Psychology/Social Work Documentation of Sensitive Information in Electronic Medical Records

Illawarra Shoalhaven Local Health District

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Aim Statement

Within six months 100% of outpatient Psychology and Social Work documentation meets best practice standards.

Background to problem worth solving

The majority of Psychology and Social Work (Psy/SW) counselling notes are integrated into the general eMR and may therefore be accessed by other treating clinicians in future episodes of care within the broader health service. Some information within these notes may be deemed by patients to be highly 'sensitive'. Professional Codes of Conduct for Psy/SW specify confidentiality and informed consent in record keeping and usage. No specific guidelines currently exist to assist staff in how best to negotiate the new world of eMR while also respecting their professional registration standards and maintaining the trust of their patients. Practices vary widely between clinicians.

Team members

Sponsor/s (Guidance Team)

- **Carolyn Cooper**, ISLHD Executive Director Operations
- **Gaye Sykes**, ISLHD Quality Advisor

Project Team

- **Peter Orr**, ISLHD Head of Social Work.
- **Judy Pickard**, Professional Head of Psychology, MH Services.
- **Dr Zoe Fitzgerald**, Unit Head, Medical Psychology Department.
- **Michelle Lovenfosse**, Unit Head, Child & Family Psychology.
- **Dr David St Quinton**, Clinical Psychologist, Drug & Alcohol.
- **Jacqueline Cope**, Coordinator Integrated Violence Abuse and Neglect Crisis Service, SLHD.

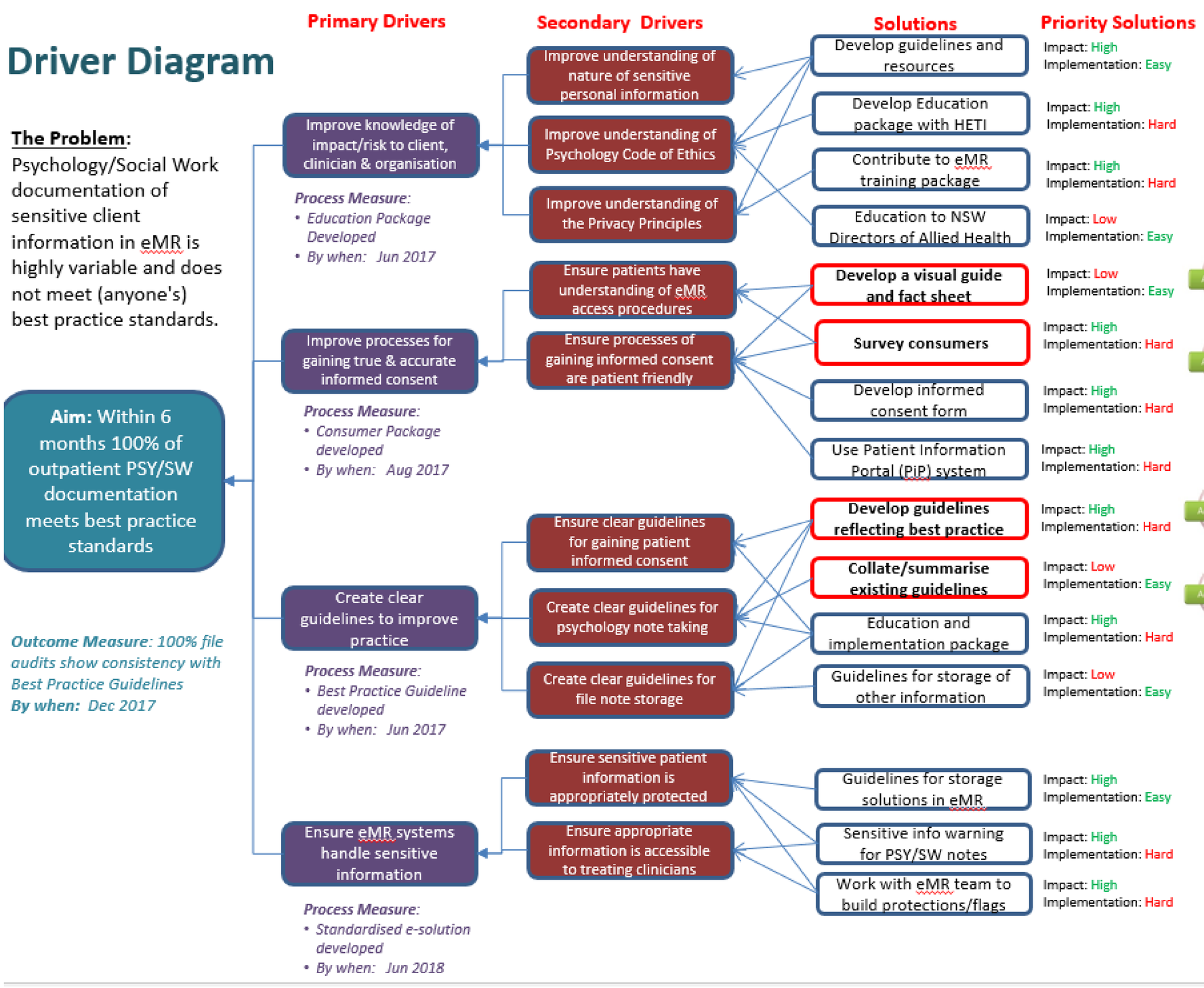
Link to National Standards

Standard 1:
Governance for Safety and Quality in Health Service Organisations
Standard 2:
Partnering With Consumers

Literature review

- Privacy Manual for Health Information (2015).
- PD2012_069 Health Care Records - Documentation and Management.
- NSQHS Standard 1 Patient Rights and Engagement.
- Psychology Board of Australia, Code of Ethics.
- Australian Psychological Society (2011). The Management of patient/client privacy and confidentiality in public provider settings.

