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#### 2024

# The EHR Audit Trail Enigma: Understanding the benefits and uses of these mysterious documents

Pamela Hernandez, MBA-HML, BSCJ, RN, CPC, LNC Shelly Combs, BSN, RN, EMT-B, CEN, CADS, LNC Amy Puls, MSN, RN, APNP, FNP-BC



#### **Conflict of Interest Disclosure**

 We, Pamela Hernandez, Shelly Combs & Amy Puls, certify that, to the best of our knowledge, no affiliation or relationship of a financial nature with a commercial interest organization has significantly affected our views on the subject which is being presented.

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#### **Learner Outcomes/Objectives**

- Discuss the basic rules and regulations that govern the production of EHR audit trails
- Identify 3 common uses for EHR audit trail analysis in medical malpractice
- Identify and discuss how education related to EHR audit trail analysis is beneficial in the medical malpractice field

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### **Our Why**

Collectively we are three diverse and experienced nurses who joined forces in late 2022 to provide education to others related to EHR audit trail analysis. The benefits of EHR audit trails in the medical malpractice arena are extensive and it is expected that the use of the data collected within the audit trails will only continue to grow. Our goal is to provide education that is valuable to others in both the healthcare and legal arena.



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# Audit Trail Requirements

#### Requirements and standards related to Audit Trails

Pamela Hernandez, MBA-HML, BSCJ, RN, CPC, LNC

### **Audit Trails and Their Requirements**

- What is an Audit Trail?
  - Audit Trail is defined as "a record that shows who has accessed a computer system, when it was accessed, and what operations were performed during the access period."

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## **Audit Trails and Their Requirements**

#### Audit Trail

- Retention
- Technology Requirements
- Regulations

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### **Audit Trails**

Technology Requirements	Regulation
American Recovery & Reinvestment Act	CFR
Office of the National Coordinator for Health Information Technology (ONC-HIT)	CMS
HITECH	HIPAA
NIST	Federal Rules of Civil Procedure
	ASTM Standards

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### **The Courts and Production**

- Consistently, defendants argue that the audit trail is not relevant and, therefore, the Court should deny its disclosure.
- Many defendants state audit trail requests are a "fishing expedition".
- Many defendants argue that audit trail requests place an undue burden



### **REQUIREMENTS RECAP**

- Audit Trails are the DNA of the medical record.
- EHR users are not required to retain audit trails.
  - They are required to retain audit data.
  - This data (sometimes called metadata) is generated during the creation of each individual's medical record.
- Audit Trails are not burdensome and are relevant to medical records review. They provide proof of authenticity and proof of accuracy of the EHR.
- Any facility that receives federal funding must use an ONC certified electronic medical records system and be able to provide an audit trail.

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# Audit Trail Analysis Benefits in Medical Malpractice

What can the audit trail show us and why should be analyzing the data

Shelly Combs, BSN, RN, EMT-B, CEN, CADS, LNC

### **3 Common Findings with Analysis**

- Views of the record
  - Who
  - What
  - When
- Signing Actions
  - Pend/Save
  - Addendums
  - Sign
- Additional Discovery Documents
  - All the things we don't typically get with the printed legal record

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#### Viewing actions......Epic

