



College of Traditional Chinese Medicine
Practitioners and Acupuncturists of Ontario

Ordre des praticiens en médecine traditionnelle
chinoise et des acupuncteurs de l'Ontario

Quality Assurance Program

Peer and Practice Assessments

Updated July 2023



INTRODUCTION

Peer and Practice Assessments (PPA) are a part of the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO) Quality Assurance Program. The Quality Assurance (QA) Program has several components. However, this handbook is dedicated to the PPA and provides an overview of the process and information about how to prepare for the PPA.

Background Information and Legislative Context

The QA Program is an important aspect of the CTCMPAO's mandate. All Colleges under the Health Professions Procedural Code (the Code), which is Schedule 2 of the *Regulated Health Professions Act, 1991 (RHPA)* must:

- develop, establish and maintain programs and standards of practice to assure the quality of practice of the profession; and
- develop, establish and maintain standards of knowledge and skill and programs to promote continuing evaluation, competence and improvements among the members.

The *RHPA* requires that every College establish a QA Committee. The *RHPA* authorizes each QA Committee to appoint assessors for the purpose of the QA Program. All CTCMPAO members are required to participate in the QA Program and to co-operate with the assessors and the QA Committee. Failing to co-operate with an assessor or the QA Committee is an act of professional misconduct.

Further information about the CTCMPAO QA Program is found in the QA Program Regulation. The QA Program Regulation specifies that the CTCMPAO's QA Program must include:

- a) continuing education or professional development designed to:
 - I. promote continuing competency and continuing quality improvement among the members;
 - II. promote interprofessional collaboration;
 - III. address changes in practice environment; and
 - IV. incorporate standards of practice, advances in technology, changes made to entry to practice competencies and other relevant issues in the discretion of the Council;
- b) self, peer and practice assessment; and
- c) a mechanism for the College to monitor members' participation in, and compliance with the quality assurance program.

The goal of the CTCMPAO QA Program is to protect the public by working in partnership with R. TCMPs and R. Acs to support and provide them with tools to demonstrate their ongoing competence.



R. TCMPs and R. Acs are members of the CTCMPAO. The registration process ensures that they have met the professional requirements of the CTCMPAO and are competent to practise. The QA Program ensures that the competencies of R. TCMPs and R. Acs are maintained by engaging in professional development and continuing education activities that relate to the practice of the profession.

Participation is Mandatory

Under section 82 of the Code, all members are required to co-operate with the QA Committee and with any assessor appointed by the Committee. In addition, under section 4 of the QA Program Regulation, every member shall participate in the QA Program. If a member does not fully participate in the QA Program, this can be considered as an act of professional misconduct. The QA Committee may refer the name of the member and the concern to the College's Inquiries, Complaints and Reports Committee (ICRC) who can then investigate the failure to participate. It is the expectation of the College that all members wholly and fully participate in the QA Program, including the PPA.

PEER AND PRACTICE ASSESSMENT PROGRAM

Member Selection

The PPA is one portion of the QA Program. Every member is not expected to complete a PPA every year. Members will undergo a PPA at different periods during their registration with the CTCMPAO. There are several ways in which a member can be selected for a PPA, for example, the QA Committee can require a member to undergo a PPA if:

- The member was randomly selected, or
- The member was selected on the basis of criteria specified by the QA Committee and published on the College's website at least three months before the member is selected on the basis of those criteria.

CTCMPAO matches the selected member with assessors who hold a certificate of registration with the same title and designation as the member. *E.g., 1) a R. TCMP may assess a R. TCMP or a R. Ac, 2) a R. Ac can only assess a R. Ac.*

Peer and Practice Assessors (assessors) are members of the College who are familiar with the standards of the profession. They are trained to identify areas of improvement and encourage members to strive for continuous quality improvement. The PPA is designed to be educational, not punitive. Remember that the QA Program helps protect the public interest by providing a space for members to engage in self-evaluation and continuous quality improvement. As such, members should view the PPA as an opportunity to demonstrate your competencies and learn where you can improve so as to provide the best possible care for your patients.



Member Action Steps

1. Review this handbook, which contains the forms the assessors will use during the assessment. The forms are for your review only. You are not required to complete them or submit them to CTCMPO.
2. Review CTCMPO's regulations, standards of practice, policies and guidelines, available on CTCMPO's [website](#).
3. Send the following items to CTCMPO **within 30 business days** of receiving notice for an assessment:
 - a. Self-Assessment Tool;
 - b. Professional Development Log;
 - c. One copy of a current patient file with names and other identifying information (e.g., contact information, insurance information, credit card details) removed; and
 - d. Blank template of an initial assessment and treatment record.
4. The QA Committee will generally assign two assessors to conduct your assessment. You will have an opportunity to disclose any potential conflicts of interest with the proposed assessors. These can include but are not limited to personal or professional relationships.

CTCMPO will forward your materials (c. and d. listed above) to your assessors. The assessors will contact you (by telephone or email) to arrange a mutually convenient time to conduct the PPA. The PPA does not have to occur during office hours.

