

Quality Assurance Program

– Peer and Practice Review Guide –

Step 2: In-Person Interview

CONTENTS

PPR Step 2: In-Person Interview.....	3
Clinical Records Review	3
The Behaviour-Based Interview – Parts 1 and 2	4
Location	4
Deadlines	4
Confidentiality	4
QA and the Workplace	5
QA and the Public Register	5
Personal Health Information of Clients	5
Disclosing Information to Other CRPO Committees.....	5
Preparing for Your In-Person Interview	5
Arranging the In-Person Interview and Declaring Conflict of Interest.....	6
Arranging a suitable interview space	6
Preparation Checklist.....	7
Selecting clinical records	8
Responding to Interview Questions	8
Resources to Help You Prepare	9
Peer and Practice Review Results and Possible Outcomes.....	9
our Interview Results	9
Written Submission	9
Outcomes.....	9
Frequently Asked Questions	10
Appendix A - QA Portal Instructions	11
Accessing the Portal	11
Using the QA Portal’s E-mail System	11
Completing the Prequestionnaire	12
Providing your Scheduling Information	13
Viewing your PPR Results	13
Making a Written Submission (Optional)	13
Providing Feedback (Optional)	13
Appendix B – Access to Client Information and Records.....	15

INTRODUCTION

As you are aware, you have been selected to participate in the Peer and Practice Review (PPR) as part of the College of Registered Psychotherapists of Ontario's (CRPO) Quality Assurance (QA) Program. The PPR is designed to assess your knowledge, skill and judgement, helping you to identify areas of strength and areas of practice improvement. Engaging in a peer-led review of professional practice is a routine part of being a member of a regulated health profession.

Conducted by trained peer assessors, the PPR is a two-step process that is intended to be supportive and educational. As you have already completed the first step, you will recall that you engaged in a Remote Interview and submitted advertising and possibly other materials for review. Now, in step two, you will engage in an In-Person Interview, which is a more in-depth discussion about your practice that will involve a review of records relating to the care of clients.

Did you know?

The peer and practice assessment component of a college's quality assurance program is one of the ways a college assures the public that its members are maintaining the level of knowledge, skill and judgment necessary to practice the profession.

The *Regulated Health Professions Act, 1991* (RHPA) requires that:

- all health regulatory colleges implement a peer and practice assessment;
- members cooperate by communicating with assessors and engaging in the assessment; and
- employers allow access to the practice setting and client clinical records.

PPR STEP 2: IN-PERSON INTERVIEW

The In-Person Interview consists of a behaviour-based interview and review of your clinical records. Because this interview delves into deeper discussions about your practice, you and the peer assessor have an opportunity to collaborate to explore the practice areas in which you excel and other areas that would benefit from improvement.

The In-Person Interview will last about three to four hours and will unfold in three stages:

1. Clinical Records Review
2. Behaviour-Based Interview Part 1 – case-based questions
3. Behaviour-Based Interview Part 2 – situation-based question

CLINICAL RECORDS REVIEW

The clinical records review is the first step in the In-Person Interview. Together, you and the assessor will look at your clinical records to see where your record-keeping practices are meeting the Professional Practice Standards and where they may benefit from improvement.

Maintaining accurate clinical records that meet CRPO's Professional Practice Standards is important because:

- Well-maintained records support therapists' accurate recall of clients' therapeutic processes.
- Where contextually appropriate, clinical records facilitate continuity of care by communicating the therapeutic plan, identifying what steps or actions were taken (and by whom), and what actions are required next. Such contexts might include a multi-service clinic or even situations where a therapist is required to set in motion their contingency plan as a result of unexpected illness or injury.
- Clinical records are formal documents that demonstrate professional accountability, which may be requested in a legal proceeding.

In advance of the In-Person Interview, you are asked to select and prepare 10 client clinical records. During the In-Person Interview, you must ensure these are available for review by the peer assessor whether in paper or electronic format. The peer assessor will select five records to review from the 10 provided.

