
Chapter: **CLINICAL PRACTICE**
Title: **CORRECTION, SUPPLEMENTATION, OR DELETION OF INFORMATION
FROM ELECTRONIC MEDICAL RECORD**

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Proposed by: Traci Smith 06/13/2025
Chief Executive Officer Date

Approved by: Al Lorenzo 06/14/2025
County Executive Office Date

I. ABSTRACT

This policy establishes the standards of Macomb County Community Mental Health (MCCMH), an official agency of the County of Macomb, to ensure that correction of errors, supplementation of information, and requests for removal of documents contained within its electronic medical record are performed in accordance with applicable state and federal laws and regulations.

II. APPLICATION

This policy shall apply to MCCMH administrative offices, directly-operated providers, contracted network providers, and Certified Community Behavioral Health Clinics (CCBHC) in Macomb County.

III. POLICY

It is the policy of MCCMH, as an official agency of the County of Macomb, to maintain accurate and complete clinical records for each MCCMH person served and to take precautions to ensure that records are not wrongfully altered or destroyed. Any changes or clarifications to the electronic medical record shall take place according to applicable state and federal laws and regulations.

IV. DEFINITIONS

A. Deletion

For the purposes of this policy, to delete means to remove a document from a person's active electronic medical record after archival of a true and accurate copy for accessibility and retrieval in accordance with applicable laws.

B. Signed Document

For the purposes of this policy, a signed document means a document that has been signed by the original signer and/or co-signer(s).

C. Unsigned Document

For the purposes of this policy, an unsigned document means a document that has not been signed by the original signer nor any co-signer(s).

V. STANDARDS

- A. The removal of any information contained in a person's served clinical record (paper or electronic) once signature(s) (handwritten or via electronic password) has been affixed shall only take place according to the procedures herein.
- B. Corrections of errors, supplementation of information, and requests for removal of documents contained within a person's active FOCUS electronic medical record shall only take place according to the procedures herein.
- C. MCCMH's Clinical Records Office shall manage any removal of documents from a person's active FOCUS electronic medical record. Removal of documents from the person's active FOCUS electronic record by the author of the document or their immediate supervisor is only permissible for select unsigned documents.
- D. Except for removal of select unsigned documents, static archives of documents deleted from a person's active FOCUS electronic medical record shall be maintained and stored as part of the person's complete medical record and shall be accessible for retrieval as necessary.
- E. Corrections of errors and supplementation of information to a person's paper medical record shall take place according to the standards set forth in MCCMH MCO Policy 2- 010, "Standards for Clinical Services Documentation."

VI. PROCEDURES

- A. Corrections of errors and supplementation of information to a person's active FOCUS electronic medical record shall be made using the FOCUS system's amendment process.
- B. When the FOCUS system's amendment process is not available or not applicable, the author of the document or their immediate supervisor may delete select unsigned documents themselves. For documents that staff persons are not permitted to delete themselves, deletion of the document may be requested immediately upon detecting the error.
 - 1. Staff persons requesting deletion from the person's active FOCUS electronic medical record shall complete a FOCUS Document Removal Request form, Exhibit A, and submit to his/her immediate supervisor. The form must include at a minimum the following information:
 - a. Name of staff making the request;
 - b. Person's served identification number and full name;
 - c. Document service date and time;

- d. Document type (e.g. Acknowledgment and Consent, Annual Assessment, Progress Note, etc.);
 - e. Date and time the document was added to FOCUS (see “Record Added” on lower left corner of FOCUS screen);
 - f. Reason for the document removal request.
2. Staff requesting document deletion shall secure the signature of Supervisory staff to indicate Supervisory staff’s approval of the deletion requested. Disagreements regarding document deletion requests shall be decided by the MCCMH Director of Community and Behavioral Health Services for directly-operated providers and the MCCMH Chief Network Officer for contracted providers.
 3. Completed, signed requests shall be forwarded to the MCCMH Clinical Records Office.
 4. Staff of contracted providers requesting document deletion shall ensure that claims adjustments have been made, if applicable, prior to forwarding the request to the MCCMH Clinical Records Office. Contracted provider staff shall attach a print screen of the claims adjustment to Exhibit A.

C. MCCMH Clinical Records Office

1. The MCCMH Clinical Records Office shall:
 - a. Generate an Adobe Acrobat .pdf version of the FOCUS document to be deleted;
 - b. Create a static archive of the Adobe Acrobat .pdf version of the document by transferring a copy of the file to a location that allows for accessibility and retrieval as necessary;
 - c. Delete the electronic version of the document from the person’s active FOCUS electronic medical record by utilizing the “delete” function.
2. Where the “delete” function is unavailable because the associated service activity log has been reported as an encounter and/or billed to a third-party payer, the MCCMH Clinical Records Office shall coordinate with applicable MCCMH departmental staff to void the encounter or billing. After voiding the encounter or billing, the MCCMH Clinical Records Office will access the “delete” link from the FOCUS electronic medical record.
3. The MCCMH Clinical Records Office shall forward requests to remove Fee Determination Agreements and other financial documents, as

applicable, to the MCCMH Finance Division for review and approval. Upon receipt of the Finance Division's approval, the MCCMH Clinical Records Office shall proceed with the document deletion request as outlined herein.

D. Reducing the Likelihood of Errors

1. Staff shall work within the electronic medical record of the fictitious "Joe Consumer" to learn how to navigate through or utilize a particular document in the FOCUS electronic medical record system and shall not use the "live" record of a person served for such purposes.
2. Staff may request that the MCCMH Information Systems Unit provide them with access to the FOCUS Test System for further familiarization with the data system.

VII. REFERENCES / LEGAL AUTHORITY

- A. Michigan Penal Code §750.492a
- B. Health Insurance Portability and Accountability Act (HIPAA) Privacy and Security Rule, 45 CFR 160-164
- C. MCCMH MCO Policy 2-010, "Standards for Clinical Services Documentation"
- D. MCCMH MCO Policy 10-320, "Designated Record Set"

VIII. EXHIBITS

- A. FOCUS Document Removal Request