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Intent / Purpose

 Outline the expectations and requirements for documenting in Health Care Organization (HCO) Client health records by Post-Secondary Institution (PSI) Students and Educators during practice education experiences within HCOs.

Definitions

Refer to: Standard Terms and Abbreviations

Designation	The recognized healthcare qualification, credential level, certification, specialized training, or reserved title of the author in a health record		
	Includes regulated and reserved titles for exclusive use of registrants of regulatory colleges ¹ , titles of non- regulated healthcare providers under a provincial registry or association, and titles of clinically-related support personnel		
Document/ Documentation	"includes any written and/or electronically generated information about a client that describes the care or service provided to that client." ²		
	"includes (a) a thing on or by which information is stored, and (b) a document in electronic or similar form." ³		
Health record	"confidential compilation of pertinent facts of an individual's health history, including all past and present medical conditions, illnesses and treatments, with emphasis on the specific events affecting the patient during the current episode of care."		
Record/Recording	Noun: Any confidential information that is recorded in some way "Under FIPPA, a 'record' includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by graphic, electronic, mechanical, or other means." ⁵ Examples: email, text message, CD/DVD, USB/SD memory device, microfiche, computer file, data management systems, mobile device, camera, or "even heard by word of mouth" (i.e. subjective data).		
Scope of Practice	"the range of healthcare tasks, decisions or activities of a qualified, licensed healthcare professional (e.g. doctor, nurse practitioner, nurse, pharmacist) allowed by law and the provincial/territorial licensing authority governing that profession. A scope of practice is a general boundary and does not necessarily mean that an individual provider		
	has the knowledge, skills, or experience to safely perform all allowed activities."7		

¹ Government of British Columbia. (n.d.). *Title Protection*. Retrieved August 27, 2019 from https://www2.gov.bc.ca/gov/content/health/practitioner-professional-resources/professional-regulation/title-protection

² British Columbia College of Nursing Professionals. (2019). *Pub.* 433 Documentation. Retrieved August 27, 2019 from https://www.bccnp.ca/Standards/RN_NP/PracticeStandards/Lists/GeneralResources/RN_NP_PS_Documentation.pdf

³ Government of British Columbia. (2020). Personal Information Protection Act [SBC 2003] Chapter 63. Retrieved November 3, 2020 from https://www.bclaws.ca/civix/document/id/complete/statreg/03063_01#section1

⁴ Health Information Management. (2019). What is a Health Records? Retrieved August 27, 2019 from http://www.himconnect.ca/patients/commonly-asked-questions/what-is-a-health-record

⁵ Office of the Information & Privacy Commissioner for British Columbia. (October 2015). Guide to Access and Privacy Protection under FIPPA. Page 7. Retrieved April 5, 2019 from https://www.oipc.bc.ca/guidance-documents/1466

⁶ National Health Service. (October 2019). POL_1010 Confidentiality Policy. Corporate Information Governance. Version 5.0. Page 5. Retrieved March 21, 2021 from https://www.england.nhs.uk/publication/confidentiality-policy/

⁷ Canadian Medical Protective Association. (n.d.). *Scopes of practice*. Retrieved November 3, 2020 from https://www.cmpa-acpm.ca/serve/docs/ela/goodpracticesguide/pages/teams/Healthcare_teams/scopes_of_practice-e.html

Practice Education Guidelines

Students and on-site PSI Educators document the health care and service they provide to HCO Clients according to the following:

- HCO policies, procedures, and protocols for documentation, including only using approved abbreviations
- PSI requirements for documentation
- relevant legal, legislative, ethical, regulatory, and professional requirements

Students and on-site PSI Educators:

- Document every episode of care or service as soon as possible after an action or event has occurred (never before)^{8, 9}, at the minimum, within the completion timeframe stated within HCO policy.
- Enter any omitted, forgotten, or erroneous documentation in a timely, honest, and forthright manner.¹⁰
- Sign or initial all entries in the health record.
- Use safeguards to protect personal, confidential, and sensitive information of records, including but not limited to, protecting user identification and passwords. (see <u>PEG Privacy and Confidentiality</u>)

