

Psychotherapy Charting Guidelines General Psychiatry Residency Program

Rationale: Timely, comprehensive documentation/charting is a key skill for any psychiatrist in the face of the establishment of more rigorous standards with regards to accountability from licensing bodies (for example, the CPSO here in Ontario). Moreover, maintaining the highest documentation standards is an integral part of providing good clinical care.

Below is a brief algorithm to guide trainees in psychotherapy documentation. For more comprehensive guidelines, please refer to the CPSO guidelines.

https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Medical-Records-Documentation/Advice-tothe-Profession-Medical-Records-Documenta

Section 1: The Documentation Lifecycle

Beginning

- Register patient at your site
- Establish chart for patient that includes a comprehensive initial psychiatric consultation note (see CPSO Guidelines regarding the minimum content) including the referral request
- Storage of chart /medical records must be secure and must ONLY be at the site where the patient is being seen do NOT bring chart or any medical records pertaining to the patient home with you

In the case where the patient cannot be registered under the psychotherapy supervisor (e.g. psychotherapy supervisor is not a physician), residents must register the patient under their core rotation supervisor (or another physician who is on staff at the hospital where the patient is being seen) in order to be the physician of record on the chart. The physician of record should be kept up to date regarding patient progress and the patient should be made aware of the arrangement.

Middle

- Progress notes
 - o Include:
 - Assessment/opening note
 - Progress Notes
 - Termination note
 - Photocopies of homework (if any)
 - See Section 2 for further guidance regarding progress notes
- Process Notes
 - from supervision/psychotherapy sessions need to be securely stored (NEVER at home or in your brief cases) and are not part of the chart; process notes should not be recorded on the patient's chart; do not include any identifying data of the patient in the process/supervision notes (no full names; for example initial of first name would be acceptable); they should be shredded at the end of each rotation.

Transitions

- Transferring patients between sites
 - o when a resident and his or her patient changes sites:

- chart should be closed from the site that the resident is leaving and the
 patient should be registered, along with a new chart being opened at the site
 where the patient will be subsequently seen. In addition, the patient needs to
 be informed who the new psychotherapy supervisor is and the first clinical
 encounter at the new hospital site has to be either a) in person or b) a video
 consultation (with a referral from another physician such as the previous
 supervisor) to determine if the patient is suitable to continue virtual
 psychotherapy delivered by a resident (to satisfy OHIP billing requirements for
 ongoing virtual psychiatric care)
- consent must be signed for transfer/communication of information to the new site (post- form online)
- What is transferred (with consent)?
 - HIGHLY RECOMMENDED summary of progress from last hospital site, such as: themes discussed, changes in mental status/functioning/goals, and formulation, along with a plan that documents who the supervisor was and who the supervisor will be (when known) along with the new site that the care will be delivered in; and this summary would be the only thing transferred to the new chart

Ending (Termination)

- A summary note of the nature and course of the therapy including (but not limited to the following)
 - Progress made during therapy
 - Discharge plans, if any (e.g. referral for long-term therapy after course of CBT, marital therapy, return to GP for follow-up etc.)
 - o Patient's response to termination
 - o Mental status at time of termination
 - Comment on patient's clinical status at time of termination (e.g. if being treated for MDD, if depression is in partial or full remission etc., including any relevant rating scores if relevant)
 - Send the summary discharge note to the GP or referring physician to inform them of the termination of therapy and any discharge plans

Section 2: Progress Notes for Individual Psychotherapy

All notes MUST

- Include the date, start and stop time, patient's name and medical record number and the name of the psychotherapy supervisor
- Be legible, permanent, preferably completed the same day, signed (legibly and identifiably)
- Be stored in a secure place ONLY at the site where the patient is being seen
- Document cancellations or no-shows, document telephone calls, document if the patient was seen with anyone, document information from other sources (if any)

Recommend use of SOAP format (however if you don't use the SOAP format, please ensure that the following information is included in progress notes):

- <u>Subjective</u> Content that the patient reports during the session (using quotation marks and paraphrases where appropriate), (*should not be speculative or interpretive). Developments since last visit, response to therapy
- <u>Objective</u> pertinent mental status (may be brief but must contain information relevant to the process of the session and the patient's condition), must comment on presence or absence (and nature) of suicidal ideation
- <u>Assessment</u> diagnosis (if any), themes, course / trajectory, response to treatment, safety concerns. May include summation of physician's input (for example, even though the physician has been silent throughout the session he or she may record an analysis of the patient's ongoing issue, or can summarize what was communicated by the physician to patient during session).
- <u>Plan</u> therapy (type, total number of sessions if time-limited, frequency of appts, next appt), medications (*type and dosages of all medications, specify any changes), referrals, review in supervision (include supervisor's name)

