusion criteria (see the criteria in the section “Selection”). Approximately 5% of practices will be selected each year.

Previously, PRMR reports provided recommendations and commendations on record keeping as a learning tool for practices and the process did not include re-assessment. Now, PRMR reports will also indicate whether a practice is successful or not in meeting the standards for record keeping. As a result, practices that are not successful will undergo re-evaluation of their medical records after taking corrective actions.

The updated PRMR process was launched in March 2019. Selected practices will have 30 days to submit medical records for peer review. Participation in the PRMR process is mandatory under Section 50 of Ontario Regulation 1093. Practices will submit medical records that demonstrate the record-keeping of all veterinarians in the practice.
Participation in Peer Review of Medical Records

The College places a strong emphasis on supporting high quality medical records in its Quality Practice Program. Medical records are central to safe quality medicine and provide the basis for the continuity of veterinary care. Peer Review of Medical Records supports veterinarians in meeting the standards for medical record keeping that ensure optimal veterinary care can be continued.

As a component of the College’s Quality Assurance Program, a PRMR provides a standardized peer review of your medical records based on requirements set out in professional practice standards and regulations, and constructive feedback on those areas that may benefit from attention or improvement. This information package explains the process and answers some frequently asked questions about peer review.

Selection

Under Section 50 (1) (c) and (d) of Ontario Regulation 1093\(^1\) practices selected by the College are required to participate in a review of their medical records. Veterinary practices chosen for a Peer Review of Medical Records are identified through a random selection process. Approximately 5% of practices are randomly selected to participate in a Peer Review of Medical Records per year. All accredited veterinary practices are eligible for random selection, with the following exceptions:

- Practices within five years after successfully completing a PRMR Assessment.
- Practices within their first two years of operation.
- Practices within one year after the renewal of their Certificate of Accreditation*.
- Practices with current limitations, terms, or conditions on their Certificate of Accreditation related to medical record keeping.

A practice may also choose to be proactive and volunteer to participate in PRMR. If successful, the practice would be exempted from random selection for a 5-year period.

*Where a practice is selected and has multiple facilities associated with it, and one or some of those facilities are within one year after the renewal of their Certificate of Accreditation, these will be assessed for eligibility on a case by case basis.

Benefits of Participation

Through feedback from trained peer reviewers, participants gain valuable insights into their record keeping processes. After considering the comments from reviewers, veterinarians have made improvements to their record keeping that result in more efficient use of time for all team members, better staff and client communication, and increased capacity to ensure the continuity of care provided to patients.

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\(^1\) 50. (1) The Registrar shall cause, and the members shall permit, the inspection of facilities and of the records kept by members in connection with the practice of veterinary medicine, in order to determine if,

(c) the records in respect of the practice of veterinary medicine are being kept as required; and

(d) the veterinary medicine being practised is generally in accordance with the standards of practice of the profession.
Process
Once your records package is received by the College, a trained Peer Reviewer will be assigned to complete the review. The records are reviewed against a standardized set of records requirements, using a check-list approach. The Peer Reviewer also makes constructive comments and provides a summary with overall recommendations. The completed PRMR Assessment Report will be sent to you. The report will include a Total Score which will indicate whether the practice was successful or not in the assessment. If the practice is not successful, directions will be provided to the practice about the next steps, including corrective actions and re-evaluation of records. For more information, please review Step 5: Review the PRMR Assessment Report and the FAQs section.

Further information including the PRMR Assessment Questions and copies of required forms is available on the College website at www.cvo.org/medicalrecordkeeping.

Peer Reviewers
Peer Reviewers are licensed veterinarians that have participated in an interview process, been approved by the Quality Assurance Committee to serve in this leadership role, and participated in a rigorous training process. Their leadership and commitment to quality practice in the profession is appreciated.

Dr. William Armstrong  Dr. Susan Kilborn  Dr. Uvisthra Singh
Dr. Donna Chui  Dr. Karen O’Keefe  Dr. Natalie Trisch
Dr. Claire Duder  Dr. Suzi Peters
Dr. Laura Frost  Dr. W. Lyle Pollock
Timeline
The following timeline provides an overview of the steps involved in the Peer Review of Medical Records process.