В		E	F	G	K	L	N	0
1 Timestamp (CDT)	Access By Name	Event	Event Area	🔻 Туре	T Encounter	<ul> <li>Platform</li> </ul>	<ul> <li>Workstation</li> </ul>	Associated Data
***************************************								Report viewed
								KS HOME MEDS (NAVIGATOR)
109 06/02/2017 08:15:40 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	[50075160]
								Report viewed
								Visit Info Reports: Recent Visits
								to Others in Visit Providers
110 06/02/2017 08:15:40 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	Specialty [22330]
								Report viewed
								Visit Info Reports: Recent Visits
111 06/02/2017 08:15:40 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	to Visit Provider [22326]
								Report viewed
								REFERRING PROVIDER NAV SEC
112 06/02/2017 08:15:40 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	[30070031]
								Note IDs
								Progress Notes by Yogibear,
								Ranger, MD on 06/02/17
								[191732267]
								Note accessed from
								Patient Chart
								Visit Navigator
113 06/02/2017 08:15:49 AM	Yogibear, Ranger, MD	View clinical notes section	Clinical Notes	View	Office Visit on 06/02/17	Hyperspace	KS839SP02WS8680	SEC_CHARTING_MULTIPLE [118]
								Flowsheet Template
114 06/02/2017 08:15:51 AM	Yogibear, Ranger, MD	Visit Navigator Flowsheet section viewed	Flowsheets	View	Office Visit on 06/02/17	Hyperspace	KS839SP02WS8680	KSC PAIN SOAPP-R [133]
								Report viewed
								KSC PAIN_SOAPPR_SCORING
115 06/02/2017 08:15:51 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	[800001]
116 06/02/2017 08:20:43 AM	Yogibear, Ranger, MD	Order Entry activity accessed	Orders	View	Office Visit on 06/02/17	Hyperspace	KS839SP02WS8680	
								Report viewed
								KSC PAIN_SOAPPR_SCORING
122 06/02/2017 08:23:56 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	[800001]
								Report viewed
								KS HOME MEDS (NAVIGATOR)
123 06/02/2017 08:23:56 AM	Yogibear, Ranger, MD	Report with patient data viewed	Patient Clinical Info	View	N/A	Hyperspace	KS839SP02WS8680	[50075160]
					The second se			

#### Viewing actions.....Cerner

	В	C	E	F	R	S	T	U	V	W	Х
1	Date & Time	Personnel Name	✓ User ID	✓ Role	Device Name	Application	<ul> <li>Access Type</li> </ul>	Event	<ul> <li>Event Name</li> </ul>	Event Type	Event Description
4	09/12/2019 22:25:51 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Care Plan - View	Care Plan	Read	The user selected plan profile within powerorders to view plans
5	09/12/2019 22:25:51 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Order Profile - View	View Orders	Order Profile	The user viewed the order profile from powerorders/medication list
24	09/12/2019 22:23:33 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Clinical Diagnosis - View	Clinical Diagnoses	Read	Diagnoses were visible or a process associated with diagnoses was viewed
2!	09/12/2019 22:23:33 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Procedures - View	Procedures	Read	Procedures were visible or a process associated with procedures was viewed, such as an order
2(	09/12/2019 22:23:33 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Care Plan - View	Care Plan	Read	The user selected plan profile within powerorders to view plans
28	09/12/2019 22:23:33 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	Order Profile - View	View Orders	Order Profile	The user viewed the order profile from powerorders/medication list
32	09/12/2019 22:22:17 CDT			WH UC/PCT Bed Placement	STVNFLCTX82/5PBD0S2	HNA: Powerchart	View	IView - Open	Interactive View	View	The user opened the interactive view
96	09/12/2019 18:40:40 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	Clinical Diagnosis - View	Clinical Diagnoses	Read	Diagnoses were visible or a process associated with diagnoses was viewed
97	09/12/2019 18:40:40 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	Procedures - View	Procedures	Read	Procedures were visible or a process associated with procedures was viewed, such as an order
98	09/12/2019 18:40:40 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	Clinical Diagnosis - View	Clinical Diagnoses	Read	Diagnoses were visible or a process associated with diagnoses was viewed
15	09/12/2019 18:37:38 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	IView - Open	Interactive View	View	The user opened the interactive view
17	09/12/2019 18:36:26 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	IView - Open	Interactive View	View	The user opened the interactive view
18	09/12/2019 18:35:02 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	IView - Open	Interactive View	View	The user opened the interactive view
18	09/12/2019 18:34:59 CDT			WH RN	STVNFLCTX63/5NQC0S2	HNA: Powerchart	View	IView - Open	Interactive View	View	The user opened the interactive view

