ColumbiaDoctors: 2018 HIM and Compliance Update

ColumbiaDoctors HIM Team
CUIMC HIPAA Privacy Office
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

Notice of Privacy Practices

Effective Date: April 2, 2018

Your Information
- Your Rights
- Our Responsibilities

Weill Cornell Medicine, NewYork-Presbyterian, and Columbia University participate in an Organized Health Care Arrangement (OHCA). This allows us to share health information to carry out treatment, payment and joint health care operations relating to the OHCA, including integrated information system management, health information exchange, financial and billing services, insurance, quality improvement, and risk management activities. Organizations that will follow this notice include Weill Cornell Medicine, NewYork-Presbyterian sites, Columbia University and their entities.

This Notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review it carefully.

This page is intended as a summary of the Notice. Please review the remainder of the Notice for more details.

Your Rights
You have the right to:
- Request a copy of your paper or electronic medical record
- Request a correction to your paper or electronic medical record
- Request confidential communications
- Ask us to limit the information we share
- Get a list of certain disclosures we have made of your information
- Get a copy of this privacy notice
- Choose someone to act for you in accordance with certain legal requirements
- File a complaint if you believe your privacy rights have been violated

Your Choices
You have some choices in the way that we use and share information as we:
- Tell family and friends about your condition
- Include you in a hospital directory
- Raise funds & Marketing Purposes

Our Uses and Disclosures
We may use and share your information as we:
- Treat you
- Run our organization
- Bill for your services
- Help with public health and safety issues
- Do research
- Comply with the law
- Respond to organ and tissue donation requests
- Work with a medical examiner or funeral director
- Address workers’ compensation, law enforcement, and other government requests
- Respond to lawsuits and legal actions
- Assist in a disaster relief effort

YOUR INFORMATION
YOUR RIGHTS
OUR RESPONSIBILITIES

This notice describes how medical information about you may be used and disclosed and how you can get access to this information. Please review it carefully.
NOTICE OF PRIVACY PRACTICES

ACKNOWLEDGEMENT OF RECEIPT

Weill Cornell Medicine, NewYork-Presbyterian, and Columbia University participate in an Organized Health Care Arrangement (OHCA). This allows us to share health information to carry out treatment, payment and joint health care operations relating to the OHCA, including integrated information system management, health information exchange, financial and billing services, insurance, quality improvement, and risk management activities. Organizations that will follow this notice include Weill Cornell Medicine, NewYork-Presbyterian sites, Columbia University and their entities.

* Standard intake form also acceptable
NOTICE OF PRIVACY PRACTICES

FAQ

ColumbiaDoctors is providing all of our patients with an updated copy of our Notice of Privacy Practices (Notice). The HIPAA Privacy Rules require that we provide our patients with a new copy of the Notice whenever it is updated. The new Notice informs our patients about our relationship with NewYork Presbyterian Hospital and Weill Cornell Medicine.

1. Why is the patient receiving the Notice again?
ColumbiaDoctors has updated our Notice of Privacy Practices.

2. Why was the Notice updated?
The Notice was updated to inform patients about our relationship with NewYork Presbyterian Hospital and Weill Cornell Medicine. Although Columbia has a longstanding relationship with these organizations, we originally provided our patients with separate Notice of Privacy Practices. After a review each of our Notices, we decided that we should assure that our patients are told about this relationship.

3. Is there anything different about the Notice?
No, the content of the Notice includes all of the requirements of the HIPAA rule, however the contact information for all three organizations has been added to the Notice.

4. What if the patient refuses to sign the Acknowledgement Form?
The HIPAA Privacy Rule requires that we provide you with a copy of our Notice of Privacy Practices. You are not required to sign the acknowledgement form, but we would like you to so that all of your other healthcare providers know that you have already received the Notice.

5. Why does ColumbiaDoctors need to share the patient’s information with NYPresbyterian Hospital?
It is important for your care that we are able to share information. For example: When you see your doctor and they order an x-ray or a blood test, these tests are done at NYPresbyterian Hospital. When the result of the tests are ready, this information must be shared with the doctor that ordered the test.

6. Who can the patient contact if they have questions?
You can contact our Privacy Officer at HIPAA@columbia.edu or 212 305-7315.
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 4/16/2018, 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 NOPP & NOPP FAQ’s

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
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

ColumbiaDoctors
The Physicians and Surgeons of Columbia University
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

- Affected April 16th, 2018
- 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
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)
  - For access contact Danielle Denaker at 212-305-9957

- Periodically validate programmed fax numbers
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
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

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
## Contacts

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<tr>
<th><strong>ColumbiaDoctors HIM</strong></th>
<th><strong>CUIMC HIPAA Privacy Office</strong></th>
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<tbody>
<tr>
<td><strong><a href="mailto:ColumbiaDoctors-HIM@cumc.columbia.edu">ColumbiaDoctors-HIM@cumc.columbia.edu</a></strong></td>
<td><strong><a href="mailto:HIPAA@cumc.columbia.edu">HIPAA@cumc.columbia.edu</a></strong></td>
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Jeopardy

Questions?