 <p>Winnipeg Regional Health Authority Office régional de la santé de Winnipeg Caring for Health À l'écoute de notre santé</p> <p>PRIMARY HEALTH CARE OPERATIONAL GUIDELINES</p>	<p>Operational Guideline: <i>Client Follow Up-Duty of Care</i></p>	<p>Guideline Number: <i>PCOG#16</i></p>
	<p>Approved By: <i>Primary Health Care Leadership</i></p>	<p>Pages: <i>1 of 5</i></p>
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1. INTENT


- To ensure Primary Health Care teams are aware of their duty to communicate results to clients and/or to make reasonable efforts to ensure appropriate follow-up is arranged where necessary
- To outline a standardized process for ensuring communication of test results and other Personal Health Information to clients outside of the clinic setting
- To outline a standardized process for confirming clinic appointments with clients

2. BACKGROUND

- An environmental scan across primary care sites in Winnipeg revealed that there were varying processes to guide practice when clients cannot be contacted to receive health related information both within operating hours and after hours. An increased risk of non-communication and suboptimal client care may result when there is no standardized process for ensuring the result of any test ordered is communicated to the client.
- Dependence on follow-up visits to inform all clients of results creates risk that could lead to an inappropriate use of primary care time that is contrary to principles of Advanced Access
- Use of Electronic Medical Record (EMR) for results tracking can enable the safe review of results and ensure that patients are contacted in a safe, efficient, and timely manner
- Until recent, only Primary Care Assistants were permitted to use a unique email account for the sole purpose of confirming primary care provider appointments with a client of the clinic, no Personal Health Information could be communicated. With COVID-19 pandemic response plans introduced in late March 2020 came the need to transition client appointments almost overnight from occurring in-person to virtual (via telephone/teleconference) to comply with mandatory social distancing requirements. As a result of the pandemic urgency, significant technological advancements were made in a short period of time including the ability to use email if a provider reasonably believes that emailing the information is the only available method of communication or the only way to send the information.

3. DEFINITION

- **Personal Health Information (PHI)** - Recorded information about an identifiable individual that relates to:
 - the individual's health or health care history, including genetic information about the individual; or
 - the provision of health care to the individual
 And includes:
 - the PHIN (personal health identification number) and any other identification number, symbol or particular assigned to an individual;
 - any identifying information about the individual that is collected in the course of the provision of health care; or

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- personal information such as financial position, home conditions, domestic difficulties or any other private matters relating to the individual which have been disclosed to the Trustee

Additional guidance and resources related to Personal Health Information can be found at [WRHA Regional PHIA Policies](#)


4. **GUIDELINE**

4.1 Guiding principles to follow include:


- Upon entry to the health service, expectations regarding the client's participation in care including being available for follow-up as required will be discussed
- The client will be asked to inform the clinic of the preferred mechanism for the clinic to contact them and to ensure confidentiality is maintained, whether phone messages can be left and/or email can be used for confirming appointments
- The client will be asked to provide current contact information including cell phone (if applicable) and emergency alternate contact and be reminded to inform the clinic of any changes to this information
- The client will be encouraged to contact the health care team or clinic if any questions regarding health services, tests, or follow-up requirements arise
- The more serious the implications of a particular result, the increased urgency of the information to be communicated. In such instances, all the more effort should be made to locate the client. Consultations regarding the seriousness of a condition or result are done with a Physician or Nurse Practitioner.
- Decisions regarding attempts to reach the client are individualized and context dependent. All attempts to contact a client shall be documented in the client record.
- Ultimately the competent client has the right not to respond to contact attempts and to choose whether or not to engage in their health care

4.2 It is important to ensure client's demographic information is current. Clients should be asked by the Primary Care Assistant for any changes in phone numbers, email address, or contact information every time a client checks in for visit. Per WRHA Privacy, if the client agrees to provide the email address it is considered explicit consent. In the event the client does not wish to receive any form of communication including appointment confirmations via email, the decline is to be documented in the email address section using the text "email communication declined". This will serve as an indicator the client has previously been asked this question.



