

Department: Health Information Management (HIM)

Policy Number: HHS-4111-HIM **Attachments:** _____

Policy Title: RPMS Electronic Health Record Business Rules

Date: 12/12 **Revised:** _____

Approved by:  **Date:** 3/13/13

Policy Statement:

Mille Lacs Band Health Services recognize the importance of establishing policy and procedures concerning the Authorization Subscription Utility (ASU) Business Rules for Health Information (HIM) professionals, Information Technology (IT) support, and Clinical Application Coordinators (CACs) in order to:

- Understand the purposes and uses of document business rules in Text Integration Utility (TIU) software
- Enable HIM to review and critique current and emerging TIU document business rules, understand ASU/business rules and their relationship to TIU documents and User Classes
- Understand and apply the TIU Document Definitions Hierarchy's relationship to document business rules and the difference between User Class and User Role, and practice simple troubleshooting techniques

POLICY:

Health Care Facilities must establish both policies and business rules that pertain to document creation, authentication, retention, etc.

PROCEDURE:

Electronic Environment In an electronic environment, document creation and maintenance are required to be managed by electronic means. Business rules are created to implement many different policies. Examples of policies pertaining to clinical documents that may require the creation of business rules include:

- Who can author specific clinical documents?
- Who can sign /co-sign documents?
- Who can edit a document and when?
- Who can view a document?

RESPONSIBILITIES:

HIM staff must review the facility's current business rules to assure that the business rules accurately carry out MBLHS policies, especially in relation to clinical documents and to overall clinical privileges. HIM staff should provide significant HIM technical input into the creation of new business rules pertaining to any aspect of HIM practice, as it pertains to management of health information. Annual review of document business rules is recommended as well as working with the CAC when new RPMS EHR patches import document business rules.

What this Document Addresses. This document addresses business rules for ASU for documents only. Business rules are created to manage many different electronic functions, not just document creation and maintenance. ASU may define who has permission to enter and sign an order.

DEFINITIONS

Business Rule: implements a policy or policies and is usually written as prescribed statements as a computer procedure, sets of conditions or formulas. Business rules are useful in defining what roles certain groups or individuals are allowed to perform.

Authorization Subscription Utility (ASU): VistA software that implements a User Class Hierarchy that can be used by HIM, IT, and CACs to:

- Identify roles that different users perform within their facility. *Note: ASU accomplishes role identity by defining and populating a User Class Hierarchy.*
- Specify business rules for managing documents by members of these User Classes/User Roles. These business rules link User Classes/User Roles to document events in Text Integrated Utilities (TIU); i.e., who can sign, co-sign, view and amend documents.

Text Integrated Utilities (TIU) is a RPMS EHR software package that uses a document storage hierarchy database called TIU Document Definitions to standardize the way clinical documents are managed in the electronic health record. This hierarchy provides the building blocks for TIU by permitting titles to inherit characteristics, business rule(s) and parameters from the higher level of Class and Document Class. It assists clinicians and management in searching for and retrieving clinical documents. TIU interfaces with other software applications including Health Summary, Problem List, Patient Care Encounter/Visit Tracking, Incomplete Record Tracking and RPMS.

Document Definitions Hierarchy is a TIU document storage database that provides the building blocks for TIU. As new software and document requirements are developed for the electronic health record, the hierarchy may expand to meet the specified management requirements. The ranking, from highest to lowest level is as follows:

1. Class is the first and highest level and includes the Progress Note, Addendum, Laboratory Reports and Clinical Procedures. These types of documents reside under the highest Class called Clinical Documents in the TIU Hierarchy and are expanded to support new functionality requirements for document management.
2. Document Classes are the second level and are set up below "Class" of documents to further manage or organize document characteristics. Document Classes allow a site to apply characteristics to documents that would not be desirable at a Class level.

3. Document Titles are the third level and inherit characteristics, including ASU Document business rules/parameters, from higher-level documents in the “Class” and “Document Classes.” Examples of characteristics include who has the right to print, view, sign, co-sign, and delete documents.
4. Components are blocks of text that may be reused in an unlimited number of titles. A common set of components is the familiar SOAP (Subject, Objective, Assessment, Plan) note. Components are used with Boilerplate text templates. As Boilerplate text templates are replaced with new RPMS EHR point & click template functionality, there is less of a need for components.

Status. Status refers to the event that is being authorized in the document business rule. Examples: amended, completed, retracted, unsigned, un-cosigned, unverified, etc. As new software and document requirements are developed for the electronic health record, the status may expand to meet the specified document management requirements. For example, the status of retracted was newly released in response to a need to better manage electronic erroneous document entries.

Action. An action is the rule that governs what is permitted for a given document type/status.

