

Medical Trainee Academic Records and Data Guidelines

Introduction

Preamble

McMaster University Postgraduate Medical Education (PGME) recognizes the importance of maintaining secure storage and appropriate access to the records of postgraduate medical trainees, either stored electronically or as paper files. As of 2015, the PGME office began using the Michael G. DeGroot School of Medicine's integrated Student Information System (MedSIS) and shifted to electronic student records. PGME also maintains a second digital trainee file for all training information that cannot be housed in MedSIS, stored on the Faculty of Health Sciences secure server. Before 2015, all medical trainee records were paper files. At present, all paper files are stored at a secure off-site document storage facility. In addition, most programs create a trainee record (either paper or electronic) outside of MedSIS to collate relevant information related to their training. The program ensures each record is secured in their department (using a secure McMaster server) and appropriate protocol. Electronic and paper files are secured and protected according to University guidelines and applicable privacy policies.

Purpose

McMaster University and the PGME office support appropriate access to and privacy of official trainee records consistent with its commitment to the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#) requirements. These guidelines define postgraduate medical trainee records (referred to as 'record' in this document) and the process governing access to such records, their privacy, safe storage, and retention per [McMaster University's privacy and information management](#) policies, practices and guidelines, those of its affiliated teaching sites, the [Professional Association of Residents \(PARO\)](#), the [Council of Academic Hospitals of Ontario \(CAHO\) Collective Agreement](#), and the Council of Ontario Faculty of Medicine.

Scope

These guidelines apply to the academic and training records of all postgraduate medical trainees (residents and fellows) who were previously registered, currently registered, or graduated from postgraduate medical training at McMaster University.

General Principles

1. All records of postgraduate trainees are confidential and managed in compliance with the *Freedom of Information and Protection of Privacy Act* and university privacy policies (refer to [McMaster's Electronic Monitoring Policy](#)).
2. All records are securely stored and accessed according to [McMaster University guidelines](#).
3. Access to records is permitted only as defined in these guidelines.

4. All PGME records are retained for 100 years after the trainee's departure from the university. This operational retention supports requirements for the verification process. Once the retention requirement is met, records are transferred to university archives for appraisal and archival retention.
5. Postgraduate medical education programs and the PGME office collaborate to ensure each trainee's file is complete and representative of their training at McMaster.

Access to Academic Medical Trainee Records

Definition of a Postgraduate Medical Trainee's Record and Contents

6. A postgraduate medical trainee's record includes all information related to their training at McMaster University. PGME collects and stores trainee information using a two-pronged approach. PGME creates a PGME digital file, and a trainee is assigned a MedSIS account. This chart outlines what information is stored in each respective file.

PGME Academic Record Information	PGME Digital File	MedSIS Account
Personal Information: name, program, student number, citizenship, social insurance number, permanent and local postal address, email address, telephone, and cell phone number	X	X
Personal Professional Information: Medical Identification Number for Canada (MINC), College of Physicians and Surgeons of Ontario (CPSO) number, Canadian Medical Protective Association (CMPA) number		X
Enrollment Information: Application package, Canadian Residency Matching Service (CaRMS) application and supporting Curriculum Vitae, previous educational achievements and transcripts, passport information, personal letter of interest, personal photo, signed offer letter, test results (MCCQE/MCCQE1), funding letter and payroll set-up package (externally sponsored only)	X	
Registration Information		X
Assessment Verification Period (AVP), Pre-entry Assessment Period (PEAP) Information	X	X
Training Information: training lines, rotation schedule, electives, evaluations, etc.		X
Work Permit Documents: work permit, letter of eligibility, LIMA information, forms, letters, etc.	X	
Training Status: leaves of absence, part-time training, waivers of training	X	X
Doctor's notes relevant to leaves of absence	X	
Information regarding voluntary withdrawal or dismissal from the program	X	
Disciplinary Action: Suspension or any action that changes training status	X	X
CPSO Letters: Letters from Registration Committee	X	

Academic information specific to graduate studies or enhanced programming offered in PGME (e.g., Clinicians Investigators Program)	X	X
Transfer Information: Program transfer application package, reference letters, acceptance letter, program release letter	X	
Education Advisory Board (EAB) reports	X	
Appeals Review Board (ARB) reports	X	
Award Letters	X	
Trainee Assessment Data		X

Refer to [McMaster's Electronic Monitoring Policy](#) for more information.

