The College of Naturopaths of Ontario

Peer and Practice Assessment Handbook

Introduction

Upon registering with the College of Naturopaths of Ontario, Registrants have the authority to use the title of Naturopathic Doctor and to practise naturopathy in Ontario. This comes with important responsibilities including the ability to demonstrate an understanding of the standards of the profession, and compliance with the regulations, standards of practice, policies, and guidelines of the College. Peer and practice assessments, as a component of the College's Quality Assurance (QA) Program, play a key role in ensuring Registrants are meeting these responsibilities. With these assessments, Registrants undergo a review of their knowledge and performance with a peer assessor. Other elements of the QA Program include a self-assessment, and continuing education and professional development (ongoing education).

The Peer and Practice Assessment Program is designed to be transparent, educational, and supportive. College-trained assessors aim to provide a positive learning experience that is relevant to each Registrant's practice. During the peer and practice assessments, the assessors can engage in a dialogue with Registrants, and help them identify areas of strength and opportunities for improvement. The College recognises that the majority of Registrants are practising safely, competently, and ethically.

Each year, the College randomly selects up to 20% of General Class Registrants to participate in a peer and practice assessment. Once they go through the process, they will be exempt from selection for five years. New Registrants of the College will be exempt from the peer and practice assessment program for 3 years.

All peer and practice assessments are conducted virtually. The assessment includes a review of specific aspects of the Registrant's premises, record keeping practises, certain College standards and guidelines, their professional portfolio and an in-depth clinical discussion of one patient chart.

Here is what a Registrant can expect before, during and after their peer and practice assessment.

Before the Assessment

The College notifies the Registrant by email that they have been randomly selected for a peer and practice assessment. The notification outlines the pre-assessment information to be provided, including worksheets that the Registrant will need to complete and submit to the College.

The Registrant will also be required to submit one patient record with all identifying information redacted. A patient record includes the patient's file, and the corresponding appointment and financial records.

A Registrant selected for a peer and practice assessment may seek an extension if they are currently on parental leave, are seriously ill, are on a leave-of-absence or have other reasons or extenuating circumstances. All extension requests will be reviewed by the QA Committee on a case-by-case basis.

The Extension Request form must be received by the College within 30 days of the Registrant being notified of their selection for an assessment, unless there are extenuating circumstances that affect the Registrant's ability to submit the application within this timeframe.

Pre-assessment Information and Declaration of a Conflict of Interest

The online Pre-assessment Information and Declaration of a Conflict of Interest form includes questions related to the Registrant's practice (e.g., type of practice, controlled acts performed, etc.) and gives the Registrant the opportunity to inform the College of any circumstances that they feel demonstrate a conflict of interest with a potential assessor.

There is the possibility that a potential assessor and the Registrant selected to undergo a peer and practice assessment may have had some form of contact with one another. Minimal or collegial contact between the assessor and Registrant is acceptable and is unlikely to result in a conflict of interest.

A conflict of interest exists where a reasonable person would conclude that the assessor's professional, personal or financial relationship to the Registrant may affect their judgment or the discharge of their duties on behalf of the College. A conflict of interest may be real or perceived, actual or potential, direct or indirect. Examples of a conflict of interest could exist with personal relationships (ongoing or in the past), professional relationships (shared practices, business arrangements, etc.), and an existing relationship where one person is in a position of authority over another. Each case of a potential conflict of interest is evaluated on its own set of circumstances.

The information the Registrant provides in the Pre-assessment Information and Declaration of a Conflict of Interest form:

- provides the College with the most current information about their practice,
- assists the College in matching them with the most appropriate assessor, and
- familiarises the assessor with the assigned Registrant and their practice.

This online form will need to be completed and submitted within 14 days of receiving notification that they have been selected for a peer and practice assessment.

Peer and Practice Assessment Worksheets

In order to facilitate the discussion with the assessor, Registrants are required to complete some components of the peer and practice assessment ahead of time and submit them to the College. The completed Registrant's worksheets will be provided to the assessor prior to their peer and practice assessment. During the assessment, the assessor will go over the

Registrant's comments with them and discuss what has been done well and what areas may need improvement.

The worksheets will need to be completed and submitted to the College approximately 45 days after the Registrant receives notification of the peer and practice assessment.