Driver Diagram



Solution 1 - PDSA Cycle

Collate/Summarise Existing Policies

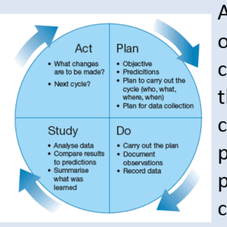
4. Act
Determine best fit in order to create practice guidelines for clinicians.
3. Study
Best practice instructions differ between NSW Health and Professional authorities.

1. Plan:
Collate, research and summarise existing policies/procedures and standards.
2. Do:
Summarise policies.

Solution 2 - PDSA Cycle

Develop Visual Guide and Facts Sheet

4. Act
Modify tool kit, integrate into Guidelines, seek consumer input.
3. Study
Current consumer understanding is not accurate.
Consumers have differing views. A sensitive topic.



1. Plan:
A tool to encourage open dialogue with consumers regarding their understanding of current eMR access processes, personal preferences and any concerns.
2. Do:
Collate data.

Solution 3 - PDSA Cycle

Develop Best Practice Guidelines

4. Act
Redraft guidelines.

3. Study
Draft guidelines prepared for distribution for expert and stakeholder feedback.

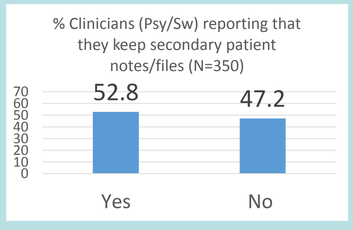
1. Plan:
Using a Delphi model, develop a set of consensus best practice guidelines .
2. Do:
Create draft guidelines for feedback.

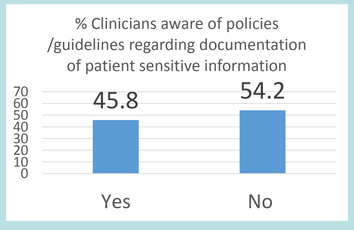
Results

- The project commenced with the ambition to raise the standards of clinical documentation in Psychology and Social Work outpatient counselling services. A particular aim was to establish and meet best practice standards for the documentation and use of sensitive patient information.
- A review of current policies, guidelines and professional standards indicated that a gap exists in providing clear best practice standards for clinicians to follow.

Clinician Practices

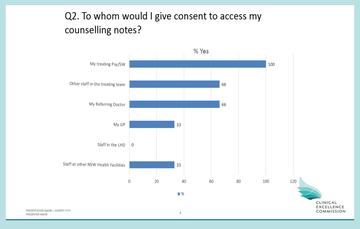
- A clinician survey indicated that current documentation practices vary broadly. Although NSW Health policy specifies a single contemporaneous medical record for documentation, 52.8% of the clinicians surveyed (Psychologists and Social Workers; N=350) reported that they use supplementary files. Reasons given included storage of working notes, case formulations, detailed histories, restricted access psychometric test materials, patient drawings and homework sheets.
- 54.2% of clinicians surveyed reported that they were unaware of any specific policies or guidelines regarding documentation of sensitive patient information in medical records.

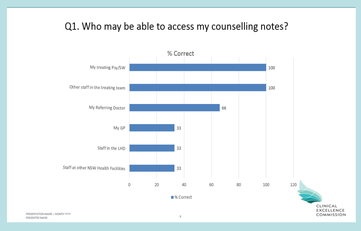




Consumer Understanding

- Consumers surveyed showed a limited understanding of current eMR processes.
- Consumer preferences did not fully align with current eMR processes.





Process measures

- Consumer Package developed – By Aug 2017
- Best Practice Guideline developed – By Jun 2017
- Education Package Developed – By Jun 2017
- Standardised e-solutions developed – By Jun 2018

Discussion

- Counselling notes can at times contain information that the patient deems as highly sensitive. It is important within NSW Health that procedures, policies and guidelines exist to assist clinicians to deal with this clinical information in the most appropriate manner, consistent with Privacy Principles and NSW Health policies, and being mindful of professional registration standards, community and patient expectations.

Overall Outcome of Project

- Collated and summarised a large amount of material from existing policies, principles and standards, bringing a better understanding of a complex topic.
- Increased awareness of the extent of variation in practices of documentation.
- Clinician input indicated a gap in guidance provided by existing policies or guidelines.
- Consumer informed consent is limited, as is current material available to fully inform consumers.
- We are well on the way to drafting some Guidelines for the documentation of sensitive information.

Plans to sustain change

- Executive Support for CPI Project Team to continue.
- Executive Support to continue with draft Guideline document.
- Engagement of other LHDs through State Psychology and Social Work senior meetings.
- Engagement of consumers.
- Engagement of eMR planners and stakeholders.

Plans to spread / share change

- MOH Chief Allied Health Officer.
- To other LHDs through Directors of Allied Health.
- Submit into Local Quality Awards.
- Present at National Professional Conferences.
- Submitted to ACI Innovation Exchange.