Examples:

- Change title, co-sign, delete record, identify signers, print record, etc.
- As new software and document requirements are developed for the electronic health record, the action may expand to meet the specified document management requirements.
- The action of reassign was newly released in response to a need to better manage electronic erroneous document entries.

User Class. A User Class is a set of users that are defined before a document is created in TIU. Like TIU and Document Hierarchy, ASU consists of a hierarchy of User Classes. The same rule applies: the lowest level inherits characteristics from the highest level of User Classes. It is important to learn and understand all of the User Classes in the hierarchy that fall under specific classes.

Examples:

- Under Provider--Attending Physician, Resident, and Physician Assistant, which inherit Provider characteristics if applied to business rules.
- Chief MIS, Nurse, and Clinical Application Coordinator fall outside Provider User Class so do not inherit its characteristics.
- When a User Class is not specified for an individual who has RPMS access the computer automatically assigns a default User Class of User. This does not display when looking up the individual's User Class. What displays is “no Class Memberships found for Doe, John. These individuals can still enter and sign notes if not limited by further Business Rules.
- An individual may also have multiple User Classes defined depending on their documentation needs.
- Document Business Rules would need to support signature requirements.

Caution: When reviewing or writing a document business rule, it is critical to assure that it agrees with credentialing policies. If document business rules give authority to Chief, MIS (Holder of MIS key) to delete, reassign and process erroneous entries, be sure to monitor who is assigned this User Class. Appropriate oversight of Users Classes is critical to maintaining the integrity of the electronic health record.

User Role. With the exception of the Attending role, a User Role is a function that is defined at the time the document is being created in TIU. Many people are identified as belonging to a User Class; only one person, however, is identified in a User Role. Examples:

- Additional signer, author/dictator, expected co-signer, expected signer, surrogate or transcriber.

User Roles assist User Classes in document business rules when a site wants to strengthen the application of a specific rule.

When Are Document Business Rules Needed?

Document business rules are needed in an electronic environment throughout the life cycle of document creation through document completion. Business rules assure policies are implemented appropriately in an electronic environment. One of the first policies needed is a statement of who is authorized to document in the health record. Once this is established, business rules need to be written that clearly articulate who has the right to do what to a document.

An excellent way to begin understanding when document business rules are needed is to review ASU Document Business Rules and TIU Document Parameters. Documents are occasionally entered for the wrong patient or sometimes the information within the document(s) may be incorrect or erroneous. It is strongly recommended that local procedures and ASU document business rules be established for correcting erroneous patient information entered electronically. RPMS EHR for HIM User Manual states that no one may edit any signed document in the status of completed, un-cosigned, amended and retracted mandated sites to identify and correct inappropriate document business rules that allow editing of signed documents.

Review ASU Document Business Rule by using the TIU Menu TIUB and TIU Document Definitions Menu TIU Document Parameters. The TIUB Menu report lists all document business rules in an easy-to-read format. HIM professionals must monitor and review document business rules to make sure they are in compliance with policies, rules and regulations. The TIU Document Parameters Menu also has settings to assist in managing documents.

When reviewing document business rules and parameter settings consider the following:

- Who can **make entries** in RPMS EHR documents? Are users restricted to certain titles?

- Who can **view** documents? Who has the **need to know** the information?
- Who can **print** the chart copy vs. a working copy of documents, if printing electronic documents is permissible at all?
- Who can **edit** documents if other than through making an addendum?
- At what point in the document life cycle can **edits** be done?
- Who can **amend** a document? HIM Director and/or HIPAA Privacy Official?
- Others

Scenarios:

There are several typical scenarios of document problems that require HIM intervention and involve business rules: retract or re-assign documents and change a title on a document. There are other scenarios in which HIM input into business rules is required. This section describes examples of business rules and required elements that have already been created.

Hint: Before taking action on document problems, first understand the business rules and required elements for each type of action.

Action 1: RETRACTION OF A DOCUMENT or ADDENDUM

Note: CD means Clinical Document, which is the highest Class of documents in the TIU Hierarchy

Business Rules

- A COMPLETE CD can be DELETE RECORD by CHIEF, MIS
- A RETRACTED CD can be VIEW by CHIEF, MIS
- A RETRACTED CD can be PRINT RECORD by CHIEF, MIS

Elements

- Document Definition = Clinical Document (CD)
- Document Statuses = Complete, Retracted
- Document Actions = Delete, View, Print
- User Class = Chief, MIS
- User Role = None

Action 2: REASSIGNMENT OF A DOCUMENT or ADDENDUM

Business Rule

- A COMPLETE CD can be REASSIGN by CHIEF, MIS

Elements

- Document Definition = Clinical Document (CD)
- Document Status = Complete
- Document Action = Reassign
- User Class = Chief, MIS
- User Role = None

Action 3: CHANGE A TITLE FOR A DOCUMENT

Business Rule

- A COMPLETE CD can be CHANGE TITLE by CHIEF, MIS

Elements

- Document Definition = Clinical Document (CD)
- Document Status = Complete
- Document Actions = Delete, View, Print
- User Class = Chief, MIS
- User Role = None

HIM TROUBLESHOOTING TECHNIQUES

The following are suggested techniques to use when these typical problems arise:

SCENARIO #1: “I can’t sign my note.”

