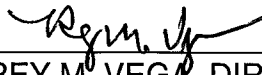


Guam Behavioral Health and Wellness Center		
TITLE: Mechanisms to Authenticate Entries in the Medical Record	REFERENCE #: MR-04	PAGE: 1
DIVISION: Inpatient/Outpatient- Medical Records	CMS: 482.24(c)(1) TJC: RC.01.02.01	
APPROVED BY:  REY M. VEGA, DIRECTOR	EFFECTIVE: 8/11/2013	
	REVISED:	

PURPOSE:

- A. The purpose of this policy is to prevent unauthorized people from accessing data or using another person's identity to sign documents.

DEFINITIONS:

1. **Authentication:** Identification of the author of a medical record entry by that author and confirmation that the contents are what the author intended.
 - a. The aim is to prevent unauthorized people from using another person's identity to sign documents.
 - b. Entries may be authenticated by an electronic signature, signature stamp, or computer key in accordance with the Stamp Signatures and Initials for Identification Policy and Procedure (MR-26).
2. **Non-repudiation:** To prevent the signer from denying that he or she signed the document.
3. **Signature:** Identifies the author or responsible person who takes ownership of and attests to the information contained in the entry.
4. **Misused:** The user has allowed another person or persons to use his/her personally assigned identifier, or that the identifier has otherwise been inappropriately used.

POLICY:

- A. This policy applies to GBHWC in its' entirety, including all workforce members. Further, the policy applies to all systems, networks, and applications, as well as all facilities (i.e., satellite offices, residential group homes, etc.) which processes, stores and/or transmits protected health information (PHI).
- B. Failure to comply with this and any other security policy will result in disciplinary action in accordance with Government of Guam Policy.
 - a. Legal action may also be taken for violations of applicable regulations and laws such as the Health Insurance Portability and Accountability Act (HIPAA).
- C. All entries into the medical record shall be authenticated by the individual who made the entry.
 - a. GBHWC employees are prohibited from authenticating an entry for another individual.

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- D. Written signature, initials, electronic signatures or computer-generated signature codes are acceptable forms of authentication.
- E. All signatures or initials, whether written, electronic, or computer-generated, shall include the initials of the signer's credentials.
- F. Entries shall be authenticated as soon as the entry is recorded.
 - a. If the entry is a verbal order (i.e., medication order, etc.) it must be countersigned within the Center's established timeframes.
- G. Countersignatures or dual signatures must meet the same requirements outlined in this policy.
- H. Electronic signatures must meet standards for:
 - a. *Data integrity* to protect data from accidental or unauthorized change.
 - i. For example: "Locking" of the entry so that once signed no further untracked changes can be made to the entry.
 - b. *Authentication* to validate the correctness of the information and confirm the identity of the signer.
 - i. For example: Requiring signer to authenticate with password or other mechanism.
 - c. *Non-repudiation* to prevent the signer from denying that he or she signed the document.

PROCEDURE:

- A. Entries are authenticated by a signature (written or electronic).
 - a. At a minimum, the signature must include the full name (first and last name) and the initials of the credentials of the author.
 - b. The date and time the author signs shall also be recorded.
- B. Each report generated by a user shall be separately authenticated.

INITIALS

- A. Initials may be used to authenticate entries on flow sheets.
 - a. There shall be a corresponding full identification of the initials on the same document or on the GBHWC Clinical Staff Signature/Initial Legend (F-MR-03) in the chart.
- B. Initials shall still include the initials of the signer's credentials.
- C. Initials should never be used where a signature is required by law.

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MULTIPLE SECTION DOCUMENTS

- A. Documents with multiple sections or completed by multiple individuals should include a signature area on the document for all applicable staff to sign, date, and time.
 - a. Staffs who have completed a certain section(s) of a form should either indicate the section(s) they completed at the signature line or initial the section(s) they completed.
 - b. The date and time recorded should reflect the time the staff completed their section(s), not the time the form was completed in its' entirety.

ELECTRONIC SIGNATURES

- A. Prior to staff using an electronic signature, the GBHWC Electronic Signature Authorization/Confidentiality Form (F-MR-09) shall be completed by the staff member and submitted to the staff's direct supervisor.
 - a. The direct supervisor is responsible for reviewing and submitting the form to the clinical administrator.
- B. The Center shall indicate in writing that each electronic signature identifier is to be kept strictly confidential.
 - a. This certification shall include a commitment to terminate a user's use of a particular identifier if it is found that the identifier has been misused.
 - b. The user shall certify in writing that he or she is the only person with user access to the identifier and the only person authorized to use the signature code.
- C. The completed GBHWC Electronic Signature Authorization/Confidentiality Form (F-MR-09) shall be filed as follows:
 - a. Original: In personnel folder with human resources
 - b. Copy: Medical Records Office
 - c. Copy: MIS Office
- D. Electronic signatures may only be affixed by that individual whose name is being affixed to the document and no other individual.
- E. Staff shall not share electronic signature identifiers with anyone.

REFERENCES:

1. Stamp Signatures and Initials for Identification Policy and Procedure (MR-26)
2. GBHWC Electronic Signature Authorization/Confidentiality Form (F-MR-09)
3. GBHWC Clinical Staff Signature/Initial Legend (F-MR-03)