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- 4.3** When a client needs to be contacted regarding health-related information during operating hours, some suggestions in sequential order for doing this are as follows:
- Attempt to contact client via primary telephone number, emergency contact telephone number or email
 - Contact health facilities to see if client has been admitted
 - Send client a letter/registered letter to primary address
 - Place a global message (pop-up alert) within the scheduling system of EMR indicating the client requires follow up in the event that the client accesses the system for another reason. Global messaging must be compliant with [Global Pop-Up Alerts Within Community Electronic Records](#) Community Health Information Services Guideline.
 - Decisions regarding which steps to take, if steps should be repeated, and specific timing of each incremental step should be made in collaboration with the Team Manager and other relevant team members particularly the responsible ordering provider or designate after considering the urgency of the situation
- 4.4** When a client needs to be contacted regarding urgent health related information after hours, the process outlined in [PCOG#11 - Results Management-Critical Result, Test or Report Values](#) should be followed
- 4.5** If these mechanisms do not result in successful contact of the client in order to communicate health related information, enlist the support of other health team agencies or programs, including but not limited to:
- Public Health - if Communicable Disease (or reportable disease)
 - Public Health - if client receives Prenatal Services
 - Winnipeg Integrated Service (WIS) partners including EIA Worker - if client is receiving services from this program
 - Mental Health Proctor - if client is already receiving services from this program
 - Community Outreach Workers
- 4.6** As a rule, email is not considered a secure method of disclosing PHI and should not be relied upon where more secure methods of communication are available. If a provider reasonably believes that emailing the information is the only available method of communication or the only way to send the information, they are able to use their personal assigned [@wrha.mb.ca](#) email account to communicate with a client as long as all protocol outlined in *APPENDIX A – Emailing Personal Health Information Guideline* is observed and strictly adhered to.
- 4.7** For administrative purposes especially where multiple Primary Care Assistants are responsible for this task, the use of a unique email address for confirming primary care provider appointments with a client of the clinic is permitted and a good strategy for reducing No-Shows. Primary Care Assistants are not to use their personal assigned [@wrha.mb.ca](#) email account for confirming client appointments but rather a unique email account (i.e. [Aikins-Admin@wrha.mb.ca](#)) that can be set up through Digital Health Service Desk.

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Protocol to guide Primary Care Assistants in the use of a unique email address for confirming client appointments includes:

- The content of the email will be limited to a single email message confirming the date/time of the appointment along with the clinic name/address:
"This is a reminder of your medical appointment scheduled at 1:00 PM on DD/MMM/YYYY at Access River East Primary Care located at 975 Henderson Highway"
- Aside from the email address itself, no additional identifiable information (i.e. client name) will be included in the email
- The email account will be set up such that the client will be unable to respond thereby eliminating the possibility of back and forth communication
- The email message will include an automatic general statement specifying that any follow up discussion be conducted by telephone or in-person:
"Please note this email address is for appointment notification purposes only and is not checked for messages. Should you have any questions or concerns, contact the clinic direct at XXX-XXX-XXXX"

4.8 Texting should never be used as a first means of communication or as a matter of course where other more secure options exist. When texting is the only option available, it is permitted provided all identified requirements are observed and strictly adhered to as outlined in *APPENDIX B - Texting With Individuals Receiving Health Care Services From WRHA*.

4.9 Current WRHA policy prohibits contacting clients via social networking sites

5. SOURCES/REFERENCES


- Canadian Medical Protective Association (CMPA):
 - "Follow-Up of Lab Reports and Tests - A key to Patient Safety" (2004)
 - "Responsibility for Follow-Up Investigations" (2008)
 - "How Effective Management of Test Results Improves Patient Safety" (2011)
- In consultation with Shared Health Chief Privacy Officer, Regional Primary Health Care Quality Team, Community Area Directors and Primary Health Care Leadership (August 2019)
- In consultation with Shared Health Chief Privacy Officer, WRHA Health Information Management and Primary Health Care Leadership (August 2020)

6. PRIMARY AUTHOR

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7. ALTERNATE CONTACT

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8. APPENDICES

- **APPENDIX A** – Emailing Personal Health Information Guideline
- **APPENDIX B** - Texting With Individuals Receiving Health Care Services From WRHA

SCOPE: Applicable to all WRHA Primary Care Direct Operated Clinics, Walk In Connected Care Clinics (including Access Winnipeg West, Access Fort Garry and McGregor) and Centralized Primary Health Care Programs/Services.