#### Signing Actions.....Epic

	В	C	E	F	G	К	L	N	0
1 Ti	mestamp (CDT) 🛛 🔻	Access By Name	🕶 Event	🕶 Event Area	🔻 Туре	T Encounter	Platform	<ul> <li>Workstation</li> </ul>	Associated Data 💌
675 07	7/12/2017 10:51:51 AM	Yogibear, Ranger, MD	Pend clinical note	Clinical Notes	Modify	Office Visit on 07/12/17	Hyperspace	KS847SM01WS6987	Note Progress Notes by Yogibear, Ranger, MD on 07/12/17 [193152767] Note accessed from Patient Chart
679 07	7/12/2017 10:51:56 AM	Yogibear, Ranger, MD	Clinical Note Signed	Clinical Notes	Modify	Office Visit on 07/12/17	Hyperspace	KS847SM01WS6987	Note Progress Notes by Yogibear, Ranger, MD on 07/12/17 [193152767]
725 07	7/14/2017 04:15:10 PM	Yogibear, Ranger, MD	Clinical Note Signed	Clinical Notes	Modify	Office Visit on 07/12/17	Hyperspace	KS239SP02WS8658	Note Progress Notes by Yogibear, Ranger, MD on 07/12/17 [193277682]
859 07	7/17/2017 10:06:23 AM	Heart, Clogged J, MA II	Clinical Note Signed	Clinical Notes	Modify	Office Visit on 07/12/17	Hyperspace	KS739SP02WS8686	Note Progress Notes by Heart, Clogged J, MA II on 07/12/17 [193309289]
1301 07	7/18/2017 09:01:31 AM	Tropical, Annie, DC	Pend clinical note	Clinical Notes	Modify	Office Visit on 07/17/17	Hyperspace	K\$739\$P02W\$8662	Note Progress Notes by Tropical, Annie, DC on 07/18/17 [193356633] Note accessed from Patient Chart
1302 07	7/18/2017 09:01:32 AM	Tropical, Annie, DC	Clinical Note Signed	Clinical Notes	Modify	Office Visit on 07/17/17	Hyperspace	KS739SP02WS8662	Note Progress Notes by Tropical, Annie, DC on 07/18/17 [193356633]
1353 07	7/18/2017 09:28:08 AM	Tropical, Annie, DC	Pend clinical note	Clinical Notes	Modify	Office Visit on 07/18/17	Hyperspace	KS839SP02WS4714	Note Progress Notes by Tropical, Annie, DC on 07/18/17 [193359110] Note accessed from Patient Chart