Day 1
**PARTICIPANT**
Letter and Information Package received from the College

Week 1

Week 2

Week 3

Week 4
**PARTICIPANT**
Submit your Practice Questionnaire and eight (8) medical records to the College within 30 days of receipt of the Letter from the College

**COLLEGE STAFF**
A Peer Reviewer will be matched with your practice to conduct the PRMR assessment

Weeks 4-5

Week 5

Week 6
**PEER REVIEWER**
Your Peer Reviewer will submit a PRMR Assessment Report to the College

Weeks 6-7

Week 7

Week 8
**COLLEGE STAFF**
You will receive your PRMR Assessment Report and directions for next steps

Week 8
Preparing for Your Peer Review of Medical Records

Upon receipt of the notification letter that indicates your practice has been selected, you will have **30 days to submit your PRMR Practice Questionnaire and medical records** to the College for review.

A Peer Reviewer will be matched with your practice to conduct the assessment. The Peer Reviewer will assess your medical records using the PRMR Assessment Questions and will complete the PRMR Assessment Report. This process generally takes **2 weeks**.

The report is submitted to the College and College staff sends the report to the practice. The turnaround time for this step is approximately **1 week**.

In total, the complete process from notification of selection to receiving the final PRMR Assessment Report will take approximately **7-8 weeks**.

The following checklist will assist you in preparing for your Peer Review of Medical Records. Each of these steps is described in detail on the pages that follow.

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<thead>
<tr>
<th>Steps in the Peer Review of Medical Records Process</th>
<th>Participant Checklist</th>
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<tbody>
<tr>
<td>1. Complete the Practice Questionnaire</td>
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<tr>
<td>2. Select 8 Complete Medical Records for Submission</td>
<td>□</td>
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<tr>
<td>3. Assemble Your Records Package for Submission</td>
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<tr>
<td>4. Complete a Case Cover Sheet for Each Case</td>
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<tr>
<td>5. Submit Your Practice Questionnaire and Records Package to the College</td>
<td>□</td>
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<tr>
<td>6. Review Your PRMR Assessment Report</td>
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Steps in the Peer Review of Medical Records Process

Step 1: Complete the Practice Questionnaire
Before a Peer Reviewer is assigned to conduct a Peer Review of Medical Records, staff needs to know what your practice looks like (patient types, staff roles, etc.). We ask that you complete a Practice Questionnaire so that an appropriate reviewer can be matched to your practice. This questionnaire also provides an opportunity to identify learning objectives associated with the records review.

a) Download the Practice Questionnaire on the College website.

- Practice Questionnaire: [https://cvo.org/getmedia/9080975f-7714-4e73-a089-49a244954448/PRMRPracticeQuestionnaire2019.pdf.aspx](https://cvo.org/getmedia/9080975f-7714-4e73-a089-49a244954448/PRMRPracticeQuestionnaire2019.pdf.aspx)

Step 2: Select Eight (8) Medical Records for Submission
In order to provide a representative sample of your practice’s medical records, complete copies of medical records for eight (8) recent cases are submitted. Please select cases within the past two (2) years that are representative of your current medical record keeping practices. In a multi-veterinarian practice, the eight cases must include records from each veterinarian working at the practice, inclusive of owners, associates, and locum veterinarians. One approach to this is to choose cases where more than one veterinarian was involved and significantly contributed to documentation in the medical record. (Depending on the number of veterinarians working at the practice, you may be asked to submit more than eight medical records).

The selected records should include two of each of the following case types:

- **Acute Medical, Chronic Medical, Surgical, Wellness or Herd Health**

Step 3: Assemble Your Records Package
For each case please include a copy of the medical record and copies of relevant components.

The following is a general guideline for what information to include in each case type:

- **Acute Medical**: include records from first diagnosis until resolution, as applicable
- **Chronic Medical**: please choose a record where the diagnosis was made in the last two years and there are at least two follow-up assessments from first diagnosis
- **Surgical**: include the pre-surgical assessment visit, the surgery, and the post-surgical assessment visit, as applicable
- **Wellness or Herd Health**: include records that are applicable for that wellness/routine visit; if puppy or kitten wellness visits, then can include the whole vaccine series

For a mixed practice, please include cases from each species type (e.g. one of each case type for Companion Animal and one of each case type for Food Producing Animal).

If your practice does not have a particular case type (e.g. no surgical cases for a mobile practice), please substitute a different case type.
For computerized records, please ensure that you send all screen views and compile them in the proper order. You may submit the records to the College electronically through the CVO Cloud Drive. Please see Step 5 below for more information on submitting records electronically.

