CHAPTER Information Management	CHAPTER 07	SECTION 002	SUBJECT 25
SECTION Data Management	DESCRIPTION Community Electronic Health Records (CEHR)		
WRITTEN BY Lauren Emmons, ACSW COO	REVISED BY Sandy Koyl, BHSA IT and Data Management Supervisor	AUTHORIZED BY Brooke Sankiewicz, LMSW, CADC CEO	

APPLICATION:

☒CMH Staff	☐Board Members	☐Provider Network	☒Employment Services Providers
☐Employment Services Provider Agencies	☒Independent Contractors	☒Students	☒Interns
☒Volunteers	☒Persons Served		

POLICY:

Lapeer County Community Mental Health (LCCMH) provides persons served and/or their guardians the opportunity to enroll in a secure, confidential, and easy-to-use website that gives individuals 24-hour access to elements of their health records through Community Electronic Health Records (CEHR).

STANDARDS:

A. Persons served can view their portal accounts anywhere Internet access is available. Persons served can review parts of their medical records, send a message to their case holder, access important health information, view their medication lists, obtain educational information, and maintain account information.

B. Providing individual access to electronic health records must be compliant with HIPAA, demonstrate improved quality of care, and administrative efficiencies, and allow access to personal health information.

C. Individuals are able to send a message to any staff assigned to their case in the Optimal Alliance Software Information System (OASIS). Staff are able to send a message to any person served on their caseload. Messages are sent and received through the staff's in-box (secure messaging) in OASIS.

D. Persons served are advised the portal is not appropriate for communicating urgent medical issues or anything requiring immediate attention.

E. There is no direct communication regarding clinical information to an external email address.

F. Utilizing CEHR allows for a method of viewing information preventing unauthorized parties from being able to access or see specific information. Persons served are responsible for ensuring their passwords are not shared and should not permit others access to their personal health information.

G. Information in CEHR is updated in "real-time" so there is no wait to see updated information.

PROCEDURES:

A. Primary Case Holders or Support Staff

    1. Assign (when requested) to individuals 18 years of age or older, a login (PIN), when deemed clinically appropriate. Staff will print out and provide instructions for creating an account (user ID) with a secure password.

    2. In the process of creating an account, persons served must read the Terms of Use and "Agree" to the terms before any access is allowed.

    3. Explains to persons served CEHR is a secure website and is an optional service. Individual access can be withheld, suspended, or terminated at any time and for any reason. If access is suspended or terminated the

person served will receive notification promptly (within 7 days) from their primary case holder.

4. Assists persons served who receive a PIN. Persons served who log in to CEHR using their User ID and secure password should ensure their personal information regarding contact and emergency numbers is accurate. If any information is found to be inaccurate, persons served are instructed to contact their primary case holder for updating either through sending a message in CEHR, by phone or by face-to-face contact.

5. Explains to persons served through CEHR, that they have the opportunity to view parts of their health information, manage their account, and enter requests (ex. needing an appointment and the ability to electronically sign documentation).

6. Explains to persons served CEHR is not intended for emergency purposes and any crisis or emergency medical situation should be handled through the standard procedures (After hour crisis line, 911, etc.).

7. Explains to persons served who request access to CEHR that LCCMH is not liable for the security to access CEHR.

8. Monitors individual PIN assignments and notifies their supervisor if a person served may require suspension or termination of CEHR individual access due to potential of harm. If a clinician or prescriber believes substantial harm may arise from the disclosure of particular information, access to CEHR can be denied or suspended at any time.

DEFINITIONS:

Portal: A secure website where specific health information about a person served is stored and is available for the person served to securely view. Access is controlled, PIN numbers are assigned, and a secure password must be chosen to complete access.

CHAPTER Information Management	CHAPTER 07	SECTION 002	SUBJECT 25
SECTION Data Management		DESCRIPTION Community Electronic Health Records (CEHR)	

This tool can benefit persons served and providers by enhancing access for persons served and increasing administrative efficiency and productivity.

Protected Health Information (PHI): Individually identifiable health information (1)(i) transmitted by electronic media; (ii) maintained in any medium described in the definition of electronic media or (iii) transmitted or maintained in any other form or medium. (2) Excludes individually identifiable health information in (2)(i) Education records covered by the Family Educational Right and Privacy Act, as amended 20 U.S.C. 1232g; and (ii) records described at 20 U.S.C. 1232g(a)(4)(B)(iv).

OASIS: Optimal Alliance Software Information System – the certified electronic health record utilized by the LCCMH and contract providers.

SK:lr