### Signing Actions.....Cerner

	в	С	E	F	R	S	T	U	V	W	Х
1	Date & Time	Personnel Name	✓ User ID	<ul> <li>Role</li> </ul>	Device Name	Application	Access Type 🔍	Event 👻	Event Name	T Event Type	Event Description
				Care Management					Maintain Clinical	Attempt to Sign	The user signed a clinical
266	09/12/2019 13:30:04 CDT			Staff	STVNFLCTX83/C9KDMF2	HNA: Powerchart	Sign	Clinical Document - Sign	Document	Document	document
									Maintain Clinical	Attempt to Sign	The user signed a clinical
525	09/12/2019 09:26:32 CDT			WH Physician	STVNFLCTX34/43YYJB2	HNA: Powerchart	Sign	Clinical Document - Sign	Document Maintain Clinical	Document	document The user modified a clinical
506	09/12/2019 09:26:32 CDT			WH Physician	STVNFLCTX34/43YYJB2	HNA: Powerchart	Modify	Clinical Document - Modify	Document	Attempt to Modify Document	document
520	03/12/2013 03.20.32 CD1			WH Physician	STVINFLCTA34/43113DZ	HIVA. FOWEICHAIL	would	Clinical Document - Moully	Maintain Clinical	Attempt to Modify	The user modified a clinical
755	09/12/2019 06:45:03 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Modify	Clinical Document - Modify	Document	Document	document
	01122010 00.10.00 001				CITIN LONA INCONCLOL	THUE TOMOTOMATE	iniouny	onnear bocament moany	Document	Document	doodmont
756	09/12/2019 06:45:03 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Modify	Clinical Document (no sign/authenticate privilege) - Submit	Maintain Clinical Document	Attempt to Submit Document	A user without sign/authenticate privileges submitted a clinical document to another provider for authentication. Seen generated by these products: Medical Transcription Management and PowerNote.
									Maintain Clinical	Attempt to Save	The user saved a clinical
774	09/12/2019 05:48:46 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Modify	Clinical Document - Save	Document	Document	document
									Maintain Clinical	Attempt to Save	The user saved a clinical
115	09/12/2019 05:48:46 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Modify	Clinical Document - Save	Document Maintain Clinical	Document	document
777	09/12/2019 05:43:58 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Add	Clinical Document - Copy Forward	Document	Document	The user copied a structured document to a new document
	03/12/2013 03.43.30 CD1			vvri ivilulevel	51 VIVI LC1/41/55 V5202	HINA. FOWErchan	Auu	Clinical Document Smart	Maintain Clinical	Attempt to Insert Smart	The user inserted a smart
780	09/12/2019 05:43:58 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
								Clinical Document Smart	Maintain Clinical		The user inserted a smart
784	09/12/2019 05:43:58 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
				Care Management					Maintain Clinical	Attempt to Sign	The user signed a clinical
1578	09/11/2019 15:19:16 CDT			Staff	STVNFLCTX84/C9KDMF2	HNA: Powerchart	Sign	Clinical Document - Sign	Document	Document	document
									Maintain Clinical	Attempt to Modify	The user modified a clinical
1908	09/11/2019 07:38:25 CDT			WH Physician	STVNFLCTX93/43YYJB2	HNA: Powerchart	Modify	Clinical Document - Modify	Document Maintain Oliviant	Document	document
1000	09/11/2019 07:38:25 CDT			WH Physician	STVNFLCTX93/43YYJB2	HNA: Powerchart	Cinn	Clinical Document - Sign	Maintain Clinical Document	Attempt to Sign Document	The user signed a clinical document
1909	03/11/2019 07.30.25 CD1			WH Physician	STVINFLUTA93/43113DZ	HIVA. Powerchan	Sign	Clinical Document - Sign	Document	Document	document
								5	Maintain Clinical	Attempt to Submit	A user without sign/authenticate privileges submitted a clinical document to another provider for authentication. Seen generated by these products: Medical Transcription Management and
1921	09/11/2019 07:23:47 CDT			WH Midlevel	STVNFLCTX63/93VJZC2	HNA: Powerchart	Modify	Submit	Document	Document	PowerNote.
1											

