

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

<b>Policy: BCP EP 7.2 EHR Cloning (Copy and Paste) Functions</b>	<b>Effective Date:</b> July 15, 2010
	<b>Last Revision Date:</b> October 25, 2023
<b>References:</b> N/A	

### **Policy Statement**

This policy sets standards for the appropriate use of the cloning/copy and paste/copy forward functions within an Electronic Health Record (EHR) for documentation and billing purposes.

### **Scope**

This policy applies to:

- All EHR systems licensed by Texas Tech University Health Sciences Center El Paso (TTUHSC El Paso); and
- All TTUHSC El Paso faculty, residents, staff, and students who document health care items or services in an EHR system (i.e., affiliated hospital, V.A.) as part of providing services on behalf of TTUHSC El Paso.

### **Policy**

Information within an EHR shall only be cloned in accordance with the procedures outlined in this policy. Any cloned information in the EHR that does not comply with this policy shall not be used by TTUHSC El Paso for billing purposes.

### **DEFINITIONS**

For purposes of this policy, these terms have the following meaning:

1. Cloned documentation refers to medical record documentation that has been cut and pasted from another source location and, consequently, may or may not accurately reflect information specific to the individual patient encounter once it is completed in its cloned location. One or more of the following functions may be used within an EHR to clone: (a) copy & paste; (b) copy forward; (c) save note as template; (d) or any other function that allows an individual to copy information from one patient visit note to the current visit date for either the same or different patient.
2. Provider includes Physician, Advance Practice Nurse, Certified Nurse Midwife, Physician's Assistant, Psychologist, Audiologist, Licensed Clinical Social Worker, and any other health care professional licensed and credentialed by TTUHSC El Paso to provide and bill for health care items or services.
3. Resident includes any individual enrolled in an approved Graduate Medical Education Program at the TTUHSC El Paso Paul L. Foster School of Medicine (PLFSOM) Resident.

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

4. Student, including graduate students, includes any individual enrolled in an approved program of study at TTUHSC El Paso or other accredited health sciences school.
5. Demographic information includes patient name, medical record number, unique identifying number (i.e., social security number), provider name, patient address, and contact information.

### PROCEDURE

1. Identification of Entries and Cloning
  - a. All entries into the TTUHSC El Paso EHR record should identify the entry's author by name and professional credentials.
  - b. Cloned information should be identifiable within the TTUHSC El Paso EHR system or through an audit trail, including the identification of the author of the cloned information, the source of the cloned information, and the date of the cloned information. The provider is responsible for cloning the information, as allowed under this policy, to update the cloned information to reflect the patient's status related to the current visit.
2. Cloning Prohibited between Different Patient Records  
Medical record information shall not be cloned from one patient's medical record to another in any TTUHSC El Paso EHR system.
3. Psychotherapy Visits
  - a. Documentation of information in the EHR related to psychotherapy visits (excluding psychotherapy notes and patient demographic information) shall only be entered by the individual providing the service.
  - b. Psychotherapy visit information (excluding demographic information) shall not be cloned from one visit to the next.
4. Evaluation and Management (E/M) Visits
  - a. The provider may clone relevant portions of the patient's previous visit note entered by the same provider or SOM resident in that provider's Department to the extent it represents the level of work performed during the current visit. It is revised to reflect any changes in the information. In such cases, the provider's signature shall serve as his/her attestation that the information is accurate and that any cloned information is current and represents the provider's services for that date of service.

## Texas Tech University Health Sciences Center El Paso Institutional Compliance Policy

- b. A student's or SOP resident's documentation of History of Present Illness (HPI), Exam, or Plan/Assessment shall not be cloned by the provider or SOM resident to document the visit.
- c. Cloned information from the Review of Systems (ROS) must be verified and confirmed as accurate by the billing provider. It shall only be counted for billing purposes to the extent the cloned ROS is medically necessary for that visit. Any ROS element that conflicts with the HPI or Chief Complaint (CC) portion of the visit note shall not be used or counted for billing purposes.
- d. information from other portions of the History (i.e., Medications List, Past Medical, Family & Social History) must be reviewed by the billing provider and shall only be counted for billing purposes to the extent medically necessary for that visit. Any other History portion that conflicts with the HPI, CC, or other portions of the medical record shall not be used or counted for billing purposes
- e. Providers and Residents shall receive a copy of this policy as part of EHR training. The Billing Compliance Unit Manager shall notify EHR trainers of these requirements and provide them with information on where to obtain a copy of this policy to distribute.

### **Administration and Interpretation, Revisions, or Termination**

Questions regarding this policy may be addressed to the TTUHSC El Paso Institutional Compliance Officer or the Billing Compliance Unit Manager.

### **Frequency of Review**

This Policy shall be reviewed no later than November each odd-numbered year.

**Review Date:** June 2018, March 2019, October 25, 2023

**Revision Date:** June 2018, March 2019, October 25, 2023