Students:

- Use their legal name, or name used for regulatory body registration if a second-credential program student.
- Sign with given name, surname, PSI, 'Student' designation (or visa versa), and year of study (if more than 1 year).
 - Example: Jane Doe, British Columbia University Student Nurse 3 John Doe, British Columbia College Pharmacy Technician Student
- Use only the approved abbreviations for PSI and Student designation. Example: Jane Doe, BCU SN 3 or John Doe, BCC PhT-S

On-site PSI Educators:

- Sign according to their regulatory or association requirements.
- Identify their PSI, unless acting in a dual role as employee of the HCO and faculty of the PSI.

⁸ British Columbia College of Nursing Professionals. (2019). Pub. No. 433 Documentation. Retrieved June 23, 2019 from https://www.bccnp.ca/Standards/RN_NP/PracticeStandards/Lists/GeneralResources/RN_NP_PS_Documentation.pdf
9 British Columbia College of Social Workers. (2009). Code of Ethics and Standards of Practice. Retrieved August 27, 2019 from http://www.bccollegeofsocialworkers.ca/wp-content/uploads/2016/09/BCCSW-Code-of-Ethics-Standards-of-Practice.pdf
10 British Columbia College of Nursing Professionals. (2019). Pub. No. 433 Documentation. Retrieved June 23, 2019 from https://www.bccnp.ca/Standards/RN_NP/PracticeStandards/Lists/GeneralResources/RN_NP_PS_Documentation.pdf

When a signature record or master signature list is used to identify authors of handwritten entries in a health record:

- Students enter the date, their printed name and PSI, 'Student' designation (or visa versa), signature, and initials
- Students should also include the name of the supervising PSI Educator or HCO Supervisor (might need to repeat the entry when supervised by more than one person).¹¹
- On-site PSI Educators enter the date, their printed name and PSI, designation, signature, and initials.

When documenting electronically:

- The Students' and Educators' personal user identification and password are equivalent to a legal signature.
- Students or Educators do not share user identification and/or passwords.¹²
- Students or Educators do not document using another individual's personal identification.

Only authorized Students and Educators access Client information and document in the health record (electronic- and paper-based)¹³ (see <u>PEG Privacy and Confidentiality</u>).

Unless in emergent and/or exceptional circumstances:

- No Student or Educator documents on behalf of another.
- No HCO Worker documents on behalf of a Student or PSI Educator.

If an HCO Worker must document on behalf of a Student or Educator, the HCO Worker clearly indicates that it is being done by a third party.

HCO policy identifies conditions where two sets of signatures are always required, what the co-signing indicates, and when the Student is allowed to or required to be one of the signatures.¹⁴

¹¹ Healthcare Insurance Reciprocal of Canada. (2017). Strategies for Improving Documentation. Pg. 10. Retrieved August 27, 2019 from https://www.hiroc.com/system/files/resource/files/2018-10/Documentation-Guide-2017.pdf

¹² İbid. Pg. 21.

¹³ Ibid.

¹⁴ Ibid. Pg. 10.

PSI Educators and/or HCO Supervisors countersign or co-sign Student documentation when required by HCO and/or PSI policy, professional or discipline specific practice standards, and/or Student's level of competency.

Examples of professions that require some degree of countersigning: Child Life Specialists¹⁵; Dietitians¹⁶,; Nurse Practitioners¹⁷; Occupational Therapists¹⁸; Physicians¹⁹; Physiotherapists²⁰, Respiratory Therapists²¹; Social Work²², Speech Language Pathologists²³

When a co-signature is not required:

- Students should note in their documentation the name of the HCO Worker responsible for the HCO Client's care. ²⁴
- HCO Supervisor / Worker reviews Student documentation and identifies themselves in the health record before the end of the Student's shift to indicate accountability for Client care.²⁵
- PSI Educator reviews Student documentation, and when directly observing student practice indicates this in the health record.²⁶

HCO Supervisors/Workers maintain responsibility for the overall health care of the HCO Client (see <u>PEG Supervision of Students</u>) and document this by co-signing PSI Student entries or a separate entry before the end of the Student's shift.