The Peer and Practice Assessment

Plan your schedule to allow for the PPA. For example, you will be expected to find a quiet space where you can comfortably have a conversation with the assessors. The assessors will also need to examine your clinic, work areas, patient and financial records and your advertising practices.

The PPA can take up to half a day. The assessors may need to speak with you for much of this time. As such, we recommend that you do not book appointments during the time scheduled for the assessment.

Your assessors will provide you with an opportunity to review the assessment report at the conclusion of your PPA. Prepare to discuss any issue or clarify any information you may have regarding the report.



After the Peer and Practice Assessment

The assessors will forward the assessment report (along with any comments you may have provided to the assessors) to the QA Committee for review. The QA Committee will review and consider the assessment report.

If the QA Committee determines that your knowledge, skills or judgment are satisfactory, you will receive an assessment results letter outlining the decision of the QA Committee.

Deficiencies

If the QA Committee determines that your knowledge, skills or judgment are not satisfactory, the Committee will advise you of its decision in an assessment results letter and will provide you with at least 14 days to make a written submission to the Committee.

The QA Committee will review and consider any written submission. If after reviewing, the Committee is still of the opinion that your knowledge, skills or judgment are not satisfactory, the QA Committee may require you to participate in a remedial activity – including specified education, refresher or continuing education programs, courses or initiatives.

Cost of the Assessment

Random/Stratified Random Selection: There is **no** cost to members who have been selected at random or stratified random for a PPA.

Committee Ordered Assessment: Members are responsible for the cost of the PPA. As per Schedule 4 of the College's By-Laws, the fee for a committee ordered assessment is \$600.00. The fee must be paid within 30 days of receiving the assessment results letter.

College Authority to Access Patient's Records

During the PPA, assessors will ask to review patient records. You can be assured that the assessors have the authority to review patient records and you will not be breaching any duty of confidentiality by providing access. This is because the Code expressly states that members are obligated to permit the assessors to access patient records and that the *Personal Health Information and Protection Act* does not prohibit information being disclosed during this process.

Under subsections 82(2) and 82(3) of the Code, facility operators and health information custodians are required to provide access to premises and charts. This section applies despite any provision in any Act relating to confidentiality of health records [the Code, ss 82(5)].

It will be important for you to advise your employer that the PPA must be permitted to proceed.

Co-operation with Committee and Assessors



Under subsection 82. (1) of the Code:

Every member shall co-operate with the Quality Assurance Committee and with any assessor it appoints and in particular every member shall,

(a) permit the assessor to enter and inspect the premises where the member practises;

(b) permit the assessor to inspect the member's records of the care of patients;

(c) give the Committee or the assessor the information in respect of the care of patients or in respect of the member's records of the care of patients the Committee or assessor requests in the form the Committee or assessor specifies;

(d) confer with the Committee or the assessor if requested to do so by either of them; and

(e) participate in a program designed to evaluate the knowledge, skill and judgment of the member, if requested to do so by the Committee.

Further, the Code imposes a duty upon employers (or persons who control the premises) to permit the assessor to enter and allow the assessor to access the patient records.

Confidentiality of Information

Any information that you provide to the assessors and the QA Committee is considered confidential. The assessors will provide a copy of their assessment report to the QA Committee and the QA Committee will consider and discuss the assessment report and your submissions (if any). You can consider that no one else will have access to this information (but for supporting staff). This is set out in the Code. This ensures that members are comfortable to disclose areas that they wish to improve upon and reinforces the concept that the QA Program is remedial – not punitive.

All members of the QA Committee (including supporting staff) and assessors are subject to a duty of confidentiality that survives forever. The information that you provide cannot be disclosed except in the rarest of circumstances. For example:

- If you knowingly provided false or misleading information to the QA Committee or an assessor, that information can be disclosed to the Registrar who can then commence an investigation into professional misconduct
- If you failed to cooperate with an Assessor or the QA Committee, the fact of such conduct can be disclosed to the Registrar who can then commence an investigation into professional misconduct
- If the QA Committee believes that you have committed an act of professional misconduct, or are incompetent or incapacitated, they are permitted to disclose your name and its concern to the ICRC. However, they cannot provide the assessment report or other information. The ICRC will be expected to conduct its own investigation.



Questions?

Please contact CTCMPAO QA staff at (416) 238-7359 ext.3334 or by email at qa@ctcmpao.on.ca

Materials for Your Review

The following items are the resources you will need to use to prepare for your PPA:

Self-Assessment

The Self-Assessment tool has been designed to assist you in identifying what area related to the Standards of Practice you would like to learn more about and to assist you in identifying professional development activities for the upcoming year.

Professional Development (PD) Log and the Professional Development Guidelines

The Professional Development Log is a tool designed for you to document your professional development activities.

Peer and Practice Assessment Report Form

This is the checklist the assessors will use to gauge your knowledge of CTCMPAO's regulations, standards of practice, policies and guidelines. We encourage you to review the checklist and the various regulations, standards, policies and guidelines on which the checklist is derived.