Premises Review Worksheet

If the Registrant has a physical practice location, they will be required to complete the Premises Review Worksheet as it relates to their primary place of practice. They will indicate if, in their opinion, the criteria on the worksheet are met. They may provide details as to how they have met the criteria or why certain criteria have not been met.

If the Registrant does not have a physical practice location, but provides home-visits, they will need to complete the sections pertaining to infection control and equipment as it pertains to home-visits, as well as storage and maintenance of patient records.

If the Registrant only provides care via telepractice, they will need to complete the section pertaining to the storage and maintenance of patient records.

Patient Files Review Worksheet

In order to complete the Patient Files Review Worksheet, the Registrant will select five patient files (no more than a year old) that best represent the scope and breadth of their practice. If they perform IVIT procedures and/or prescribe, they will choose at least one file that includes these controlled acts.

This worksheet requires the Registrant to review each of the selected files to assess how well their record keeping practices comply with expectations set out in the Standard of Practice for Record Keeping. They will indicate if, in their opinion, the criteria have or have not been met. They may include comments to provide information explaining their responses.

Professional Portfolio Review Worksheet

The Professional Portfolio Review worksheet includes the College's requirements related to the Registrant's self-assessment, and continuing education and professional development documents. Every Registrant is required to maintain a professional portfolio and will need to indicate if, in their opinion, the criteria have or have not been met. If they are missing certain documents, they may provide information explaining the reasons why.

Standards of Practice Review Worksheet

The QA Committee may select up to 10 standards of practice, policies, regulations and/or guidelines to be reviewed as one component of the peer and practice assessment. The Standards of Practice Review Worksheet includes questions about the documents that have been chosen for the current peer and practice assessment cycle. The Registrant will be expected to read the chosen documents and complete the form, answering the questions to the best of their ability.

Chart Stimulated Recall Worksheet

The Registrant will receive a Chart Stimulated Review Worksheet, however, they are **not** to complete it prior to the peer and practice assessment. The worksheet is provided for the Registrant to review and reflect on so that they will be familiar with the topics to be discussed with the assessor during the assessment. This component of the peer and practice assessment is designed to help the Registrant recall a particular patient experience, explain the thought processes used, and demonstrate their clinical reasoning and reflection that occurred.

Non-clinical Peer and Practice Assessment

A Registrant who has a non-clinical term, condition, and limitation placed on their registration will undergo an assessment that has been modified from what a Registrant who is in clinical practice will undergo. The non-clinical assessment includes a review of the Registrant's professional portfolio and their knowledge of the College's standards of practice, policies, regulations and/or guidelines.

The intention of this assessment is to provide the Registrant with an opportunity to have a discussion with a peer to identify areas of strength in their understanding of the College's standards of practice, etc., as well as areas that could be improved. While some of the standards of practice may not directly apply to their role in the profession, it is still expected that they are fully aware of them.

The Registrant will be provided with the Professional Portfolio Worksheet (see above) and the Standards of Practice Worksheet (see above) to complete and submit to the College prior to their assessment.

Documents to be Submitted

The Registrant's notification letter will provide the deadline (approximately 45 days) to submit the following documents to the College.

Clinical peer and practice assessment:

- one complete, redacted patient record (a complete patient record includes the patient's file, appointment, and financial record), such that the record is identified only by the patient's initials,
- completed Premises Review Worksheet,
- completed Patient Files Review Worksheet,
- completed Professional Portfolio Review Worksheet, and
- completed Standards of Practice Review Worksheet.

Non-clinical peer and practice assessment:

- completed Professional Portfolio Review Worksheet, and

- completed Standards of Practice Review Worksheet.

Scheduling the Peer and Practice Assessment

Once the College has received the Registrant's Pre-assessment Information and Declaration of a Conflict of Interest form, as well as all assessors' Declaration of a Conflict of Interest forms, each Registrant will be matched to the most appropriate assessor. The Registrant will be notified by email of their assigned assessor.

The assessor will contact the Registrant to arrange the virtual peer and practice assessment for a mutually convenient day and time. It is expected that the assessment will be done within approximately six months from the time the Registrant was notified of being selected for their assessment. The Registrant will also be provided with the information needed to join the online peer and practice assessment.