Did you know?

CRPO is serious about protecting your clients' privacy. Peer assessors are beholden to strict confidentiality requirements and protocols, and may be subject to fines and professional misconduct processes in the event confidentiality is breached.

You are welcome to anonymize client clinical records, removing any information that would identify the client, including the client's name and contact information.

If you choose to anonymize any clinical records, be sure that the client's file is identifiable to you, for example through the use of a unique identifier or file coding system, and that each page in the file carries the identifier.

THE BEHAVIOUR-BASED INTERVIEW – PARTS 1 AND 2

The Behaviour-Based Interview makes up stages two and three of the In-Person Interview process.

In the second stage, the peer assessor will select one record from the five clinical records that were reviewed and will ask you a series of questions designed to explore your clinical reasoning. In this discussion, the peer assessor will focus on clinical decision-making; for example, exploring what motivated certain clinical decisions or courses of action (including inaction). No aspect of the assessment focuses on specific theoretical orientation, techniques or clinical skills.

The final stage of the In-Person Interview is quite similar to what you experienced in the Remote Interview – you will be asked to reflect on a specific situation that recently occurred in your practice and to engage in a guided discussion about that situation with the peer assessor.

LOCATION

The three stages of the In-Person Interview are conducted face-to-face, in a three to four hour visit. Prior to the interview date, ensure that a suitable meeting place is available. The setting must be private, quiet and relatively free of interruption. If you work in an agency, hospital or rented office space in a building that is generally accessible to the public, the interview can be conducted in your usual practice setting. If your practice operates from an office located in a private dwelling, such as your place of residence, then an alternate location must be arranged. More details about appropriate alternate locations follow below.

DEADLINES

Within 30 days of the date recorded on the notification, you must have confirmed a time, date and location of the assessment. The In-Person Interview must be completed within 90 days of the date recorded on the notification.

CONFIDENTIALITY

Information you share as a result of your participation in the PPR is confidential and, with limited exceptions which are described below, the information you provide can only be used for QA purposes. With this in mind, you are encouraged to provide fulsome responses that are an accurate reflection of your current level of knowledge, skill and judgment.

QA AND THE WORKPLACE

CRPO does not inform your employer, coworkers, supervisors or clients about any aspect of your participation in the QA Program. If, and how, you disclose this information is up to you. However, because you may be required to schedule time off for your PPR interview(s) and because you may need to make arrangements so that the peer assessor can access clinical records, it may be necessary for you to communicate with your employer or the person responsible for maintaining clinical records in order to facilitate the PPR process.

If your employer, or the person responsible for maintaining clinical records (also known as the health information custodian), has questions about peer assessor and/or CRPO access to the clinical records or a client's personal health information, it may be helpful to provide them with the letter in Appendix B, *Access to Client Information and Records*. This letter explains the legislative authority under which health regulators operate, answers frequently asked questions and provides contact information.

QA AND THE PUBLIC REGISTER

Information about your participation in the QA Program is not displayed on the Public Register.

PERSONAL HEALTH INFORMATION OF CLIENTS

CRPO recognizes the importance of maintaining strict confidentiality and privacy of the personal health information of clients. Moreover, CRPO understands that inappropriate disclosure is an egregious breach of trust that can damage the therapeutic relationship. To protect the personal health information of clients, CRPO takes the following precautions, among others:

- Only collects information that is relevant to the assessment taking place, and does not collect unnecessary information.
- Requests that members take reasonable measures to anonymize client information.
- Anonymizes information shared with the Quality Assurance Committee.
- Holds all peer assessors accountable to confidentiality and privacy agreements. Peer assessors are subject to monetary fines and professional misconduct processes if a breach occurs, as outlined in the RHPA.

You do not require client consent to allow the peer assessor or CRPO to review records related to client care. The *Personal Health Information Protection Act* (PHIPA) and the RHPA authorize disclosure of personal health information without a client's consent as long as the disclosure is for Quality Assurance purposes.

