



CPSO

GUIDELINES FOR COLLEGE-DIRECTED PRACTICE MONITORING

INTRODUCTION

Reasons/Goals of Practice Monitoring

The College, through its committees, may require a physician's practice to be monitored.

PURPOSE OF GUIDELINES

These Guidelines set out the College's *general* expectations and processes for physicians engaged in a College-directed Practice Monitoring arrangement with regard to:

- principles of Monitoring;
- qualifications and characteristics of a Monitor;
- terms of Monitoring;
- approaches to Monitoring,
- content of Monitoring reports;
- basis for immediate reports to the College; and
- roles of Practice Monitors and monitored physicians.

These are *general* guidelines only. All monitored physicians and Practice Monitors are asked to sign detailed undertakings, which set out the College's *specific* expectations.

TERMINOLOGY

Practice Monitoring is a form of supervision that focuses on ensuring that a physician is in compliance with the terms of his or her restrictions, undertaking or order.

A *Practice Monitor* is an individual who undertakes to ensure a physician's compliance.

PRINCIPLES OF PRACTICE MONITORING

Principles of Practice Monitoring are applied in a consistent and responsible manner. They are:

1. Safe and effective patient care is the priority in all Practice Monitoring situations.
2. The Practice Monitor's ultimate responsibility is to the College; the Practice Monitor must ensure the monitored physician adheres to orders and undertakings with the College.

QUALITIES OF A PRACTICE MONITOR

While the College ultimately approves the Practice Monitor, physicians to be monitored are generally required to suggest potential Practice Monitors.

College's Guidelines for Approval of Practice Monitors

The Practice Monitor must not currently be the subject of any disciplinary or incapacity proceeding. If there is an active public complaint against a Monitor, the circumstances of that matter will be reviewed on an individual basis.

The College, as part of its consideration/approval process, generally seeks the following qualities in a Practice Monitor:

- One who has an Ontario certificate of registration for practice (or a member of another regulated health profession may be acceptable to the College for certain Practice Monitoring roles).
- One who currently practises in Ontario.
- One who has a minimum of five current and consecutive years of practice in the scope of practice to be monitored.
- One who has an acceptable College history.
- One who has sufficient time and resources necessary to take on the responsibility of monitoring a physician and to fulfill all terms of the College undertaking.

In addition to the above, the College also considers relationships that could exist between the Practice Monitor and monitored physician.

Disclosure of Pre-Existing Relationship between Practice Monitor and Monitored Physician

The Practice Monitor and monitored physician **must** disclose to the College *any* pre-existing relationship to determine whether the relationship interferes with the Practice Monitor’s ability to objectively monitor the physician.

Examples of relationships that may disqualify a proposed Practice Monitor include (but are not limited to): family, social/personal, physician-patient, and business. The College will determine whether alternative monitoring arrangements are warranted.

THE TERMS OF PRACTICE MONITORING

- The terms of the Practice Monitoring (i.e., nature, duration, level, and frequency of visits and reports) are set out in undertakings, decisions, or orders.
- The Practice Monitor and the monitored physician must discuss, through an initial meeting, the terms of the monitoring. Discussion via secure web-based technology acceptable to the College may be permitted.
- The terms of the Practice Monitoring may be changed only on the approval of the College.
- The College determines when the Practice Monitoring is complete. Completion will be determined by the goals of the Practice Monitoring having been met.

APPROACHES TO PRACTICE MONITORING

- Practice Monitoring involves a regular review of a physician’s practice. The extent and frequency of the Practice Monitoring will be determined by the details as outlined in the Practice Monitoring undertaking.
- Practice Monitoring may require the direct observation of a physician in their practice.
- The Practice Monitor verifies that the monitored physician is practising in accordance with the terms of their undertaking or order, or with the terms and conditions imposed on the physician’s certificate of registration by a Committee.
- A team-based approach to Practice Monitoring is sometimes acceptable¹ and desirable.

¹Team-based Practice Monitoring must be formally approved by the College. One physician is designated as the “lead Practice Monitor” and serves as the **primary contact** for the College.

PRACTICE MONITORING REPORTS

- The Practice Monitor will submit regular reports to the College in accordance with the requirements set out in the undertaking.
- The Practice Monitor’s undertaking will set out the schedule for providing reports to the College. It is essential that the Practice Monitor meets this schedule to enable the College to monitor the arrangement. In addition, the reports must be detailed and must contain a meaningful assessment of the physician being monitored.
- Reports must be signed and dated by the Practice Monitor.
- The Practice Monitor’s responsibility is to the College. The reports to the College, as the feedback to the monitored physician, are intended to help the physician practice safely and more effectively.

BASIS FOR IMMEDIATE REPORTS TO THE COLLEGE

There may be circumstances in which a Practice Monitor should contact the College immediately. Contact should be with the assigned College staff person to discuss the matter. This may occur outside of the regular schedule of reports as outlined in the Practice Monitoring undertaking. These circumstances are in addition to the obligations set out in the College’s [“Mandatory and Permissive Reporting”](#) policy that applies to all physicians.

The Practice Monitor’s specific obligations will be set out in an undertaking with the College, but generally include the requirement for Practice Monitors to report **immediately** to the College in the following situations:

- any practice or conduct that may expose patients or others to risk of harm or injury;
- the monitored physician is acting in a manner that suggests any concern that the member may be incapacitated;
- any failure to comply with the terms of their undertaking or Committee direction/order, which includes missing a meeting or an appointment with the Practice Monitor without sound reason, or being uncooperative;
- the inability of the Practice Monitor to continue in the role, or to fulfill obligations on a timely or temporary basis, e.g., due to illness, vacation, personal emergency, etc.; or
- if issues arise that could impact the Practice Monitor role, e.g., becoming the subject of a complaint or investigation (by the College or by the regulator if a member of another regulated health profession), or having a conflict of interest.

PRACTICE MONITORING: A form of supervision that focuses on ensuring that the physician is in compliance with the terms of his or her restrictions, undertaking or order.

Examples:

Practice Monitor may be required to:

- ensure a physician is not seeing types of patients prohibited by terms and conditions;
- ensure required signage is prominently posted in the office;
- maintain patient logs, initial corresponding records; and
- monitor and report on a physician’s conduct or behaviour in the practice setting.

Practice Monitor Expectations and Responsibilities:

- signs an undertaking directly with the College;
- reviews any pertinent background materials;
- maintains a professional relationship with the monitored physician;
- verifies that the monitored physician is practising in accordance with the terms of his or her undertaking or order, or with the terms and conditions imposed on the physician’s certificate of registration by a Committee;
- submits objective reports to the College at intervals prescribed by the College; and
- reports immediately to the College any situations outlined in the [Basis for Immediate Reports to the College](#) section.

Quick Link: [Qualities of a Practice Monitor](#)

Monitored Physician Expectations and Responsibilities:

- agrees to information sharing amongst all relevant entities (as per undertaking) to facilitate Practice Monitoring;
- is open, honest, and collegial with his or her colleagues and Practice Monitor;
- demonstrates meaningful signs of progress towards meeting College expectations;
- complies with the terms of his or her undertaking or order;
- assists the Practice Monitor in fulfilling obligations; and
- acknowledges responsibility for payment of all fees, costs, charges, expenses, etc. arising from the Practice Monitoring.

Effective: June 3, 2022