For radiographs, provide digital copies by electronic submission or on a CD or USB if possible; do not send original radiographs. If your practice does not have digital radiographs, please submit digital photos taken of the original radiographs. All CDs and USB drives submitted will be returned with the final assessment report.

For any information related to a particular case that is contained in a log (radiographic, surgery, anesthetic, controlled drug), please provide copies of the log pages that contain the information related to that case.

In order to assist the Peer Reviewer with providing a complete report, it is helpful to include all relevant components of the record for each case. The list below is provided to assist you with compiling a complete submission. **If a component is not submitted, it will be assessed as deficient unless it is not applicable to the case.**

All cases should include the following components:

- ✓ Client/Patient Identification
- ✓ Emergency Contact Information
- ✓ History, PE findings
- ✓ Record of Vaccinations
- ✓ Assessment: problem list and differential diagnoses/final diagnosis
- ✓ Treatment Plan
- ✓ Medical treatments including any drugs administered, prescribed or dispensed
- ✓ Fees and charges (e.g., estimates, invoices)
- ✓ Client Communications (e.g., discharge instructions, home care templates, discussion notes)
- ✓ Laboratory Reports/test results, if applicable
- ✓ Audit Trail for electronic medical records

In addition to the above components, each case type should also include the following components:

<table>
<thead>
<tr>
<th>Acute Medical</th>
<th>✓ Monitoring notes for hospitalization (e.g., in-hospital treatment flow sheet) if applicable</th>
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<tbody>
<tr>
<td></td>
<td>✓ Consent Forms if applicable</td>
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<td></td>
<td>✓ Referral Letters if applicable</td>
</tr>
<tr>
<td></td>
<td>✓ Controlled drug logs if applicable</td>
</tr>
<tr>
<td></td>
<td>✓ Radiology logs if applicable</td>
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<tr>
<td></td>
<td>✓ Insurance forms if applicable</td>
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</tbody>
</table>

2 Regulatory amendments require that software used in keeping medical records provides an audit trail. The audit trail records the date and time of each entry of information for each animal, indicates any changes in the recorded information, preserves the original content of the recorded information when changed or updated, and is capable of being printed separately from the recorded information of each animal. You may need to check with your software vendor to confirm the necessary information is being recorded appropriately.
Step 4: Complete a Case Cover Sheet for Each Case

a) Download the Case Cover Sheet on the College website and complete one for each of the eight selected cases. If you are submitting a hard copy of the records package to the College, please include a hard copy Case Cover Sheet for each case.

- Case Cover Sheet: [http://www.cvo.org/PRMRCaseCoverSheet](http://www.cvo.org/PRMRCaseCoverSheet)

Step 5: Submit Your Records Package to the College
Submit your records package to the College. The records package includes:
  * Practice Questionnaire
  * Complete Copies of 8 Medical Records
  * 8 Case Cover Sheets (one for each case)

Submissions are required within thirty (30) days of notification of selection and can be made in hard copy or electronically. Please select one of the following submission methods:
Once received, your records package will be assigned to a Peer Reviewer. Our aim is to complete the review and report within eight (8) weeks.

**Step 6: Review your PRMR Assessment Report**

You will be provided with a copy of the PRMR Assessment Report, a guide to interpreting the report, and a cover letter outlining any corrective actions for your practice. The report will provide your practice with information on the record requirements that are being met and those that are not. Constructive feedback will be provided, and a Total Score given for the assessment. The Total Score will determine whether a practice is deemed successful or not in meeting record requirements. If not successful, information on taking corrective actions to prepare for re-evaluation of your records will be provided in the cover letter.

**Total Score**

The Total Score of the assessment report determines whether a practice will need to take corrective actions and undergo re-evaluation of records. Using predetermined cut-off scores, the Total Score is colour coded. If it is green, this indicates that, compared to other practices, this practice is deemed successful in meeting medical record requirements. Yellow indicates that the practice is deemed partially successful. And red indicates that the practice is deemed not successful in meeting the requirements.

A practice deemed not successful is required to take corrective actions and undergo re-evaluation. A practice deemed partially successful is advised to take self-directed corrective actions to improve record keeping to prepare for re-evaluation. A successful practice will receive feedback on strengths and gaps in record-keeping and suggestions for improvement.