DISCLOSING INFORMATION TO OTHER CRPO COMMITTEES

If the QA Committee believes that a member may have committed a serious act of professional misconduct, or may be incompetent or incapacitated, the Committee may disclose only the member's name and the allegation against the member to the Inquiries, Complaints and Reports Committee (ICRC). The ICRC may carry out an independent investigation, if it elects to do so. However, in cases where a member knowingly gave false information to the QA Committee or a peer assessor, the Committee may disclose this information to the Committee that is dealing with the matter.

PREPARING FOR YOUR IN-PERSON INTERVIEW

Preparing for the In-Person Interview requires you to complete certain actions within the deadlines described above. Follow the steps included in the checklist below. You may find it helpful to print a copy of the checklist for easy reference.

ARRANGING THE IN-PERSON INTERVIEW AND DECLARING CONFLICT OF INTEREST

To communicate with the peer assessor to arrange the In-Person Interview date and time and to declare any conflict of interest, access the QA Portal at www.icomphost.com/crpo, then:

- Click on the “**Assignments**” tab.
- From your **list of assignments**, check the box beside “**In-Person Interview and Chart Review**” and click “**Select Assignment.**”
- Finally, on the “**Assignment Information**” page, fill in the relevant sections to be completed by the member.

A peer assessor different from the one who conducted the Remote Interview will be assigned to conduct the In-Person Interview. Therefore, we ask you once again to declare a conflict of interest with a peer assessor.

Once your availability and conflict of interest declaration have been reviewed, CRPO will assign a peer assessor. The peer assessor will work collaboratively with you to finalize a convenient date and time for the In-Person Interview.

ARRANGING A SUITABLE INTERVIEW SPACE

Arrange for a private and quiet location where you and the peer assessor will be able to meet uninterrupted for three to four hours. A shared office space is acceptable as long as privacy and confidentiality can be maintained. The room in which the interview will take place should include a table, two chairs and an electrical outlet.

If your practice is located in a building that is also your place of residence, it is your responsibility to arrange an alternate meeting space and to do so sufficiently in advance of the interview date. Suitable alternatives might include, for example, a private study room in a local library or church. Supply the address of the alternate meeting place to the peer assessor with sufficient lead time so that the peer assessor can make any necessary travel arrangements.

A public area, such as a coffee shop, lunchroom or cafeteria is not an appropriate meeting space. For safety reasons, an In-Person Interview can never take place in a vehicle.

Peer and Practice Review In-Person Interview

PREPARATION CHECKLIST

To prepare for your In-Person Interview, follow the steps below:

1. Read the relevant Peer and Practice Review Guide carefully.
2. Print or retain a copy of this checklist to help you track your preparation.
3. Within 30 days of the date recorded on your notification letter, access the Quality Assurance Portal to complete the following steps:
 - a. Determine if there is a conflict of interest with any of the peer assessors who may be assigned to conduct your interview.
 - b. Arrange the In-Person Interview date and time.
 - c. If necessary, arrange an alternate meeting space and ensure the address is relayed to the assessor four to seven days prior to the interview date.
 - d. Prepare 10 client files, including any invoices and receipts issued.
4. Participate in In-Person Interview, bringing along 10 pre-selected client files.
5. Review a copy of the In-Person Interview Report when this is available.
6. If you wish, make a written submission which will be reviewed by the Quality Assurance Committee along with the In-Person Interview Report.
7. Review the Quality Assurance Committee's decision letter, which will explain the Report results and identify whether further action is recommended or required.

Please be advised that members are required to complete all stages of the PPR within 90 days of the date recorded on the letter of notification.