Prior to the assessment, the assessor will review the worksheets submitted by the Registrant and complete the Patient Files Review Worksheet using the patient file provided.

During the Assessment

The virtual peer and practice assessment will take approximately 2-3 hours to complete.

During the assessment, the Registrant should have the following documents on hand for their discussions with the assessor:

- The chart to be discussed for the Patient Files Review and the Chart Stimulated Recall,
- Professional portfolio for the Professional Portfolio Review, and
- Drug and substances inventory log(s) (if applicable).

The Registrant is expected to be in their primary practice location at the time of the peer and practice assessment. If the assessor has questions about the Premises Review Worksheet this allows the Registrant to show the assessor their clinic and answer their questions.

The assessor will review each of the Registrant's worksheets, asking questions to clarify the information they provided, and to facilitate a discussion. They will also point out what was done well and what areas are deficient and in need of improvement. The assessor will have reviewed the patient record provided and will compare their assessment of the Registrant's record keeping practices with that of the Registrant. This patient file will also be used for the discussion related to the Chart Stimulated Recall Worksheet. The assessor may also have questions about the Registrant's record keeping practices related to their inventory records. As the Professional Portfolio Worksheet is discussed the assessor will ask to see some documents related to their self-assessment and continuing education activities.

At any time during the assessment, the Registrant should feel free to ask questions and provide information that will help the assessor determine how well they have met the criteria contained in the worksheets.

The assessor will go over their observations and provide the Registrant with an overview of what they will include in the Assessor's Report that they will submit to the College. The report will outline their observations of the Registrant's knowledge, skill, and judgment.

After the Assessment

The results of the peer and practice assessments will remain confidential and are only shared with the Registrant, Professional Practice Department staff and the QA Committee. This information is not shared with other staff at the College, other Committees, or employers.

The College will send the Registrant a copy of the Assessor's Report to be filed in their professional portfolio. The Registrant will also receive a link to the online Registrant Peer and Practice Assessment Feedback form to complete and submit to the College. The form provides the Registrant the opportunity to evaluate the peer and practice assessment process and the skills of the assessor. The Registrants feedback is entirely confidential, and their name will not be shared should they have had any negative feedback for the assessor or staff of the College. Their opinion and those of other participants will help the College better understand how it can improve the program to be more beneficial for Registrants in the future.

QA Committee's Evaluation of the Assessment

Depending on the information contained in the Assessor's Report the Registrant will receive a letter notifying them of one of the following.

1. There were no areas identified that need improvement and nothing further will be required of the Registrant regarding the peer and practice assessment.
2. There were areas identified that need minor improvement. The Registrant may receive recommendations as to how they can make improvements in these areas, however, nothing further will be required of them regarding the peer and practice assessment. Any actions taken by them to address the issues will be reviewed during their next assessment.
3. There were areas identified that require significant improvement in which case the Registrant will be invited to make a submission outlining how they intend to rectify these areas or steps they may have already taken. The submission must be received by the College within 30 days of being notified.

For those who require significant improvement, the QA Committee will consider the Assessor's Report and any other relevant information including the submission from the Registrant and determine if their knowledge, skill, and judgment is satisfactory or whether additional remediation is required. If they have demonstrated the appropriate knowledge, skill, and judgment, they will receive a letter indicating that no further action is required.

If the QA Committee is of the opinion that their knowledge, skill, and judgment remain unsatisfactory, they will be invited to provide a second written submission outlining steps that they have taken to address the remaining concerns. The Committee will review the additional submission and if they determine that the Registrant's knowledge, skill, and judgment is satisfactory as a result of changes they have made, no further action will be required.

If the Committee finds that the Registrant's knowledge, skill, and judgment continues to be unsatisfactory, Section 80.2 of the *Health Professions Procedural Code* authorizes it to do one or more of the following:

- require the Registrant to participate in continuing education or remediation programs specified by the Committee,
- direct the Chief Executive Officer to impose terms, conditions or limitations, for a specified period of time to be determined by the Committee,
- disclose the Registrant's name and allegations against them to the Inquiries, Complaints and Reports Committee if the QA Committee is of the opinion that they may have committed an act of professional misconduct or may be incompetent or incapacitated.

