

## BAY-ARENAC BEHAVIORAL HEALTH AUTHORITY POLICIES AND PROCEDURES MANUAL

<b>Chapter: 9</b>	<b>Information Management</b>		
<b>Section: 5</b>	<b>Technology Safeguards</b>		
<b>Topic: 6</b>	<b>Access Controls –Electronic Signature and Error Corrections</b>		
Page: 1 of 4	Supersedes Date: Pol: 12-20-07 Proc: 6-27-13, 5-9-13, 12-20-07	Approval Date: Pol: 8-15-13 Proc: 2-21-2020	<hr style="width: 80%; margin: 0 auto;"/> <i>Board Chairperson Signature</i>  <hr style="width: 80%; margin: 0 auto;"/> <i>Chief Executive Officer Signature</i>
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### Policy

It is the policy of Bay-Arenac Behavioral Health Authority (BABHA) that, when needed for internal business software applications, the unique user identification assigned to individuals can be utilized and has the same legitimate authority as an actual “written” signature. BABHA also recognizes the need for a process to correct errors of fact in electronic medical records (EMR).

### Purpose

This policy and procedure was developed to establish a process for correcting errors of fact once a document is finalized in an EMR and an acceptable method for individuals utilizing the BABHA information systems to be able to use their individualized system sign-on as an electronic signature for Agency-related forms and communication acknowledgments indicating the application of a signature.

### Education Applies to:

- All BABHA Staff
- Selected BABHA Staff, as follows:
- All Contracted Providers:    Policy Only    Policy and Procedure
- Selected Contracted Providers, as follows: Primary Information Technology Vendor
  - Policy Only    Policy and Procedure
- BABHA’s Affiliates:    Policy Only    Policy and Procedure
- Other:

### Definitions

Information System: For purposes of this policy/procedure, information system refers to an interconnected set of information resources under the same direct management control that

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shares common functionality. A system normally includes hardware, software, information, data, and applications.

Workforce Member: Employees, volunteers, and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers, and staff from third party entities who provide service to the covered entity.

### Procedure

#### I. Electronic Signature

1. Once a unique user identification has been established, it will be recognized as the electronic equivalent to the workforce member's actual signature.
2. BABHA's Information Systems Department staff will apply the level of security as outlined by the workforce member's supervisor/director in accordance to the application security model.
3. Once an individual has signed onto a BABHA information system, all activity entered into the information system requiring a signature will utilize the stored sign-on as acknowledgment that the data, form, or other computerized documents have been signed.
4. The workforce member's sign-on will be accepted as if it were a handwritten signature. When applicable, the system requiring a signature will provide a warning message for the workforce member to approve the application of his/her electronic signature.
5. Once the workforce member has electronically signed a document, it will be considered as a "final document" unless the document requires another authorized signature. In that case, as soon as the required authorized signature is obtained, the document will be considered "final".

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**II. Error Corrections**

1. If an error in documentation is made, such as a wrong date, name, time, etc., and is noticed after the document has been finalized in the EMR, the author of such document may alter the finalized document by performing the change signed document function with the EMR, providing a reason for the corrective action, and resigning the changed document.
2. Staff are not allowed to delete any signed documents in the EMR. The Medical Records Associate, or designee, is the only workforce member who can change or delete a signed document in the EMR, in consultation with the BABH Corporate Compliance Officer.
3. If possible, the Medical Records Associate will have the author make the necessary change or, when necessary, complete an entirely new document. If necessary, the Medical Records Associate will then remove the old document.
4. The EMR captures a log of all system activity, including document and error corrections. The system activity log is reviewed by the Medical Records Associate on a regular basis and the Corporate Compliance Committee as needed.

**Attachments**

N/A

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**Related Forms**

N/A

**Related Materials**

N/A

**References/Legal Authority**

N/A

<b>SUBMISSION FORM</b>				
<b>AUTHOR/ REVIEWER</b>	<b>APPROVING BODY/COMMITTEE/ SUPERVISOR</b>	<b>APPROVAL/REVIEW DATE</b>	<b>ACTION (Deletion, New, No Changes, Replacement or Revision)</b>	<b>REASON FOR ACTION - If replacement list policy to be replaced</b>
M. Wolber	J. Pinter	06/27/13	Revision	Revised to update to current practices and added procedure for errors of fact corrections.
B. Kish	J. Pinter, CCO	02/10/17	No Changes	Triennial Review
B. Kish	J. Pinter, CCO	02/21/20	Revision	Triennial Review-updated Error Correction section to reflect current error correction procedures