TITLE: IN-ERROR POLICY	
STATUS: FINAL	EFFECTIVE DATE: 05/03/2023
VERSION: 9	PAGE: 1 OF 3

I. PURPOSE

It is the policy of ClinicalConnect HIE (CCHIE) to maintain the integrity of patient information through a standardized process of error handling. This policy addresses information sent to CCHIE in error as well as information received from CCHIE's services in error. Furthermore, this policy applies to all production and non-production environments.

II. SCOPE

This process applies to CCHIE Employees and its Participants.

III. CONNECTCHART IN-ERROR POLICY

A. Participants shall notify CCHIE upon the discovery of a patient record, sensitive information, or other information sent to CCHIE's ConnectChart Service in error.

B. If patient information was comingled, Participants shall re-send corrected information to CCHIE's ConnectChart Service for the information previously sent in error to appear on the correct patient record. This shall be done without delay to mitigate any instance of information blocking as defined in 45 CFR 171.103.

C. If it can be determined that a clinician had not accessed the information sent in error, such information may be deleted.

D. If it is confirmed that a clinician had accessed the information sent in error or it cannot be determined that a clinician had not accessed the information sent in error, then such information shall not be deleted. The Participant shall coordinate with CCHIE to label the information as "in error" or the like. If not technically feasible to do so, CCHIE may take reasonable steps to prevent the information from further access provided that an audit trail is maintained.

IV. CONNECTALERT & CONNECTQUALITY IN-ERROR POLICY

A. As a requirement before going live with CCHIE's ConnectAlert and ConnectQuality Services, Participants must have implemented an in-error procedure to manage information received in error. Participants shall maintain and update such procedure(s) as needed.

B. Furthermore, Participants are responsible for the accuracy of their patient/member panels to prevent receiving information in error.

C. If information is received in error through CCHIE's ConnectAlert and/or ConnectQuality Service, Participants must timely delete such information or otherwise follow their in-error procedure(s).

D. If assistance is needed, Participants may engage the CCHIE Support Team to assist with any investigation.

E. Regarding information received in error for properly subscribed patients/members due to circumstances beyond CCHIE's control, Participants may elect to unsubscribe to such patients/members to prevent receiving further information in error. Regardless, CCHIE shall not require Participants to unsubscribe to properly subscribed patients/members.

V. Revision History

DATE	AUTHOR	COMMENTS
08/29/2016	Erika Jones	Creation of the process.
06/07/2019	Keith Dukes	Changed "Guidelines" to "Policy", changed "staff" to "employees" and updated format.
06/29/2020	Keith Dukes	Reviewed – No Changes
07/21/2021	Keith Dukes	Broadened verbiage to include remediating ePHI or other data sent in error to all CCHIE Services.
08/16/2022	Keith Dukes	- Updated the purpose to include data received from CCHIE in error. - Updated section A to include notifications sent from CCHIE and data received from CCHIE in error. - Updated section B to reference information blocking. - Removed section C. - Updated section D (previously E) noting that those remedial tasks regarding data received in error from CCHIE.
12/02/2022	Keith Dukes	Added section E to address commingled patient information in which there is no technical means to correct
05/01/2023	Keith Dukes	Re-drafted In-Error Policy to accommodate both the ConnectChart and ConnectAlert services.
05/02/2023	Keith Dukes & Laura Mosesso	Finalized revised draft.

05/02/2023	Phyllis Szymanski	Approved revised policy with added clarification that the policy applies to all environments.