#### The Unknown Documents......Epic

VIEW E RESULTS 1 158 06/02/2017 10:59:51 AM Yogibear, Ranger, MD In Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS239SP02WS8658 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS239SP02WS8658 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS8658 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS8686 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS8686 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS8686 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket Message Viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS86866 Print IN Basket Message Viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace Hypersp	B	С	E	F	G	K	L	N	0
L58 06/02/2017 10:59:51 AM Yogibear, Ranger, MD In Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace K52395P02WS8658 Print IN BAS STAND Epicv In 1 277 06/02/2017 02:57:32 PM Heart, Clogged J, MA II In Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace K57395P02WS8658 Print IN BAS STAND Epicv In 1 3 Fabre Patient Clinical Info View Office Visit on 06/02/17 Hyperspace K57395P02WS8658 Print IN BAS STAND Epicv In 1 3 Fabre Patient Clinical Info View Office Visit on 06/02/17 Hyperspace K57395P02WS8658 Print IN BAS STAND Epicv In 1 3 Fabre Patient Clinical Info View Office Visit on 06/02/17 Hyperspace K57395P02WS8658 Print IN BAS STAND Epicv In 1	1 Timestamp (CDT)	Access By Name	<ul> <li>Event</li> </ul>	🖵 Event Area	<ul> <li>Type</li> </ul>	<ul> <li>Encounter</li> </ul>	<ul> <li>Platform</li> </ul>	<ul> <li>Workstation</li> </ul>	Associated Data
177       06/02/2017 02:57:32 PM       Heart, Clogged J, MA II       In Basket message viewed       Patient Clinical Info       View       Office Visit on 06/02/17       Hyperspace       KS739SP02WS8686       Primi IN BAS         177       06/02/2017 02:57:32 PM       Heart, Clogged J, MA II       In Basket message viewed       Patient Clinical Info       View       Office Visit on 06/02/17       Hyperspace       KS739SP02WS8686       Primi IN BAS         178       STAND       STAND       STAND       STAND       Finitian In Basket Message Viewed       Primi IN BAS	L58 06/02/2017 10:59:51 AM	Yogibear, Ranger, MD	In Basket message viewed	Patient Clinical Info	View	Office Visit on 06/02/17	Hyperspace	K\$239SP02W\$8658	VIEW EXTENSION REPORT - RESULTS [1005500], KS LAST 5 APPT REPORT [40150700] In Basket message 105326732 Message type Results
Print IN BAS STAND Epicv In I	177 06/02/2017 02:57:32 PM	Heart, Clogged J, MA II	In Basket message viewed	Patient Clinical Info	View	Office Visit on 06/02/17	Hyperspace	K\$739\$P02W\$8686	Print group report IDs IN BASKET: CONSOLIDATED STANDARD HEADER [5506], EpicView Report [2599] In Basket message 105339766 Message type Result Notes
182 06/02/2017 02:57:36 PM Heart, Clogged J, MA II In Basket message viewed Patient Clinical Info View Office Visit on 06/02/17 Hyperspace KS739SP02WS8686									Print group report IDs IN BASKET: CONSOLIDATED STANDARD HEADER [5506], EpicView Report [2599] In Basket message 105339766 Message type Result Notes

1	В	С	E	F	G	K	L	N	0
1	Timestamp (CDT)	Access By Name	Event	Event Area	▼ Туре	Encounter	Platform	Workstation	Associated Data
416	07/08/2017 11:33:12 AM	Winters, OldMan, MD	BestPractice Advisories displayed	Patient Clinical Info	View	Office Visit on 07/08/17	Hyperspace	KS853FM03WS7533	ALERT_ID 723 ALT_DAT 57059 ALT_ID 34797041
417	07/08/2017 11:33:14 AM	Winters, OldMan, MD	BestPractice Advisories viewed	Patient Clinical Info	View	Office Visit on 07/08/17	Hyperspace	KS853FM03WS7533	ALERT_ID 723 ALT_DAT 57059 ALT_ID 34797041

#### The Unknown Documents......Epic

- 24	В	C	E	F	G	К	L	N	0
1	Timestamp (CDT) 🛛 💌	Access By Name	Event ,1	Event Area 💌	Туре 🔻	Encounter 💌	Platform 💌	Workstation 💌	Associated Data
	07/17/2017 03:02:45 PM		Image viewed				Hyperspace	KS708FD02WS6647	Coverage subscriber Ratchett, Mickey [1634605] Document name 29239779
1117	07/17/2017 03:02:45 PM		Image viewed	Documents	View	N/A	Hyperspace	KS708FD02WS6647	
1120	07/17/2017 03:03:47 PM		Image viewed	Documents	View	N/A	Hyperspace	KS708FD02WS6647	Coverage subscriber Ratchett, Mickey [1634605] Document name 15369276

