Agenda

- Welcome and Introductions
- Revised Notice of Privacy Practices (NOPP)
- Revised *Authorization to Release Information* form
- Updated scan policy and training
- Updated faxing policy
- Duplicate and commingled charts update
- New and improved eSAF process for CROWN access
- Open Discussion
Welcome and Introductions

Please share your:
- Name
- Department
- Site Location
- Role
Revised Notice of Privacy Practices

Background

- Notice of Privacy Practices – aka the Notice, NOPP, NPP, Privacy Form, the HIPAA, the etc.
  - Provides a clear, user friendly explanation of rights with respect to protected health information (PHI) and the privacy practices of health care providers
- Moving to integrated electronic health record (Epic)
  - Collaboration with NYP and Weill Cornell Medicine - OHCA
  - Consistent forms
- New language on information sharing
  - Organized Health Care Arrangement (OHCA) / Joint Operating Agreement
- Reduce paper burden
Revised Notice of Privacy Practices

What You Need to Know

- Revised NOPP to all patients (once)
  - Please verify if NOPP was given by checking IDX when checking in patient
  - If date is before 4/2018, then give revised NOPP
Revised Notice of Privacy Practices

What You Need to Know

- Scan signed NOPP Acknowledgement into Enterprise 2017 HIPAA folder
- If a current revised and signed acknowledgement form is already there, no need to scan again
Revised Authorization to Release PHI

Background

- Authorization to Release PHI – aka Authorization, Release Form, Record Request, Auth Form, the HIPAA, etc.
  - Written authorization to release PHI completed by patient or designated representative (in some cases, must have supporting documentation – see Medical Record Request FAQs on ColumbiaDoctors HIM Intranet site)

- Moving to integrated electronic health record (Epic)
  - Collaboration with NYP and Weill Cornell Medicine
  - Consistent forms

- Moving to shared record release process
Revised Authorization to Release PHI

What You Need to Know

- Revised Authorization to Release PHI Form
  - Used when PHI is to be released, please do not include in welcome packet
  - As per Columbia policy, *Authorization to Disclose Patient Information*, Authorization to Release Form should be completed whenever we are releasing patient information
  - The Privacy Regulation specifically states that a covered entity “is permitted to use or disclose protected health information” for “treatment, payment, or health care operations,” without patient consent. – safer to have consent
  - Can be used at the hospital, physician practices, lab, radiology, etc.
  - Only valid if legible and complete
Revised Authorization to Release PHI

Authorization to Release Information Form

Legal Request Form

Alignment with NYP Form
Revised NOPP and Authorization to Release PHI Forms

Where to Find/Get Them

- CUIMC Office of HIPAA Compliance website
  - www.hipaa.cumc.columbia.edu
  - Go to Patient Forms (available in Spanish and English)
- Order from Columbia’s Print Services at printing@columbia.edu
  - Also available NOPP Poster and Acknowledgement Forms
  - Each site should appropriately laminate and display an updated NOPP poster in their lobby/waiting area
- ColumbiaDoctors HIM Intranet Site
Update to CROWN Scan Policy & Training

Background

- CROWN Scanning Purpose
  - Create a standardized process to accurately scan and index all documents (generated or created outside of CROWN)

- CROWN Scanning Policy
  - Ensures complete medical record
  - Captures clinical and administrative information not generated or interfaced with CROWN (e.g., outside medical records, reports from a lab not connected to CROWN, patient completed documents, downtime forms, etc.)
Update to CROWN Scan Policy & Training

What You Need to Know

- Use Enterprise 2017 Chart Group for all standard document types
- Scan documents now going to FollowMyHealth patient portal
  - For example, outside labs, outside radiology, camp or school forms/letters, return to work forms/letters
  - Do not put sensitive reports in Outside Lab or Outside Radiology folders
- Batch basket clean up – 30 day limit
- Importing documents now available to all scan users
- CROWN Scan Job Aides and Training videos available
Update to Fax Policy

Background

- OCR Near Miss
  - HIPAA Police – incident where records were inadvertently faxed to patient’s place of employment containing sensitive information

- Faxing originally invented in 1842
- Faxing least secure method of transmitting PHI
- Not well tracked and auditable
Update to Fax Policy

