

TITLE: IN-ERROR POLICY	
STATUS: FINAL	EFFECTIVE DATE: August 16, 2022
VERSION: 5	PAGE: 1 OF 2

I. PURPOSE

It is the policy of ClinicalConnect HIE (CCHIE) to maintain the integrity of patient information through a standardized process of error correction. This policy includes all data sent to CCHIE as well as all data received from CCHIE.

II. SCOPE

This process applies to CCHIE employees and its Participants.

III. POLICY

- A. A Participant shall notify CCHIE or CCHIE shall notify a Participant upon the discovery of a patient record or sensitive patient information which was either sent to CCHIE or received from CCHIE in error.
- B. If necessary, a Participant shall timely re-send corrected record(s) to CCHIE to resolve outstanding data quality and/or patient privacy issues in addition to mitigating instances of information blocking (*if applicable*) as defined in 45 CFR 171.103.
- C. If the patient record has been accessed for clinical purposes after being sent in error, then the record shall not be deleted.
 - 1. If technically feasible, the Participant will send the corrected record to allow for versioning.
 - 2. If it is not technically feasible to version, then the Participant will send the corrected patient record with a statement at the top of the document stating this document supersedes the in-errored document.
- D. Regardless of fault, the Participant must assist CCHIE with all post-remediation tasks regarding data received in error from CCHIE. Such tasks include but are not limited to the following:
 - 1. Disclosure report requests;
 - 2. Audit reports;

3. Breach analysis;

4. Etc.

IV. 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	<ul style="list-style-type: none"> • 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.