¹⁵ Association of Child Life Professionals. (2012). *Intern Supervisor's Manual for Child Life Clinical Internship Programs*. Pg. 144. Retrieved November 11, 2020 from https://www.childlife.org/docs/default-source/certification/internships/internshipspervisorsmanual.pdf?sfvrsn=a59fa14d_6

¹⁶ College of Dietitians of British Columbia. (2019). *Practice Guidelines – Cosigning Dietetic Students' Records*. Retrieved August 27, 2019 from https://collegeofdietitiansofbc.org/registrants/quality-assurance-program/

¹⁷ BC College of Nursing Professionals. (2020) Scope of Practice for Nurse Practitioners - Regulatory Supervision of Nurse Practitioner Student Restricted Activities. Pg. 9. Retrieved November 11, 2020 from https://www.bccnp.ca/Standards/RN_NP/NPScopePractice/scope/part2/Pages/regulatory_supervision.aspx

18 UBC Faculty of Medicine Department of Occupational Science & Occupational Therapy. (2020). MOT Student Handbook. Pg. 50. Retrieved November 11, 2020 from https://med-fom-osot.sites.olt.ubc.ca/files/2020/09/MOT-Student-Handbook-2020-2021.pdf

¹⁹ UBC Faculty of Medicine MD Undergraduate Program. (2018). *Policy & Procedures: Expectations of Medical Students in Supervised Clinical Settings* (031A). Pg. 3. Retrieved November 11, 2020 from

https://mednet.med.ubc.ca/AboutUs/PoliciesAndGuidelines2/Policies%20Guidelines/Expectations%20of%20Medical%20Students%20in%20Supervised%20Clinical%20Settings%20(031a).pdf

²⁰ College of Physical Therapists of British Columbia. (2018). Standards of Practice for Physical Therapists in British Columbia: Standard 8 Documentation and Record-Keeping. Pg. 13. Retrieved August 20, 2019 from https://cptbc.org/wp-content/uploads/2019/04/CPTBC_Standards_2018_All.pdf

²¹ College of Respiratory Therapists of Ontario. (2015). Respiratory Therapist Providing Education Professional Practice Guideline. Pg. 14.; Documentation Professional Practice Guideline. Pg. 24. Retrieved November 11, 2020 from https://www.crto.on.ca/pdf/PPG/MembersAsEducators.pdf and https://www.crto.on.ca/pdf/PPG/Documentation.pdf

²² British Columbia College of Social Workers. (2009). Code of Ethics and Standards of Practice. Pg. 16. Retrieved August 27, 2019 from http://www.bccollegeofsocialworkers.ca/wp-content/uploads/2016/09/BCCSW-Code-of-Ethics-Standards-of-Practice.pdf

 ²³ College of Speech and Hearing Health Professionals of British Columbia. (2019). CPG-04 Clinical Practice Guideline: Documentation & Records Management.
 Pg. 5. Retrieved November 3, 2020 from https://www.cshbc.ca/wp-content/uploads/2019/02/CSHBC-CPG-04-Documentation-Records-Management.pdf
 ²⁴ Healthcare Insurance Reciprocal of Canada. (2017). Strategies for Improving Documentation. Pg. 10. Retrieved August 27, 2019 from

²⁴ Healthcare Insurance Reciprocal of Canada. (2017). Strategies for Improving Documentation. Pg. 10. Retrieved August 27, https://www.hiroc.com/system/files/resource/files/2018-10/Documentation-Guide-2017.pdf

²⁵ Fraser Health Authority. (2017). *Policy 02-875: Student Practice Education*. Pg. 5. Retrieved November 11, 2020 from https://www.fraserhealth.ca/-/media/Project/FraserHealth/FraserHealth/About-Us/Accountability/Policies/StudentPracticeEduction-Policy-201705.pdf
²⁶ Ibid.

PSI Educators and/or HCO Supervisors follow-up on any identified discrepancies in Student documentation, take corrective action with Student and/or Client care or service, and document an addendum to in a timely manner.