See the next page for a summary of the peer and practice assessment process.

Summary of a Peer and Practice Assessment

Registrant is notified by email that they have been randomly selected to participate in a peer and practice assessment and to submit the Pre-Assessment Information and Declaration of a Conflict of Interest form and the peer and practice assessment worksheets.

Registrant is notified of the assigned peer assessor and provided with the information needed to prepare for the assessment.

The assessor, trained by the College in the peer and practice assessment program, contacts the Registrant and schedules a date and time for the virtual assessment.

The assessor meets with the Registrant for approximately 2-3 hours. The assessor reviews their practice based on the stadards of practice of the profession using the peer and practice assessment worksheets that the Registrant completed and reviewed prior to the assessment.

The assessor ends the assessment reveiwing the results of the assessment and provides an overview of the report they will submit to the College.

The Assessor's Report is submitted to the College and the Registrant is invited to complete the Peer and Practice Assessment Feedback form.

The College reviews the Assessor's Report and all relevant information when determining if the Registrant's knowledge, skill, and judgment is satisfactory.

The College notifies the Registrant in writing of the Quality Assurance Committee's decision. If the Registrant has demonstrated satisfactory knowledge, skill and judgment, no further action is required. If the Committee identifies concerns related to their knowledge, skill, and judgment, they will be invited to make a submission outlining the changes they have made addressing the concerns. The Committee makes a final decision that their knowledge, skill and judgment is either satisfactory and no further action is required, or unsatisfactory and they will be required to comply with the Committee's recommendations.

FAQs

Am I required to undergo a peer and practice assessment?

All naturopaths who are registered in the General Class with the College of Naturopaths of Ontario are required to participate in the program.

I do not see patients do I need to participate in the peer and practice assessment program?

If you are registered in the General Class and you do not see patients, you are still required to participate in the peer and practice assessment program. If you have a non-clinical term, condition, and limitation on your registration, you will undergo a modified assessment which includes a review of your professional portfolio and the pre-selected standards of practice, policies and/or guidelines. If you do not have a non-clinical term, condition, and limitation on your registration, you will be required to undergo the full peer and practice assessment.

I am registered as Inactive do I need an assessment?

No. Inactive Registrants are not required to participate in any of the components of the Quality Assurance Program.

I am a new Registrant and have just started working. How will this affect my participation in peer and practice assessment?

New Registrants of the College will be exempt from the peer and practice assessment program for 3 years.

I am on leave from my employment. What are my responsibilities for peer and practice assessment?

If you are selected for a peer and practice assessment and are on leave from your naturopathic practice, you may submit an extension request. An application for an extension must be submitted in writing and received by the College within 30 days of being notified of your selection for a peer and practice assessment. The Quality Assurance Committee will review all requests and makes determinations on a case-by-case basis.

I work in more than one practice location. Do I need to undergo more than one assessment?

No. Peer and practice assessments are about assessing the Registrant. The premises review component of the assessment is to be completed for your primary practice location only.

What will happen if I refuse to participate in a peer and practice assessment?

Participating in a peer and practice assessment is a mandatory part of the Quality Assurance Program. Refusing to participate may be considered non-compliance with the QA Program and the Quality Assurance Committee may refer the matter to the Inquiries, Complaints and Reports Committee (ICRC).

How long do I have to complete my peer and practice assessment?

You have approximately six months from the date of selection by the Quality Assurance Committee to complete your peer and practice assessment.

How are assessors selected and what kind of training do they receive?

Assessors are selected based on the cover letter and resumé they submit, as well as an interview with eligible applicants. Peer assessors are trained by the College and must participate in an annual training workshop to update their skills and techniques, and to review and improve on outcomes. All assessors must be Registrants in good standing with the College, must have actively practised naturopathy for at least 3 years, and have undergone a peer and practice assessment themselves.

Do I need patient consent to allow the assessor to look at my patient files?

No. The *Regulated Health Professions Act, 1991* specifically states that regulatory health colleges may review patient files when conducting assessments of Registrants. Privacy legislation supports this right to access patient information in this context.

If you have any questions about peer and practice assessments or any aspect of the Quality Assurance Program, or would like to become a peer assessor, please contact qa@collegeofnaturopaths.on.ca