1. Identify the caller. He says he is an attending physician. Ask yourself – Is this person in the correct User Class?
2. Ask if he can locate his document in RPMS EHR so you can verify it was done. Ask him to read you the message he receives when trying to sign his note.

Note: The TIU/RPMS error message helps you pin point exactly what is the problem. RPMS EHR List Manager doesn’t display the error messages and gives the wrong impression that there is no document, when, in reality, there is a document with an error message.

3. Ask him to read you the message. Note: The error message in RPMS EHR will help you break apart the problem. For example, this error message says: “You may not co-sign this un-cosigned operative report”.

ASU Business Rule states, An **UNCOSIGNED** Operative Report may be **CO-SIGNED** by **A PROVIDER** who is also an **EXPECTED COSIGNER**.

4. Ask yourself these questions when determining what the problem is:
 - What is the status of the document?
 - i. Un-cosigned
 - What is the action of the document?
 - ii. Co-signature
 - What is their User Class in User Class Management?
 - iii. None, **they are not assigned a User Class**

Possible Solution: You check with the Credentialing Officer at your site and find that you can give the attending physician the User Class of Attending Physician, which falls under Provider User Class, which is in your document business rule.

If you want to restrict your rule further, you could change the document business rule to only allow a Physician User Class to co-sign the operative report. Provider User class includes roles other than physicians and may be too broad to cover specific types of documents.

ATTACHMENTS: **ATTACHMENT A**

User Roles

Many people can belong to a User Class but only one person is identified in a User Role.

Who is in a User Class is defined before a document is created but who is in a User Role is defined at the time the document itself is created. There is one exception. The Surrogate role can be defined prior to the creation of a document or prior to actual signing of a document.

The following roles identify how a single user can interact with a document. This role is defined when the document is created. The following list defines TIU User Roles that are applied to ASU document business rules. User Role and User Class may be used in document business rules to support local document management.

Additional Signer	The information is stored in the TIU MULTIPLE SIGNATURE File.
Attending Physician	The information is stored in the TIU DOCUMENT File in the ATTENDING PHYSICIAN field.
Author/Dictator	The information is stored in the TIU DOCUMENT File in the AUTHOR/DICTATOR field.
Expected Cosigner	The information is stored in the TIU DOCUMENT File in the EXPECTED COSIGNER field.
Expected Signer	The information is stored in the TIU DOCUMENT File in the EXPECTED SIGNER field.
Surrogate	The information is stored in the NEW PERSON File. The Software checks to see if a user has identified a Surrogate.

ATTACHMENT B

Using Protocols and Remote Procedures, RPMS EHR GUI and RPMS List Manager performs actions on TIU documents. These calls execute code in TIU and ASU. The following is an example:

1997 ASU Exported Business Rules

Note: HIM personnel may want to know what Business Rules TIU were exported in 1997; therefore, they have been included as a reference.

**List Business Rules by DOCUMENT DEFINITION
for CLASS CLINICAL DOCUMENTS**

64 Rules

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- 1 An UNTRANSCRIBED (CLASS) CLINICAL DOCUMENT may be ENTERED by A USER
 - 2 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be RELEASED by A TRANSCRIBER
 - 3 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by An AUTHOR/DICTATOR
 - 4 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by An EXPECTED SIGNER
 - 5 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be SIGNED by An EXPECTED SIGNER
 - 6 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be SIGNED by A PROVIDER who is also An EXPECTED COSIGNER
 - 7 A COMPLETED (CLASS) CLINICAL DOCUMENT may be VIEWED by A USER
 - 8 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be EDITED by A TRANSCRIBER
 - 9 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be EDITED by A TRANSCRIPTIONIST
 - 10 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be COSIGNED by An EXPECTED COSIGNER
 - 11 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be SIGNED by A STUDENT who is also An EXPECTED SIGNER
 - 12 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by An EXPECTED COSIGNER
 - 13 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by An EXPECTED COSIGNER
 - 14 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
 - 15 An UNDICTATED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
 - 16 An UNTRANSCRIBED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
 - 17 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
 - 18 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS

- 19 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
- 20 A COMPLETED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
- 21 An AMENDED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
- 22 A COMPLETED (CLASS) CLINICAL DOCUMENT may be PRINTED by A USER
- 23 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be VIEWED by An EXPECTED COSIGNER
- 24 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by A CLINICAL SERVICE CHIEF
- 25 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be EDITED by A CLINICAL SERVICE CHIEF
- 26 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be SIGNED by An ADDITIONAL SIGNER
- 27 A COMPLETED (CLASS) CLINICAL DOCUMENT may be SIGNED by An ADDITIONAL SIGNER
- 28 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be SIGNED by An ADDITIONAL SIGNER
- 29 An AMENDED (CLASS) CLINICAL DOCUMENT may be VIEWED by A USER
- 30 An AMENDED (CLASS) CLINICAL DOCUMENT may be PRINTED by A USER
- 31 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be COPIED by An AUTHOR/DICTATOR
- 32 A COMPLETED (CLASS) CLINICAL DOCUMENT may be COPIED by A USER
- 33 A DELETED (CLASS) CLINICAL DOCUMENT may be DELETED by A CLINICAL COORDINATOR
- 34 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be SENT BACK by A MEDICAL INFORMATION SECTION
- 35 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be SENT BACK by A MEDICAL INFORMATION SECTION
- 36 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be VIEWED by An EXPECTED COSIGNER
- 37 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be VIEWED by A CLINICAL SERVICE CHIEF
- 38 A COMPLETED (CLASS) CLINICAL DOCUMENT may be AMENDED by A CHIEF, MIS
- 39 A COMPLETED (CLASS) CLINICAL DOCUMENT may be ADDENDED by A USER
- 40 An AMENDED (CLASS) CLINICAL DOCUMENT may be ADDENDED by A USER
- 41 A DELETED (CLASS) CLINICAL DOCUMENT may be VIEWED by A USER
- 42 A DELETED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS
- 43 A PURGED (CLASS) CLINICAL DOCUMENT may be DELETED by A CHIEF, MIS

- 44 A PURGED (CLASS) CLINICAL DOCUMENT may be VIEWED by A USER
- 45 An UNTRANSCRIBED (CLASS) CLINICAL DOCUMENT may be VIEWED by A CHIEF, MIS
- 46 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be VIEWED by A CHIEF, MIS
- 47 An UNDICTATED (CLASS) CLINICAL DOCUMENT may be VIEWED by A USER
- 48 A COMPLETED (CLASS) CLINICAL DOCUMENT may be IDENTIFIED FOR SIGNATURE by An AUTHOR/DICTATOR
- 49 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be IDENTIFIED FOR SIGNATURE by An AUTHOR/DICTATOR
- 50 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may be IDENTIFIED FOR SIGNATURE by An EXPECTED COSIGNER
- 51 A COMPLETED (CLASS) CLINICAL DOCUMENT may be IDENTIFIED FOR SIGNATURE by An EXPECTED COSIGNER
- 52 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be REASSIGNED by A MEDICAL INFORMATION SECTION
- 53 An UNSIGNED (CLASS) CLINICAL DOCUMENT may be REASSIGNED by An AUTHOR/DICTATOR
- 54 An UNSIGNED (CLASS) CLINICAL DOCUMENT may HAVE ITS TITLE CHANGED by An AUTHOR/DICTATOR
- 55 A COMPLETED (CLASS) CLINICAL DOCUMENT may HAVE ITS TITLE CHANGED by A CHIEF, MIS
- 56 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may HAVE ITS TITLE CHANGED by An EXPECTED COSIGNER
- 57 An UNCOSIGNED (CLASS) CLINICAL DOCUMENT may HAVE ITS TITLE CHANGED by A CLINICAL SERVICE CHIEF
- 58 A COMPLETED (CLASS) CLINICAL DOCUMENT may be REASSIGNED by A CHIEF, MIS
- 59 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be VIEWED by A MEDICAL INFORMATION SECTION
- 60 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be VERIFIED by A MEDICAL INFORMATION SECTION
- 61 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be EDITED by A MEDICAL INFORMATION SECTION
- 62 An UNVERIFIED (CLASS) CLINICAL DOCUMENT may be PRINTED by A MEDICAL INFORMATION SECTION
- 63 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be VIEWED by A TRANSCRIBER
- 64 An UNRELEASED (CLASS) CLINICAL DOCUMENT may be VIEWED by A TRANSCRIPTIONIST

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- 1 A COMPLETED (CLASS) PROGRESS NOTE may be VIEWED by A USER
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REFERENCES:

RECISSION:

DISTRIBUTION: All Staff