

## **OntarioMD Submission to the College of Physicians and Surgeons of Ontario: Preliminary Consultation – Medical Records Policy**

OntarioMD appreciates the opportunity to participate in the College of Physicians and Surgeons of Ontario (CPSO)'s pre-consultation on the planned update to their Medical Records policy. Medical records encompass both digital and paper forms, but now practices with EMRs far outnumber those without. For this reason, we anticipate one purpose of the refresh is to bring the policy in line with the current digital health context (for example, the special section **Electronic Records** seems out of place, as EMRs now represent the rule rather than the exception). We look forward to providing more detailed comments in the consultation on the updated policy; at this stage, we offer brief suggestions based on our expertise in the sector. We are of course happy to meet with the CPSO to continue this discussion.

### 'Legibility' and data quality (under **Overview and Organization of Medical Records**)

While in the past 'legibility' of a clinician's encounter notes in a patient's record would be a significant issue for continuity of care, in a context where the majority of physicians retain patient information electronically, a more relevant concern is data quality. As we know from our EMR Practice Enhancement Program (EPEP), terminology and abbreviations are not always entered consistently in the patient record. Achieving nomenclature consistency makes a tremendous difference in a practice's ability to run queries on their roster and target sub-populations (for example, to issue reminders for screening, or to identify for self-management supports in chronic disease). OntarioMD supports physicians to optimize the quality of data in their EMRs through EPEP, which deploys field consultants to run data quality reviews and provide actionable tasks for improvement.

### Protection of PHI (under **Security & Storage**)

The current CPSO policy rightly refers to privacy legislation which, since the CPSO policy was written, has been updated and takes into account that patient health information (PHI) is now primarily held in digital form. OntarioMD's expertise in digital health and clinician workflow tells us that additional considerations may need to be accommodated with regard to physician responsibility in data governance.

In the current CPSO policy, physicians assume the burden of responsibility for confirming their patients' PHI is protected. It is perhaps more accurate to recognize that this burden is shared by physicians and the provincial infrastructure for digital health, as vendor specifications (set by eHealth Ontario and delivered by OntarioMD) provide assurances of EMR integrity in which physicians place their trust. OntarioMD is also responsible for connectivity solutions – notably Health Report Manager (HRM) – which provide secure transfer of reports to EMRs. In addition, reporting requirements in the context of health system transformation (stemming from the Patients First Act) has additional implications for privacy, as clinicians need to have the ability to provide de-identified, aggregated information about their roster to the Ministry via LHINs.

### Discharge summaries (under **Procedural Medicine**)

Since the time this policy was drafted, OntarioMD's product Health Report Manager (HRM) was launched and has achieved substantial penetrance across the province (7600 clinicians, 187 sending sites, 18 million reports sent). Where sending facilities and practices are live on HRM, practices receive summaries in a more efficient

and timely manner than they previously had. Given its significance as a mode of transmission, some mention should be made to its impact on discharge summary inclusion in the medical record.

Reference to the work of OntarioMD (**Appendix – Vendor Selection – reference p. 5**)

As OntarioMD's online resources related to vendor selection have been updated and, in some cases changed names, we suggest that our main site (ontariomd.ca) be referenced. In addition, as our focus has broadened considerably since this policy was drafted, we suggest references to OntarioMD's role should be modernized to reflect our current suite of EMR-associated products and services that support EMR users (delivery of specifications, Health Report Manager, OLIS connectivity, EMR Practice Enhancement Program, Peer Leader Program, etc.)