Date on letter of notification:

Date of In-Person Interview:

Other important dates (describe):

SELECTING CLINICAL RECORDS

Pre-select and bring to the interview 10 separate client clinical records. The records, which you are welcome to anonymize, may be in paper or electronic format. If you plan to provide the records in electronic format, please supply your own laptop with the records available for viewing on the laptop. The selected clinical records should meet these general guidelines:

- They should relate to clients with whom you've engaged in therapy in the past year OR since becoming a member of CRPO. Do not provide clinical records that predate your date of registration.
- If possible, please select one or two records where the client is no longer engaged in therapy and/or where services have been discontinued.
- The records must contain any receipts and/or invoices related to the care of the client, in addition to assessments, service agreements, consent forms, third-party reports, etc. that are ordinarily a part of the clinical record, in accordance with CRPO's Professional Practice Standards for Registered Psychotherapists.

You may wish to provide your employer a copy of Appendix B, Access to Clinical Records, which explains CRPO's legal right to access clinical records relating to the care of clients.

RESPONDING TO INTERVIEW QUESTIONS

During the Clinical Record Review, the peer assessor will select five of the 10 records provided by you. Together you will review the records, comparing them against the Record Keeping Checklist to see where the records meet CRPO's standards on record keeping.

When the Record Review is complete, the assessor will select one case from the five just reviewed. With this case open before you, the assessor will ask you a series of questions to explore your clinical reasoning. Here, it will be important to respond to the assessor's questions based on the specific clinical record open in front of you.

Case-based questions will address:

- client intake and safety screening
- informed consent
- assessment
- client collaboration
- therapeutic process
- discontinuing services

Once the case-based interview questions are complete, you and the assessor can set the file aside and begin the last stage of the In-Person Interview. These final interview questions will be very similar to the type of interview questions you experienced in the Remote Interview. You will be introduced to a theme, asked to think about a situation that occurred in the past related to that theme, and then you will be asked a series of probing questions that are designed to explore the actions you took in that situation.

Situation-based topics will cover:

- Managing ethical dilemmas.
- Reflecting on personal beliefs, values or personal experiences that impact therapeutic relationships.
- Managing communication barriers.

Did you know?

When you are responding to case- or situation-based questions, it is important that you identify a relevant situation that occurred in the past. The peer assessor will ask you questions and you'll be expected to respond based on your recollection of what happened at that time. Be as specific as you can, even if your answers seem quite obvious or trivial to you.

If you begin to provide overly general responses, you can expect the peer assessor to redirect the discussion to ask that your responses remain connected to a specific situation.

Here are some examples of overly general responses:

“I usually do [X] when a client presents a risk to self or others.”

“In these situations, I tend to contact my supervisor or an authority.”

RESOURCES TO HELP YOU PREPARE

While preparation is not required for the In-Person Interview, you are encouraged to visit CRPO's website at www.crpo.ca to learn more about professional self-regulation and your responsibilities as a member of a regulated profession. In particular, you may find it helpful to review the *CRPO Professional Practice Standards and the Entry-to-Practice Competency Profile for Registered Psychotherapists*.

PEER AND PRACTICE REVIEW RESULTS AND POSSIBLE OUTCOMES**YOUR INTERVIEW RESULTS**

Your results will be available on the QA Portal in the form of a Final Report, generally within 30 days from the date of your In-Person Interview.

WRITTEN SUBMISSION

Once you have reviewed your final report, you have the opportunity to provide CRPO with a written submission. The written submission may include:

- a summary of your self-identified strengths or learning needs;
- information and documentation to support any self-remediation undertaken or planned (e.g. changes made to your advertising materials, corrections in documentation, action you've taken or plan to take to address a learning need);
- details of any changes to your practice implemented as a result of feedback received during the PPR process; and
- any other information or comments that clarify results in the Final Report

OUTCOMES

Outcomes are determined by the QA Committee, which will consider the following before making any decision or recommendation:

1. Your Remote and In-Person Interview Review reports.
2. Your most recent Professional Development tool submission.
3. Any written submission you choose to provide.