Should it be found that a Student recorded information in the health record they know or ought to reasonably know to be false, misleading, inaccurate, or otherwise improper, it could result in the HCO (see <u>PEG Student Practice Issues</u>):

- suspending or excluding the Student, either temporarily or permanently, from the practice education experience
- taking legal action against the Student

Roles, Responsibilities and Expectations

Post-Secondary Institutions

- Ensure requirements for Student documentation align with profession or discipline specific requirements and are consistent with HCO policy.
- Communicate the requirements for documentation to Student and Educators.
- Educate Students on the principles and practices for documentation in health records (electronic- and paper-based) including privacy, confidentiality, professional practice standards, and legal requirements.
- Specify the conditions for when countersigning/co-signing of Student documentation.

Students

- Document within the limits of the Student role, and, if a second-credential student and a member of a regulated profession, within own scope of practice.
- Document according to HCO, PSI, and relevant profession or discipline specific policy and protocols, including the use of a master signature record.
- Make corrections to the health record in a timely manner and according to HCO policy.
- Use the HCO's approved method to sign or initial all documentation.
- Use only approved HCO abbreviations when documenting.
- Request PSI Educator / HCO Supervisor review of documentation as required.
- Obtain countersignature as required.
- Note the name of the HCO Worker who is responsible for the Client's care in health record documentation when co-signature is not required.

 Never share user identification or password with others or allow others to document under any other name but their own. (see <u>PEG Privacy and Confidentiality</u>)

Health Care Organizations

- Provide PSI and its Educators with access to policies, protocols, procedures, and forms for documentation.
- Provide timely access to electronic health records to allow documentation by Students and Educators in order to prevent sharing of user identification and passwords by HCO Workers.
- Ensure the systems and processes for electronic- and paper-based documentation align with the expectations for Students' and Educators' documenting and signing in health records.

PSI Educators / HCO Supervisors

- Inform HCO Workers of the level of supervision Students require and documentation expectations (see <u>PEG Supervision of Students</u>).
- Review Student documentation to confirm the documentation is accurate, complete, and done according to policy, regulatory requirements, and/or level of competency.
- Make every effort to keep the Student from being in a position where they would need to document on behalf of another.
- Follow HCO and/or PSI policy, and/or profession-specific requirements for cosigning Student documentation.
- Follow-up on incomplete documentation or identified discrepancies with the Student in a timely manner.
- Guide the Student in how to complete or correct entries.
- Depending on level of Student, document when Student practice is directly observed.
- Document addendums in a timely manner as needed. (Example: when the HCO Supervisor does not concur with the Student's assessment or plan of health care).
- Only document on behalf of Students in emergent and/or exceptional circumstances and clearly indicate the documentation is done as a third party.

- Anytime it is determined that a Student recorded information in the health record
 they know or ought to reasonably know to be false, misleading, inaccurate, or
 otherwise without taking corrective action:
 - Report the Student to the PSI Practice Education Coordinator (or designate).
 - Report the issue to the HCO manager (or delegate) and/or HCO Practice Education Coordinator.
- When co-signature is not required, ensure the HCO Worker assigned overall Client care or service indicates accountability for care or service with a separate entry before the end of the Student's shift.

References and Resources

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Guideline Review History

Version	Date	People Responsible	Brief Description (reason for change)	
1	November 2008	Authors/Editors: Carol A. Wilson (BCAHC), Barb Collingwood (BCAHC) Reviewers: Practice Education Committee of the BC Academic Health Council (Grace Mickelson, Chair)		
2	June 2012	Editors: Monica Adamack (IHA) Kelly Hughes (Langara)	Revised to align with new template and language Updated references and resources	
3	March 2021	Editor: Carol A. Wilson (PHSA) Reviewers: Judy Lee (KPU) BJ Gdanski (PHSA) Ministry of Health (Allied Health Policy Secretariat and Nursing Policy Secretariat) Ministry of Advanced Education, Skills and Training (Health Education Reference Committee) Health Authority Practice Education Committee	Definitions expanded, updated, and referenced Updated and expanded guideline Updated references and updated practice guidelines from various professions Cross referenced to other relevant PEGs Clarified aspects of documentation for paper and electronic records	