Trainee Academic Record – Program File

7. Programs may choose to create a trainee record to collate relevant information related to their training (outside of MedSIS). Upon graduation, the contents of the trainee's program record (not already included in the PGME digital file nor MedSIS) will be sent to the PGME office (see timeline in Appendix A) to ensure PGME has a complete trainee file. Below is a list of documents commonly retained by the program and eventually transferred to the PGME office to complete the trainee's official record (not all documents listed may apply to all programs nor trainees).

Additional Documents that may be included in a Trainee's Program File

- Learning objectives
- Final In-Training Evaluation Report FITERS (up to 2021)
- Progress evaluations and end-of-residency summaries from the Program Director
- Exam results
- Education Plans (EP)
- Remediation documents, Enhanced Education Plans (EEP)
- Other academic information specific to graduate students or enhanced programming offered in PGME (e.g., Clinician Educator's Program).
- Specific meeting notes and essential emails between Program Director/Administrator and trainee
- Trainee Assessment Data
- 360° evaluations by allied health/nursing staff
- MacCare approval forms or elective approval forms from other institutions
- Any approvals for additional research/conference funding
- Evaluations not captured in MedSIS
- Awards
- Competence Committee Letters
- Research and QI project interval documents
- Thank you letters and participation letters to the trainee
- Additional information related to administration and training (including reference letters and program-specific requirements)

Access to Postgraduate Medical Training Records – PGME, FHS, McMaster University

8. In compliance with the university's Notice of Collection Statement, access to all postgraduate medical training records are permitted by PGME's Associate Dean, Managers, PGME administrative staff, and members of the MedSIS team.
9. All historical hard copy documents are accessible for recall from the secure storage facility by one (1) PGME staff administrator for verification request purposes (consent from the trainee is required).
10. McMaster University's Registrar may request access to PGME trainee's record as required for review, performance, auditing, and verification.
11. Access to MedSIS trainee files at each regional campus is permitted by the Regional Assistant Deans, Regional Campus Managers, and PGME program administrators at their respective campuses.
12. The program director and the program administrator have access to the postgraduate medical trainee's MedSIS file and any internal program files they have created.
13. University Advancement will have access to personal information included in the postgraduate medical trainees records required for fundraising activities, including maintaining contact with alumni.
14. For any other access not listed above, permission to access a current or past medical trainee records must be given by the PGME Associate Dean, Program Manager, or Assistant Program Manager, CBME Lead and may require the consent of the trainee.

Access to Postgraduate Medical Trainee Records – By Trainee

15. Postgraduate medical trainees are entitled to view their academic records and may informally request access to their own records. The process differs based on a trainee's registration status, and restrictions apply to some information contained in the files.

PGME Digital Files

16. The PGME office holds trainees' digital academic records. Trainees currently registered at McMaster or who graduated from training may have access to view their digital record (post-2015) except for information related to admission or their transfer file. Trainees are not permitted to access this information to preserve the confidentiality of the admissions assessment, review process, and the content of reference letters (as this information has been obtained on the implied understanding that reference letters will remain confidential). Trainees may request access to their file by contacting the PGME office (postgd@mcmaster.ca).

MedSIS Accounts

17. As of 2015, each postgraduate medical trainee has an academic record in MedSIS. Upon becoming a resident or fellow of McMaster University, a postgraduate medical trainee is granted access to most components of their MedSIS file. A trainee's access to MedSIS is

deactivated upon completion of the program; however, alumni of the program can request access to view their MedSIS record at any time.

Verifications or Access to Academic Records for PGME Alumni

18. PGME provides verification services for medical trainees who have graduated from McMaster. A formal written request is required to obtain verification confirmation from the PGME office. If a third party submits a request, written consent by the PGME alumni is needed to process the verification. Alumni will be subject to a processing fee if their graduation date exceeds two years from the request. All verification requests can be initiated by emailing postgd@mcmaster.ca.
19. A former postgraduate medical trainee may wish to review their academic record. PGME alumni or current trainees must submit a written request to access their academic records by emailing postgd@mcmaster.ca. If PGME alumni submit the request, the request may take up to 30 days to process by the PGME office. The requestor may be subject to a fee depending on the nature of the request.

Access by Third Parties

20. Requests for access records by third parties must be submitted to the university privacy office. The process to make a formal request for access to information includes completion of a request form, and submission of an application fee. Further details are provided on the [privacy office website](#).