The Committee's decision will be provided to you in the form of a letter and may include one or a combination of the following:

1. No recommendations or directions are provided and your PPR is considered complete with no further action required on your part.
2. A recommendation that you pursue your own learning needs.
3. A direction to participate in specified learning activities or another form of remediation. Such action is directed where the Committee identifies gaps in knowledge, skill or judgement that can be addressed in a program of remediation or directed learning.
4. On very rare occasions where the Committee identifies an immediate risk to the public, the Committee may apply a term, condition, or limitation on a member's Certificate of Registration.

FREQUENTLY ASKED QUESTIONS

Do I need to tell my employer about the interview?

You are not obligated to tell your employer about your participation in the PPR, nor are you required to share feedback or results that come out of the PPR. You may find it is necessary to communicate with your employer about the PPR process in order to facilitate access to clinical records.

Will my employer pay me for the time I spent completing the interview?

Your employer is not required to compensate you for the time you spend on your QA obligations (e.g. by providing paid time off). As a regulated health professional you are obligated to participate in the PPR process and you must ensure that you are available to participate meaningfully.

How do I request a deferral?

If you are experiencing exceptional circumstances, you may request that the interview be delayed using the PPR Deferral Request form. Requests should be made through the QA Portal e-mail system within 14 days of the date recorded on the notification letter. Please be advised that CRPO may ask you to provide documentation to support your request, such as a note from a healthcare professional.

How do I request accommodation for my special need(s)?

If you have a disability (defined according to the Human Rights Code) and require accommodation to complete any aspect of the PPR process, you must make a request to CRPO in writing. CRPO will work with you to identify appropriate accommodations. Requests should be made through the QA Portal e-mail system within 14 days of the date recorded on the notification letter.

Who are the peer assessors?

CRPO's QA Committee appoints peer assessors who have received training in conducting Peer and Practice Reviews. Peer assessors:

- are members CRPO in good standing and have current experience in their area of practice;
- undergo a rigorous selection process, including careful application vetting and a lengthy interview that evaluates training and experience;
- receive extensive training on interviewing techniques, note-taking, scoring and formulating fair, objective reports;
- are required to adhere to a strict confidentiality agreement and conflict of interest policy; and
- have been assessed themselves during the pre-test of the interview tools.

APPENDIX A - QA PORTAL INSTRUCTIONS

CRPO has implemented an online resource – the QA Portal – to help you meet the requirements of the Quality Assurance (QA) Program. For example, through the secure QA Portal you will be able to manage many aspects of your participation in the Peer and Practice Review (PPR), such as scheduling your interview(s) and providing information related to your practice.

Information on the QA Portal is confidential and access to this information is limited to designated CRPO staff and the peer assessor assigned to conduct your PPR. To learn more about the QA Program and confidentiality, please review the *Peer and Practice Review Guide*.

Through the QA Portal, you will be able to:

- Schedule your PPR interview(s), setting date, time and location.
- Communicate with QA staff and your assigned peer assessor using the QA Portal’s Mailbox feature.
- Review the results of you interview in a report.
- Provide feedback on the PPR process.

The information that follows will help you find your way around the QA Portal.

ACCESSING THE PORTAL

The QA Portal can be accessed using the link below. Only members who have been randomly selected to participate in the PPR will be able to access the QA Portal.

Portal link: www.icomphost.com/crpo

Logging Into the QA Portal

1. Enter the link above into your internet browser’s address bar.
2. Once you arrive at the QA Portal welcome page, click the “Login” button near the top of the screen, then click the “Login” tab.
3. Enter the UserID and Password provided by CRPO then click the “Login” button that appears below the Password field.

USING THE QA PORTAL’S E-MAIL SYSTEM

The QA Portal’s Mailbox is similar to other internal messaging systems you may have already used and enables you to communicate securely with a peer assessor and/or CRPO staff who are responsible for administration of the QA Program.

Use the Mailbox to send along any inquiries you may have, or to request deferral or accommodation.