Forgotten or late entries, errors or omissions

- Enter forgotten or late information at the earliest opportunity in the next available space in the chart include the date and time the session was held AND the date the information was recorded
- Additional comments go in a separate entry do not add to / remove from or alter a prior entry
- Corrections should still leave the erroneous information visible / retrievable

All charts are potentially shared charts

- Do not add to or alter someone else's note
- Do not leave blank lines between entries

Patient's rights

- Patients have the right to view their chart if they so request; however, patients must make such requests through health records
- If such a request arises it should be discussed in supervision

E-mailing / electronic communication

Please see CPSO guidelines on email communication with patients

https://www.cpso.on.ca/Physicians/Policies-Guidance/Policies/Protecting-Personal-Health-Information/Advice-to-the-Profession-Protecting-Personal-Healt

• AVOID this type of communication if possible as it is difficult to guarantee secure confidentiality

Legal risks: There are three potential areas for liability in email communication: confidentiality, privacy and security; timeliness of responses; and clarity of communication.

• If this mode of communication is used, all identifying data must be removed.

Below is a summary from CPSO edialogue in 2022: https://dialogue.cpso.on.ca/2022/06/email-communication-can-pose-risks/

Where you determine that it is reasonable to use unencrypted e-communication, you must obtain the patient's express consent, which includes providing information about the risks and limitations of using unencrypted e-communication (see below). It is not sufficient to rely on implied consent based on the fact that the patient initiated the e-communication, since the patient may not be (fully) informed of the risks of communicating PHI over unsecure email. Be sure to also document that express consent was obtained.

Where you determine in the circumstances that it is not reasonable to communicate through unencrypted e-communication, consider suggesting that the patient use a more secure method.

When obtaining the patient's express consent to use unencrypted e-communication, physicians must inform the patient about:

- How this kind of e-communication will be used;
- The type of information that will be communicated;
- How the e-communication will be processed; and
- The limitations and risks of using unencrypted e-communication.

Note that this guideline cannot cover all possible scenarios arising during the conduct of psychotherapy and any situations the resident is uncertain about can and should be discussed in supervision.

Group and multi-person documentation guidelines

Family/Couple Therapy: If the family of an identified patient is interviewed for the purpose of obtaining collateral history and information, this can be entered into the chart of the identified patient; if family therapy is the primary treatment, notes can also be entered into the chart of the identified patient; however, if couple therapy is the primary treatment , each partner should be registered as a patient, and the same note for each session should be entered (copied) into both charts (*please confer with you supervisor to comply with documentation standards at your site).

Group Treatment: Documentation of group therapy involves a lower level of confidentiality and anonymity than can be achieved in individual psychotherapy and patients should be informed of this.

The ideal standard would be to have a separate entry for each member of each group session, and in some hospital settings (i.e. where there are electronic records), this is a requirement. However, the

burden of documentation in this model is such that an alternative method of documentation is sometimes used. This includes the following:

i) A notebook is kept for the group as a whole, into which is entered an attendance log noting attendance at each meeting; stop and start times, date of meeting, the nature of issues addressed in that particular group; progress or obstructions to progress; any unusual developments or difficulties emerging in that session. This book becomes a permanent record of the group treatment and should be maintained as the treatment record.

ii) At the beginning of treatment patients should be listed in this book by their name and last initial, and a hospital identifying number. Last names should not be used in this treatment record.

iii) A progress note that is relevant to each individual patient should be charted at regular intervals in each individual's chart. It should refer to the group record. These progress notes supplement the combined group therapy record, that serves as the permanent group therapy record. It is proposed that the following intervals be utilized, for groups:

16 weeks duration or less, a progress note should be charted every four

weeks

16 - 40 weeks, a progress note should be charted every eight weeks

Ongoing and open-ended groups, a progress note should be charted every three months

NOTE that residents should consult with their group psychotherapy supervisor to receive guidance on which format of documentation should be used in the hospital setting where the group is held.

Created by: Associate Lead, Psychotherapy with members of the Psychotherapy Committee **Approved at PRPC:** December 4, 2023 **Next Review:** 2026