POSTGRADUATE MEDICAL EDUCATION

SCHULICH SCHOOL OF MEDICINE AND DENTISTRY

ASSESSMENT DATA SECURITY POLICY

Revised: November 18, 2022
Approved by PGME Committee: December 14, 2022
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DEFINITIONS

Academic Advisors: Also known as mentors, faculty advisors, or in Elentra, tutors.

Entrustable Professional Activities (EPA): Entrustable tasks of a discipline specific to each stage of training.

Elentra: The learning management system used for Competence by Design (CBD) assessments for the majority of the postgraduate accredited training programs.

POLICIES

- Royal College CBD Guidance Document: Best practices in maintaining security of CBD assessment Data
- Freedom of Information and Protection of Privacy Act (FIPPA)

PURPOSE

This policy provides guidance on protecting the privacy and security of postgraduate medical education trainees' assessment data.

SCOPE

This policy applies to all postgraduate medical education (PGME) training programs at the Schulich School of Medicine and Dentistry, Western University. PGME training programs include residency programs, area of focused competence (AFC), and clinical fellowships.

Protection of personal privacy is a principle of the Ontario Freedom of Information and Protection of Privacy Act (FIPPA). Trainee assessment data is personal information and falls under the requirements of this act. This policy does not supersede the requirements of FIPPA.

Policy Statements

- Access to electronic resident assessment data requires a unique username and password. Passwords must not be shared with anyone else.
- Sharing of electronic assessment data must be via secure channels supported by Western University and/or its affiliated hospitals (e.g., Microsoft OneDrive and Teams). Only those who require assessment information to perform essential tasks (e.g., residents, academic advisors, Competence Committee members, etc.) shall have access to assessment data.
    - Postgraduate training programs are responsible for ensuring access to assessment data remains up to date (e.g., updating lists as Committee membership changes, etc.)
    - For specific access guidelines for PGME-supported learning management platforms, such as Elentra and one45, see the appendices.
- Defined access roles are created for both Elentra and one45 (see appendices). Consent must be obtained from postgraduate learners for use of their assessment information beyond these roles, and for tasks such as program evaluation (e.g., Internal Reviews or site surveys), or for research purposes. Consent must include who is accessing/reviewing a learner's assessment data and for what purpose.
- Any printed hard copy assessments must be stored in a physically secure location, with access limited to only those approved to view assessment data, and confidentially shredded when no longer required.
- Downloading assessment material from online platforms must only be done from a secure device and private network. Downloaded documents must be deleted when no longer in use.
- In the event of a data security breach, applicable stakeholders (e.g., impacted trainees) will be notified.
- Assessment data should be securely stored for a length of time that is appropriate to the needs of the program, but for no less than eight years for accreditation purposes.

Appendix A: Elentra Security, Data Storage and Access

Flexibility is provided for Program Directors to decide to whom access is granted to various data in Elentra including assessor statistics reports, raw EPA data reports, resident EPA details and summary reports, and resident milestone summary reports.

These confidential reports are downloadable from Elentra and as a result access should be limited.

Reports and Default Access

Assessor Statistics Report
The Assessor Statistics report provides data on the completion of EPA assessments by faculty (not including data from pilot EPA assessments) and by residents. It includes data pertaining to the number of assessments that were requested vs completed, the length of time for completion of EPAs, entrustment scale distribution, and collated narrative feedback provided by the assessor.

By default, access to the following reports is granted to the following:

Data for all faculty appointed to the program: *(N.B.: Program Administrators (PAs) have full capability to edit this faculty list in Elentra as some programs have cross-appointed faculty.)*
- Program Director
- Program Administrator
- Schulich PGME Administration
- Schulich Information Services (IS)

Data for individual faculty:
- The individual faculty member

Data for all residents in a program:
- Program Director
- Program Administrator
- Schulich PGME Administration
- Schulich Information Services (IS)

Data for individual residents:
- The individual resident

Raw EPA Data Report

The Raw EPA Data report provides source data for EPA assessments that can be exported to Excel for further filtering. It includes all data available for each EPA assessment including, but not limited to, the EPA title, form type, assessor name, resident name, trigger method, encounter date, completed date, entrustment score, milestone scores, assessment cues, comments, and contextual variables.

By default, access to this report is granted to the following:

Data for all residents of the program:

- Program Director
- Program Administrator
- Faculty Advisors (for assigned residents only)
- Schulich PGME Administration
- Schulich IS

Data for individual residents:
- Residents

Resident EPA Details Report

The Resident EPA Details report provides granular data for EPAs including title, key features, assessment plan, number of requests vs completions, entrustment score, contextual variables, milestones, and comments.

By default, access to this report is granted to the following:

Data for all residents of the program:
- Program Director
- Program Administrator
- Competence Committee Members
- Competence by Design (CBD) Lead
- Faculty Advisors (for assigned residents only)
- Schulich PGME Administration
- Schulich IS

Data for individual residents:
- The individual resident

Resident EPA Summary Report

The Resident EPA Summary report provides high level data for EPAs including title, and number of requests vs completions. A link in this report leads to the Resident EPA Details report if further information is required.

By default, access to this report is granted to the following:

Data for all residents of the program:
- Program Director
- Program Administrator
- Competence Committee Members
- CBD Lead
- Faculty Advisors (for assigned residents only)
- Schulich PGME Administration
- Schulich IS

Data for individual residents:
- The individual resident

Resident Milestone Summary Report
The Resident Milestone Summary report provides assessment data for the milestones of each EPA.

By default, access to this report is granted to the following:

Data for all residents of the program:
- Program Director
- Program Administrator
- Competence Committee Members
- CBD Lead
- Faculty Advisors (for assigned residents only)
- Schulich PGME Administration
- Schulich IS

Data for individual residents:
- The individual resident

Additional Access Requests

To add additional access to any Elentra-based report, for individuals or groups, Program Directors have two options:

1. The Program Director, or designate, can download a report and share it with appropriate individuals. Of utmost importance is the protection of confidential data when downloading and sharing data.
2. The Program Administrator of a program can amend the Program Director, Competence Committee, or Academic Advisor member list with the program setup section of Elentra which will automatically update corresponding access to reports.
3. The Schulich PGME Administrator can amend all access roles within Elentra.

Maintenance of Access

It is the responsibility of each residency training program to maintain current lists of Competence Committee and Academic Advisor members in Elentra when individual roles change (e.g., a change to CC membership). This ensures that only those currently in positions requiring access are able to review and download reports.

Appendix B: one45 Security, Data Storage and Access

Flexibility is provided for Programs to decide to whom access is granted to various data in one45 including trainee evaluation reports, faculty evaluation reports, and rotation evaluation reports.

These confidential reports are downloadable from one45 and as a result access should be limited.

Reports and Default Access

By default, access to the following reports is granted to the following:

- Program Director
- Program Administrator
- Schulich PGME Administration
- Schulich Information Services (IS)

Access to reports can be granted to individual users as opposed to access based on a role. This access is given by Schulich PGME administrative staff upon request from a Program Director or Program Administrator.

Maintenance of Access

It is the responsibility of each residency training program to inform the Schulich PGME Administration when someone's access should be added or removed. This ensures that only those currently in positions requiring access are able to review and download reports.