If someone has sent you a message using the QA Portal Mailbox, you will receive a notification in your personal e-mail account prompting you to log into the QA Portal to view the message. For confidentiality purposes, the contents of QA Portal messages are not relayed in these notification messages.

Composing New Messages to QA Staff or Your Peer Assessor

1. While logged into the QA Portal, click the “**Portal Mailbox**” button.
2. Click the “**Portal Mail**” tab.
3. Click “**Compose A New Message**”, and follow the instructions and prompts on the page that appears. Note: To reveal instructions provided on that page, click “**Show instructions.**”

Viewing and Replying to Messages

To view sent or received messages:

1. While logged into the QA Portal, click the “**Portal Mailbox**” button, then the “**Portal Mail**” tab.
2. Select the relevant category from the **Select Mailbox list** – for example, if you wish to view a message you received, be sure to select “**Received Mail**.”
3. Check the box beside the message you wish to view.
4. Click “**View Message**.”

If you wish to reply to the message:

1. Click “**Reply**” and type your response in the provided text box.
2. When you’ve completed typing your response, click “**Send**.”

Deleting Messages

Messages are never fully deleted from the Portal Mailbox, rather, they are removed from your primary Sent/Received sections and archived in your Deleted Messages section.

1. Select the message you wish to delete by checking the box next to it.
2. Click “**Delete Message**.”

To view a deleted message:

1. From the options in the Select Mailbox list, select “Deleted Mail.”
2. Check the box beside the message you wish to view.
3. Click “View Message.”

COMPLETING THE PREQUESTIONNAIRE

In order for the Remote Interview to take place, some advanced preparation is required on your part, including submitting the Prequestionnaire.

Accessing the Prequestionnaire

1. Log into the QA Portal.
2. Click on the “Pquestionnaire” tab and follow the instructions and prompts that appear.
3. When you reach the final page, and you consider your Prequestionnaire complete, check the box beside My Prequestionnaire is complete, and then click “Save/Exit.” This action will lock your responses, so you will not be able to edit them further.

Navigation Tips

- Move to the next question by clicking “**Next Page**.”
- Where a response to a question is required, you must enter some text into the applicable field(s) before you will be able to move on to the next question.
- If you have not yet completed the Prequestionnaire and wish to return to finish it at a later time:
 1. Click “**Exit**,” which appears on the bottom of every Prequestionnaire page.
 2. Select “**I would like to continue working on my Prequestionnaire at a later date**.”
 3. Click “**Save/Exit**.”

PROVIDING YOUR SCHEDULING INFORMATION

Shortly after you receive the letter of notification to participate in an In-Person Interview you will receive a new assignment on the QA Portal system. Once you receive this assignment, the functionality that enables you to provide your scheduling information will become available.

Once CRPO has received your scheduling information, it can take five to 10 days to confirm the interview date. You may be contacted to provide alternate availability in the event a peer assessor is not available on the dates you provided.

To provide your scheduling information:

1. Log into the QA Portal.
2. Click on the “**Assignments**” tab.
3. Click “**Show Instructions**” (if the instructions are not already revealed) and follow the steps provided.

Following the prompts on the page, be sure to:

- Identify any peer assessors with whom you may have a conflict of interest.
- Identify your preferred time of day for your interview.
- Provide at least three dates where you would be available for an interview.
- Provide a number where you can reliably be reached.
- Check the “**My section is complete**” box when you have finished.
- Click “**Save**” at the bottom of the page to retain the information you entered.

VIEWING YOUR PPR RESULTS

Results will only appear on the QA Portal once they are available. Your PPR results can be reviewed on the Portal or printed. To view your PPR results on the QA Portal:

1. Log into the QA Portal.
2. Click on the “**Reports**” tab.
3. Follow the provided instructions.

MAKING A WRITTEN SUBMISSION (OPTIONAL)

Though it is not required, a member may wish to make a written submission in cases where their PPR results will be considered by the QA Committee. Written submissions usually include information that will help the QA Committee in its considerations.