. 4	В	C	E	F	G	K	L	N	0
1	Timestamp (CDT) 🛛 🔽	Access By Name	Event	🛛 Event Area 🖉	Type 🔽	Encounter 💌	Platform .	Workstation	Associated Data
									Care Everywhere Document
									Clinical Summary received from
									CHI St. Luke's Health on
316	07/08/2017 11:07:08 AM	Tiptop, Quietly R, CMA I	Care Everywhere document accessed	Patient Clinical Info	View	N/A	Hyperspace	KS753FM03WS7605	07/08/2017

- 24	В	C	E	F	G	K	L	N	0
1	Timestamp (CDT) 🛛 🔽	Access By Name	Event ,T	Event Area 🖉	Туре 🔽	Encounter 💌	Platform	- Workstation -	Associated Data
139	06/02/2017 08:31:12 AM	Redhot, Cinnamon	Imaging Exam begun	Patient Clinical Info	Modify	Appointment on 06/02/17	Hyperspace	KS239XR01WS5915	Order IDs Imaging ordered on 06/02/17 - LUMBAR SPINE 2 VIEWS UPRIGHT [78295451]
151	06/02/2017 08:40:06 AM	Redhot, Cinnamon	Imaging Exam ended	Patient Clinical Info	Modify	Appointment on 06/02/17	Hyperspace	KS239XR01WS0964	Order IDs Imaging ordered on 06/02/17 - LUMBAR SPINE 2 VIEWS UPRIGHT [78295451]

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	В	C	E	F	R	S	Т	U	V	W	Х
1 [	Date & Time	<ul> <li>Personnel Name</li> </ul>	▼ User ID	Role	<ul> <li>Device Name</li> </ul>	<ul> <li>Application</li> </ul>	Access Type	✓ Event	JEvent Name	<ul> <li>Event Type</li> </ul>	<ul> <li>Event Description</li> </ul>
											The user viewed an item in
537 0	9/12/2019 09:25:51 CDT			WH Physician	STVNFLCTX34/43YYJB2	HNA: Powerchart	Message	Inbox - View	Inbox	View Message	inbox
											The user viewed an item in
538 0	9/12/2019 09:25:51 CDT			WH Physician	STVNFLCTX34/43YYJB2	HNA: Powerchart	Message	Inbox - View	Inbox	View Message	inbox
											The user viewed an item in
1914 0	9/11/2019 07:35:11 CDT			WH Physician	STVNFLCTX93/43YYJB2	HNA: Powerchart	Message	Inbox - View	Inbox	View Message	inbox
											The user viewed an item in
2004 0	9/11/2019 07:04:24 CDT			WH Physician	STVNFLCTX93/43YYJB2	HNA: Powerchart	Message	Inbox - View	Inbox	View Message	inbox
											The user viewed an item in
2076 0	9/11/2019 07:01:16 CDT			WH Physician	STVNFLCTX93/43YYJB2	HNA: Powerchart	Message	Inbox - View	Inbox	View Message	inbox