What You Need to Know

- When faxing, you should confirm the fax recipient / fax number
- Always use a cover sheet
- Always indicate the number of pages being transmitted
- Avoid sending sensitive patient information via fax, use a more secure method (e.g., encrypted email, etc.)
- If a fax was inadvertently sent to a wrong recipient:
  - Immediately contact the HIPAA Privacy Office at 212-305-7315; and,
  - Enter a ticket on the Healthcare SafetyZone Portal (the ColumbiaDoctors event and patient safety reporting tool)
- Periodically validate programmed fax numbers
Duplicate and Commingled Charts Update

Background

- Master Patient Index (MPI) - “Backbone” of EHRs & Data Exchange
- Implications on:
  - Patient care/patient safety
  - Legal/compliance
  - Revenue cycle/accurate billing & reimbursement
  - Data quality/reporting
  - Population health/predictive modeling
  - Reduced productivity/costly cleanups
- Commingled/Overlays - intermingling of two patients’ medical chart
- Duplicate medical records - more than 1 record for the same patient
Duplicate and Commingled Charts Update

Background

Algorithms – Not Perfect

Records that *seem* to match

Resulting error: false positive (commingle)
2 records linked under 1 MRN or EMPI

Records that *should* match

Resulting error: false negative (duplicate)
2 MRNs created for 1 patient
# Duplicate and Commingled Charts

## ColumbiaDoctors Duplicate Charts

<table>
<thead>
<tr>
<th>Source Name</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018*</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lawrence MRN Reg Interface</td>
<td>5,240</td>
<td>2,964</td>
<td>2,833</td>
<td>530</td>
<td>11,567</td>
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<tr>
<td>Interface Eagle</td>
<td>5,423</td>
<td>2,213</td>
<td>1,349</td>
<td>282</td>
<td>9,267</td>
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<tr>
<td>EMPI/ User</td>
<td>768</td>
<td>722</td>
<td>627</td>
<td>104</td>
<td>2,221</td>
</tr>
<tr>
<td>Other</td>
<td>118</td>
<td>145</td>
<td>0</td>
<td>0</td>
<td>263</td>
</tr>
<tr>
<td><strong>CD Information Systems Total</strong></td>
<td><strong>11,549</strong></td>
<td><strong>6,044</strong></td>
<td><strong>4,809</strong></td>
<td><strong>916</strong></td>
<td><strong>23,318</strong></td>
</tr>
</tbody>
</table>

*2018- January and February

## ColumbiaDoctors Identified Commingled Charts

<table>
<thead>
<tr>
<th>Year</th>
<th># of Commingled Charts</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>28</td>
</tr>
<tr>
<td>2018</td>
<td>4</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>32</strong></td>
</tr>
</tbody>
</table>
Duplicate and Commingled Charts

What You Need to Know

- Conduct partial name searches
- Flag/identify patients who are twins, triplets, etc.
- Do not change demographic information
  - When in doubt create a new chart
- Enter commingled charts in Healthcare SafetyZone and notify ColumbiaDoctors HIM
- For duplicate records contact NYP EMPI Team at:
  - MRNHelp@NYP.org
  - For more immediate service call 212-746-0505
New eSAF Process for CROWN Access

Background

- Confusing process/layout for eSAF submitters
  - Training determined what type of access user received
  - eSAF submitters and approvers did not line up

- CROWN reporting is based off user information collected from eSAF

- Free text fields allowed for different spelling of department names resulting in multiple departments (e.g. Orthopedic Surgery, Orthopeadic Surgery, Orthopeadics Surgery)
New eSAF Process for CROWN Access

What You Need to Know

- Option to submit CROWN access for new users, update/change users access, or reactivate users access

- Identified CROWN roles, with information about who should receive that specific type of access

- Drop down options reduce the variability of free text inconsistencies

- Reduces the time it takes for the user to receive CROWN access
  - All information needs to be included/attached prior to submitting eSAF
  - Streamlined process for eSAF approvers
Updated CROWN Support Contact

Prior State:

- Call - 212-305-4357, select option 4
  - 5HELP Medical Center Support Line
- Servicedesk@nyp.org
  - General email where all tickets are sent to

Current State:

- Call - 212-746-4357, select option 6
  - NYP Service Desk
- Email to crownsupport@nyp.org
  - Request/ticket goes specifically to CROWN Tier 1 support
Jeopardy

jeopardylabs.com/play/him-compliance.
Open Discussion

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