If you are providing a written submission, make sure you have received and reviewed your Report results first.

1. Log into the QA Portal.
2. Click “**New Written Submission.**”
3. Click “**Show Instructions,**” if they are hidden from view, and follow the instructions provided.

PROVIDING FEEDBACK (OPTIONAL)

Once you have completed the PPR we invite you to provide feedback about your experience. To do this:

1. Log into the QA Portal.
2. Click the “**Feedback**” tab.
3. Follow the provided instructions.

4. When you reach the final page and you consider your feedback complete, check the box beside “**My feedback is complete,**” and then click “**Save/Exit.**” This action will lock your responses so you will not be able to edit them further.

NAVIGATION TIPS

- Move to the next question by clicking “**Next Page.**”
- If you have not yet completed the questionnaire and wish to return to finish it at a later time:
 1. Click “**Exit,**” which appears on the bottom of every page.
 2. Select “**I would like to continue working on this at a later date.**”
 3. Click “**Save/Exit.**”

APPENDIX B – ACCESS TO CLIENT INFORMATION AND RECORDS

Every year, the College of Registered Psychotherapists of Ontario (CRPO) selects members for participation in the Peer and Practice Review (PPR). The PPR, which promotes continuing practice improvement by providing constructive feedback to those who participate, is one component of CRPO's broader Quality Assurance (QA) Program. During the PPR, the knowledge, skill and judgment of a member is assessed to determine whether the established standards of competence and professional practice are met.

Peer assessors carry out the PPRs; they are Registered Psychotherapists (RPs) who receive training from CRPO in evidence-informed interviewing methodologies using a structured, competency-based interview. All information collected during any aspect of a member's participation in the QA Program is confidential, meaning CRPO does not share this information with employers or the public. Moreover, CRPO does not inform employers or facility operators if a member has been selected to participate in any aspect of the QA Program.

To facilitate the PPR process, each participating member is asked to have on hand 10 client records, five of which will be reviewed during the In-Person Interview. These records may be originals, electronic copies or printed copies of electronic records.

Both employers and RPs often ask whether CRPO has the authority to access client records as understandably, maintaining the confidentiality of the personal health information of clients is paramount. The Health Professions Procedural Code under the *Regulated Health Professions Act, 1991* authorizes CRPO and its peer assessors to access the premises and records relating to the care of clients for Quality Assurance purposes [ss. 82(2) and 82(3)]. This section applies despite any provision in any Act relating to confidentiality of health records [Code, ss. 82(5)]. Further, the *Personal Health Information Protection Act, 2004* [PHIPA] supports CRPO's access – PHIPA itself states that none of its provisions should interfere with the regulatory activities of the college where the activities are required by the RHPA [ss. 9(2)(e)].

CRPO protects the personal health information of clients in a variety of ways:

- CRPO only collects information that is relevant to the assessment taking place.
- CRPO requests that members take reasonable measures to anonymize client information.
- CRPO anonymizes information shared with the Quality Assurance Committee.
- All peer assessors are held accountable by confidentiality and privacy agreements, and are subject to monetary fines and professional misconduct processes if a breach occurs, as outlined in the RHPA.

When accessing records, CRPO urges members to follow the procedures and policies set out by their employer. Members who are not clear about the policies and procedures should contact their employer or their workplace's health information custodian.

If uncertainty remains about providing access to records and facilities for QA purposes, employers, facility operators and health information custodians are encouraged to contact their legal counsel, or CRPO's Quality Assurance Manager at qa@crpo.ca.

COLLEGE OF REGISTERED PSYCHOTHERAPISTS OF ONTARIO

375 University Avenue, Suite 803 Toronto, ON M5G 2J5

T: 416-479-4330 or toll-free: 1-844-712-1364 E: QA@crpo.ca F: 416-639-2168