**Annual Risk Issue: Written Prescriptions**

As part of the Annual Cycle for PRMR, each year a strategic risk issue will be identified to be included in PRMR Assessments for one year. At the end of the year, an aggregate report with general findings from PRMR Assessment data on the risk issue will be shared with the profession. Requirements for preparing a prescription was identified as the first annual risk issue to be assessed through PRMR in 2019. The score in this section does not contribute to the Total Score.
Frequently Asked Questions

If my practice is randomly selected for PRMR, do I need permission from my clients to submit their records to the College?

No, the College is permitted by law to review medical records kept by members to determine if they meet requirements. The College has strict privacy and security guidelines in place to protect confidential information.

If the PRMR Assessment Report scores my practice as not successful, what happens next?

In the package with your PRMR Assessment Report, you will be provided with information on next steps which will include taking actions that will improve record-keeping in your practice. The Registrar will invite you to enter into a voluntary Mutual Acknowledgement and Undertaking. Your practice will undergo re-evaluation of medical records in 6 months. If the second assessment is not successful, it will be brought to the Registrar for review. If successful, your practice will undergo re-evaluation of records the following year.

How do I find resources on medical record requirements?

The College website has a number of helpful resources to help you understand medical record requirements including a Professional Practice Standard and Guide on Medical Records, Learning Modules on Medical Record Keeping, and Sample Templates for record-keeping. These resources can be found at [link].

How do I find out what will be assessed in the medical record review?

The PRMR Assessment Questions are available on the College’s website. For each medical record submitted the Peer Reviewer will use the assessment questions to determine if each record component is present or not. In some cases, certain record components may not be applicable. For example, if the case being reviewed did not involve surgery, all assessment questions related to surgery would be noted by the reviewer as not applicable, or N/A.

Can the results of the PRMR Assessment for my practice be available on the Public Register?

No, the PRMR Assessment Report is confidential and results will not be made public on the Public Register.

Can the results of the PRMR Assessment for my practice be shared with College Committees?

In rare circumstances, where a practice that was not successful remains unsuccessful in the subsequent re-evaluation of their records, the results of the assessment may be shared with the
Executive Committee. Otherwise, information gathered from Reports will only be shared in aggregate form.

**How are the Peer Reviewers selected and trained?**
Peer Reviewers apply and are selected based on the information they submit as well as an interview. Once selected, a Peer Reviewer undergoes a rigorous training process. Following that they must complete a Peer Review of Medical Records Assessment of their own records before starting to be active as a Peer Reviewer. They participate in ongoing training.

**How is conflict of interest addressed in the Peer Review of Medical Records?**
Each practice is provided with a list of Peer Reviewers and asked to indicate if there is a conflict of interest with anyone on the list. Questions to guide this decision are:
- Have you had a working or personal relationship with this individual in the past (e.g. an acquaintance, a close friend, a competitor)?
- How close were your interactions?
- How long ago was this relationship?
- Could you or the facility in which you work reasonably be viewed as a competitor to the licensed member/Reviewer (e.g., for patients, clients, referral sources, etc.)?

**How is the Peer Reviewer chosen for the Peer Review of Medical Records for my practice?**
There is an effort to match a practice with a Peer Reviewer who has similar experience. When this is not possible, the Peer Reviewer is made aware of the circumstances relevant to your scope of practice.

**Is there a cost to me to participate in the Peer Review of Medical Records?**
No. There is no cost to participate in the Peer Review of Medical Records.

**Can I volunteer to participate in a Peer Review of Medical Records?**
Yes, you can volunteer to participate in a Peer Review of Medical Records either as a practice or as an individual veterinarian. If you are volunteering as a practice and your practice is deemed successful in your Peer Review of Medical Records Assessment, your practice will be exempt from the pool for random selection for a 5-year period. If you are volunteering as an individual veterinarian and working in a multi-veterinarian practice, and your assessment is deemed successful, it will not affect the eligibility of the practice for random selection.

**Can I share the results of the PRMR Assessment Report with staff?**
Yes. Sharing with the other veterinarians in a multi-veterinarian practice whose records were reviewed provides a professional development opportunity to improve record-keeping practices and provides an opportunity to acknowledge what is being done well. Sharing with non-veterinarian staff members involved in entering medical record information provides similar benefits. Medical record-keeping is often a team effort.

**If your question wasn’t answered here, please contact:**
The Quality Practice Team
*qualityassurance@cvo.org* or (519) 824-5600/1-800-424-2856 ext. 2222