Associated Hospitals and Clinical Teaching Sites

21. Names, addresses, email addresses, cell phone numbers, and rotation schedules will be provided for contact tracing, health screening, and the distribution of materials when all the following conditions are met:
 - 21.1. The name and address information are not released to a third party (except as noted in item 20).
 - 21.2. The name and address information are not used for commercial purposes.
 - 21.3. The materials to be distributed support or relate to the University, University activities, Hospital/Clinical, Hospital/Clinical Activities, emergent issues, or pandemic-related information and are not advertisements for non-University organizations.

Access by Others

22. Any other information contained in the official academic record shall be released to other persons and agencies only with the postgraduate medical trainee's prior expressed written consent, on the presentation of a court order, following the requirements of professional licensing, or certification bodies of the Ministry of Training, Colleges and Universities for an annual enrolment audit, or otherwise as required by law.
23. If a postgraduate medical trainee, alumnus or alumna is deceased, their representative shall be granted access to information in the individual's official academic record to the extent that such access relates to the administration of the deceased's estate.

Refusal of Access

24. PGME reserves the right to withhold certificates of postgraduate medical trainees and alumni who have outstanding debts or obligations to the PGME office or University or Hamilton Health Sciences as the paymaster.

Custodial Responsibility

Custody and Retention of Official Academic Records

25. Academic records are normally under the custodial responsibility of the Registrar; however, records related to postgraduate medical trainees are the custodial responsibility of the Postgraduate Medical Education Office, the Faculty of Health Sciences. Access to academic records is restricted to staff who require such access as directly required for their role and responsibilities.

Distribution of Surveys to Registered PGME Trainees

PGME Survey Participation

26. Researchers internal and external to McMaster often inquire about the distribution of surveys to registered PGME trainees for the purpose of data collection. Although PGME would like support and approve each request received, we anticipate that the distribution of multiple requests may result in survey fatigue by our trainees. PGME has established a Survey Distribution Request process for researchers who would like to collect data from PGME trainees at McMaster University.

Process

27. Fill out [Survey Distribution Request Form](#) and ensure all required information is uploaded for review.
28. The request will be added to the monthly Postgraduate Medical Education meeting for review of the documents, committee discussion, and decision.
29. The submitter will be notified by email if their request was approved (specific information about timeline and next steps) or if the PGEC committee has decided not to support the request. There is not appeal process if the request is denied.

Access to CBME Trainee Evaluation Data

30. The implementation of competency-based medical education (CBME), and more specifically the Royal College of Physician and Surgeon's Competency by Design (CBD) framework, has been underway in post-graduate medical education at McMaster University since 2017.
31. Quantitative and qualitative assessment data are housed in MedSIS, and this information is accessible to many stakeholders including trainees, faculty, program leads, academic coaches, Competency Committees, and RPCs. Trainee assessment data informs trainee reviews and progression decisions, program evaluation and quality improvement, scholarship, and program

to program transfers. This has introduced new considerations for the governance and management of trainee performance data.

32. The [CBME Data Governance Model](#) is aligned with [McMaster's Data Governance Policy](#) and is intended to bring structure and process to the access and utilization of trainee performance data for the purposes of program evaluation and continuous quality improvement, research, as well as other collaborative academic pursuits.
33. It is understood that any accepted data governance model would address the needs and interests of the notably varying program structures within PGME and align with any current or evolving McMaster policies and procedures.

Requests for CBME Evaluation Trainee Data

Process

34. [Submit a Data Request Form](#) to the CBME Administrative Coordinator (cbme@mcmaster.ca) ensuring all required information is included and indicates approval by the Program Director.
35. The request will be sent to the CBME Evaluation Committee for review and approval. Any requests that fall outside of the parameters of the policy will be reviewed for approval by the CBME Executive Committee.
36. Notification of the status of the request will be sent by email and any requested data export will be shared as promptly as possible.

Appendix A

- May/June – PGME pulls a MedSIS list of all trainees anticipated to graduate on June 30.
- May/June – PGME adds each respective program's graduating class list to the program MS Teams folder.
- May/June – Program will create a file in their program MS Teams folder for each trainee anticipated to graduate and review the program file. They will upload any of the documents listed above to the trainee's MS Teams folder for PGME access.
- July-December – PGME will transfer the documents for each graduating trainee from the MS Teams folder to the PGME secure drive.

Appendix B

- [McMaster University's Electronic Monitoring Policy](#)