1	В	С	E	F	R	S	Т	U	V	W	Х
1	Date & Time	Personnel Name	✓ User ID	✓ Role	<ul> <li>Device Name</li> </ul>	<ul> <li>Application</li> </ul>	Access Type	✓ Event	J Event Name	<ul> <li>Event Type</li> </ul>	<ul> <li>Event Description</li> </ul>
								Clinical Document Smart	Maintain Clinical	Attempt to Insert Smart	The user inserted a smart
780	09/12/2019 05:43:58 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
								Clinical Document Smart	Maintain Clinical	Attempt to Insert Smart	The user inserted a smart
784	09/12/2019 05:43:58 CDT			WH Midlevel	STVNFLCTX41/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
	The second se							Clinical Document Smart	Maintain Clinical	Attempt to Insert Smart	The user inserted a smart
1934	09/11/2019 07:22:28 CDT			WH Midlevel	STVNFLCTX63/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
								Clinical Document Smart	Maintain Clinical	Attempt to Insert Smart	The user inserted a smart
3152	09/10/2019 17:17:06 CDT			WH Midlevel	STVNFLCTX55/93VJZC2	HNA: Powerchart	Add	Template - Insert	Document	Template	template into a document
-	B	C	E	F	R	S	T	U	V	W	X
1	B Date & Time	C Personnel Name	E JT User ID	F ▼ Role	14	Application	T Access Type	v Event	✓ Event Name	W ▼ Event Type	× Event Description →
1		C Personnel Name	E I User ID		<ul> <li>Device Name</li> </ul>						The user selected plan profile
1	B Date & Time 09/11/2019 07:04:15 CDT	C Personnel Name	E J User ID	F Role WH Physician	14	Application HNA: Powerchart	T Access Type View	▼ Event Care Plan - View	Event Name Care Plan	W Event Type Read	The user selected plan profile within powerorders to view plans
1		C Personnel Name	E J User ID		<ul> <li>Device Name</li> </ul>						The user selected plan profile
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### When Should The Audit Trail Be Considered?

- To validate the integrity of records
  - To ensure ALL available records were provided
  - EVERY SINGLE CASE
- Abnormal signing actions
  - Signatures days, months, or weeks later
  - A timeframe that seems to have been altered or edited
- Abnormal or inconsistent entries
  - Often your gut instinct
  - Bulk entries at the exact same time
  - Potential missing information





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2024

# AALNE

# **Audit Trail Production**

#### Recommending an Audit Trail To Your Attorney Clients

Amy Puls, MSN, RN, APNP, FNP-BC

#### **3 Steps to Recommending an Audit Trail**

- Identify the need (always recommend the AT)
  - Missing records
  - Large time gaps
  - Suspicious addendums, signatures, or documentations
- Illustrate the reason
  - Paint the picture
- Display the benefit
  - Describe possible outcomes

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### **Identify the Need**

#### Case Study

Ms. B was seen for an annual physical by her PCP on 09/10/2018. She was having dyspareunia. A pelvic exam was not performed at that appointment due to time constraints. Ms. B indicates she was asked to make another appointment to address this issue. **DYSPAREUNIA** 

Due to scheduling difficulties, her provider canceling appointments, and appointments scheduling out quite far, Ms. B was not able to get back in for her pelvic until the following year when she returned for another CPE. NO PELVIC EXAM PERFORMED

She continued to have dyspareunia and was now also experiencing post-coital bleeding. A pap was attempted, but due to significant cervical mass it was not completed. She was subsequently referred for pelvic ultrasound and Gynecology appointment. DYSPAREUNIA AND POST-COITAL BLEEDING WITH CERVICAL MASS

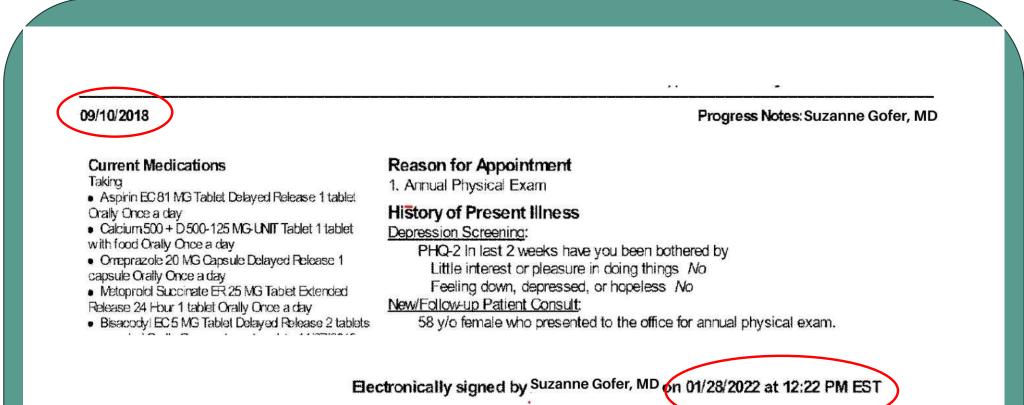
She was diagnosed with cervical cancer with metastasis and is pursuing litigation against her PCP for delayed care and diagnosis. Her PCP, Dr. Gofer is indicating she was unaware of any concerns for dyspareunia and would have performed a pelvic exam initially if she was aware. **DELAYED CANCER** 

