

Sullivan County Department of Public Health

<u>Title:</u> Clinician Electronic Signature	Original Approval: 9/06
<u>Number:</u> DP-03	Reviewed/ revised:
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Statement/ Purpose:

Sullivan County Public Health Services has adopted this Electronic Signature policy to comply with legal and accreditation standards requiring authentication of medical records and the Regulation's requirement to protect the security of electronic health information, as well as our duty to protect the confidentiality and integrity of confidential medical information as required by law, professional ethics, and accreditation requirements.

Authority:

Application:

All Certified Home Health Agency (CHHA) Clinicians

Terminology:

Responsible Party:

Public Health Director

Cross-Reference:

Procedure:

1. To gain entry into the McKesson clinical documentation system and access patients' medical record information, the clinician must authenticate him or herself:
 - a. After turning on the laptop or workstation, a unique login and password specific to the clinician must be entered to gain access to the applications.
 - b. Passwords are unique to the clinicians. Clinicians may not share their login or password information and must treat it as strictly confidential. County Management Information System (MIS) provides network security through county-wide policies for all staff.
2. To further safeguard against unauthorized access to the system and forgery of electronic signatures:
 - a. The System Administrator or the Supervising Public Health Nurse overseeing McKesson, maintains the assignment of laptops, logins, passwords, and laptop numbers. Only specifically designated staff may perform those tasks under their supervision in accordance with SCPHS' security policy.
 - b. Entries onto the laptop that the clinician has electronically signed and processed cannot be altered by the clinician or other staff member.
 - c. Medical record entries that are processed can only be corrected by supervisory level staff, only in circumstances for corrections related to the OASIS, MO825, MO190, and MO230, 240 and 245, and such unlocking of the medical record is recorded in the audit trail records.
3. Sullivan County will maintain hardware, server, and network security consistent with its security policy.
4. SCPHS will train and educate staff in the proper use of the electronic signature.

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- a. All clinical staff using laptops for patient documentation, must be trained in security and protection of confidential data.

Support and Administrative Staff Access and Training.

- Only specific clinical staff has access rights to make an electronic signature entry into a secured area of a patient medical record. Support staff and administrative staff logins do not permit them access to entering or altering electronic signatures on patient clinical data in the system.
- Support and administrative staff are also required to receive training in and review of the Network Security Policy to ensure patient confidentiality on the workstations.

Enforcement:

All employees are responsible for reporting problems with data integrity to their supervisor.

All supervisors are responsible for enforcing this policy. Employees who violate this policy are subject to discipline up to and including termination from employment in accordance with SCPHS' Disciplinary Policy.

Reconstruction of record:

Sullivan County regularly backs up all files several times daily and records can be easily reconstructed from the backed-up data (see county's MIS policies).

In accordance with legal and accreditation standards, the Sullivan County Public Health Services (SCPHS) permits clinicians to authenticate entries by executing an electronic signature.

The clinician creating a note with a unique ID and password in the McKesson clinical documentation system, is considered to have signed and authenticated that specified information entered into the McKesson system as a part of the patient's legal medical record. SCPHS provides the clinical staff training and orientation on the use of the electronic signature as a required part of training on the automated homecare record.

Clinical staff, by locking the note, are attesting to have reviewed the contents of that entry and having determined that the entry contains what the individual clinician intended. Once the note is processed, the system tracks, edits, and maintains the note in original form.