DIAGNOSIS





#### **Illustrate the Reason**



Sign off status: Completed

#### **Display the Benefit**

#### **Possible Outcomes**

- Dr. Gofer may not have known about the dyspareunia. Could have been discussed with nurse and not relayed.
- Dr. Gofer knew about the concern but did not document it.
- Ms. B may have cancelled several appointments.
- Ms. B may not have understood the urgency of things.
- Dr. Gofer knew about the concern, documented it, and then went back into the chart to make necessary edits to hide things.
- All versions of the note can be requested in further discovery.





### Audit Trail Misconceptions

Fiction	Fact			
Difficult to Produce	A few clicks of some buttons by IT			
Burdensome	ASTM states otherwise			
Not beneficial/not needed	Depends on the case			
Expensive	No more than requesting medical records			
Only show wrongdoings	Can support and refute MR documentation			
Fishing Expedition	The patient has a right to know who accessed their information and what occurred during such access. (ASTM E2147-18)			

#### **Barriers to Production**

- Misconceptions don't know what they don't know
- Facilities do not want to produce them fear
- Facilities do not know HOW to produce them
  - Historically used for internal audits to study clinical activity (Rule, Chiang, Hribar, 2020)

#### PDF vs Excel

- Should always be produced in Excel to avoid losing important data
- Locked vs Unlocked
  - Should be unlocked
  - You can unlock it if needed
- Incomplete or Edited
  - Compare against the printed MR

#### **Example of Excel Format -> PDF**

	А	В	С	D	E	F	G		
1	Timestamp (CDT)	Access By Name	Event	Event Area	Туре	Encounter	Associated Data		
2	05/12/2017 09:34:41 AM	Pocket, Polly CMA	Report with patient data printed	Reporting	Export	N/A	Report viewed		
3	05/12/2017 11:53:18 AM	Bird, Big, MD	Pend clinical note	Clinical Notes	Modify	Office Visit on 05/12/17	Note		
4	07/14/2017 04:13:33 PM	Monster, Cookie, MD	Results reviewed in IB	Orders	Modify	Office Visit on 07/12/17	Order ID		
5	07/14/2017 04:13:44 PM	Monster, Cookie, MD	Results reviewed in IB	Orders	Modify	Office Visit on 07/12/17	Order ID		
6	07/14/2017 04:13:45 PM	Monster, Cookie, MD	Results reviewed in IB	Orders	Modify	Office Visit on 07/12/17	Order ID		
	Timestamp (CDN_Ac	cess By Name Event	Event Area	Туре	Enco	unter			
		cket, Polly CM Report							
	and the second second second second second second			Export	N/A		$\frown$		
				Modify		e Visit on 05/1			
	07/14/2017 04: <mark>1</mark> 3 M	onster, Cook <mark>ie Re</mark> sults	reviewed Orders	Modify	Offic	e Visit on 07/1	ſ		
	07/14/2017 04:13 M	onster, Cookie Results	reviewed Orders	Modify	Offic	e Visit on 07/1	•		
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### **RECOMMENDATION RECAP**

- Recommending an audit trail takes 3 steps:
  - Identify a NEED,
  - Illustrate a REASON,
  - Display a BENEFIT.
- Misconceptions about audit trails contribute to production barriers.
- ATs should be produced in:
  - Unaltered,
  - Unlocked,
  - Excel format.
  - From the date in question THROUGH the date the records were printed.

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