

Practice Directive 27

E-FILE Guidelines Update

Date: May 28, 2001

This practice directive replaces the previous E-File guidelines contained in both Practice Directive #17 and Practice Directive #21.

Background:

Practice Directive #17, Freedom of Information and Protection of Privacy Update, was released on August 25, 1998. It provided an overview of changes to the Rehabilitation Services and Claims Manual (the "RSCM") aimed at clarifying both the information available to workers on disclosure of their claim files and how the Board treats sensitive and personal information. As well, Practice Directive #17 highlighted several aspects of the E-File system that fall within the *Freedom of Information and Protection of Privacy Act* ("FIPPA").

These policy and practice changes necessitated several enhancements to the E-File system, which ensure that the Board is appropriately adhering to the FIPPA requirements. As a result, Practice Directive 21 was released on February 12, 1999.

Since then, further enhancements to the E-File system necessitated practice changes as outlined below. Practice Directive #27 details the changes in E-File guidelines for staff performing such functions as moving, copying and deleting documents, pages and log entries. **Practice Directive #27 replaces the previous E-File guidelines contained in both Practice Directive #17 and Practice Directive #21.**

Document Guardian:

The Document Guardian and his/her designates, are responsible for the physical deletion of documents, pages and log entries from the E-File system. Other types of requests for permanent data removal in the E-file system (i.e. Message log entries) should be referred to the ISD Help Desk. The position identified as the Document Guardian is the Client Services Manager, Compensation Services (Operations Department). The Document Guardian designates include the Manager, Operations, and the Central Operations Supervisors in the Operations Department. Outlined below are the guidelines that the Document Guardian and his/her designate follow to complete the requested physical delete.

- The Document Guardian desk will be reviewed regularly throughout the business day.
- Requests for physical deletes will be held for 24 hours prior to processing.
- The Document Guardian or designate will contact the requestor for clarification or additional information as required in order to determine if the requested physical delete is appropriate.
- The Document Guardian or designate may decide not to delete the document if it is determined to be relevant to the adjudication of the claim.
- Deletions will be completed from the image viewer to ensure that the correct document is being reviewed for deletion.

Guidelines:

1. *Moving E-File Documents, Pages and Log Entries from One E-File Claim to Another*

1a. *Moving E-File Documents from One E-File Claim to Another*

When an imaged document has been incorrectly placed on an E-File claim, E-File users can use the **move** function in E-File to move the document to the correct E-file claim. When an imaged page has been incorrectly placed on an E-File claim, E-File users can use the move function, under the page column of the image viewer, to move a page to the correct document. However, the page can only be added to an existing document.

It may occur that an imaged document is incorrectly placed on an E-File claim, but that a claim number has not yet been created for the document. In this case, E-File users must request a re-scan in E-File indicating to the Scan 001 desk that the document is on the wrong claim. If the document was the only record on the original claim, E-File users must indicate to the Scan 001 desk in the text field that once the document has been re-scanned, the Scan 001 desk must request a physical delete of the document in the original claim.

1b. *Moving Log Entries from One E-File Claim to Another*

When a claim log entry is saved to the incorrect claim, users can select to move the log entry to the correct E-File claim.

2. *Removal of E-File Documents, Pages and Log Entries – Request Physical Delete*

The request physical delete function was added to E-File to support the ability to permanently delete documents, pages and log entries from the E-File system.

Examples of documents, pages or log entries which will be considered for physical deletion include:

- documents, pages or log entries unrelated to the claim in which they are located;
- documents, pages or log entries which are not required for the adjudication or management of the claim;
- documents, pages or log entries or sections of either which contain personal information relating to a third party;
- administrative errors, e.g. a previous or draft version of a memo imported/exported into the claim file rather than the final version;
- documents, pages or log entries containing information unrelated to the claim file; and
- documents or log entries containing information on unrelated claims (e.g. a list from a physician's office containing all of the WCB patients seen for a particular time period).

Examples of documents, pages or log entries that will not be deleted include:

- duplicate documents, pages or log entries;
- documents, pages or log entries which have been distributed outside of the Board; and
- documents, pages or log entries which are essential to the adjudication and management of the claim file.

2a. Request Physical Delete of E-File Documents

When a document or a page that should not be part of a claim file is identified, the E-File user must:

- i. Select the request physical delete function to remove the document. To ensure that the correct document is deleted, the E-file user must request the physical delete of the document or page **from the image viewer** with the document displayed in it.

- ii. The message text box displays and the user must provide a reason for the request. This message is sent to the Document Guardian's desk. This message, once completed, does not show up on the E-File claim.

2b. Request Physical Delete of E-File Log Entries

Where a log entry contains a reference to a physically deleted document(s), as well as other information relevant to the claim, and there is no document link, the E-File user must request a physical delete of the log entry that contains the document reference. The guidelines for requesting a physical delete of part of a log entry are discussed in guideline 3c.

3. Partial Deletion of E-File Documents and Log Entries

3a. Partial Deletion of an E-File Document – Sensitive/Irrelevant Information

In certain instances, sensitive (personal) and/or irrelevant information may be contained within an E-File document or log entry, in addition to information relevant to the adjudication of the claim. When sensitive and/or irrelevant information is contained in an E-File document, the E-File user:

- i. "Highlights" the portion of the document that is to be removed (using the annotation toolbar yellow highlighter).
- ii. From the image viewer, selects the request physical delete function to remove the document.
- iii. In the message text Reason Area, provide the Document Guardian with the reason for the requested deletion.

The Document Guardian or designate will print the document, block out the irrelevant information from the printed document, physically delete the original, and scan the edited document into the E-File claim.

3b. Partial Deletion of an E-File Document – Incorrect E-File Claim

In some cases, a document or page may also be scanned into E-file that includes information pertaining to another claim. In this case, the E-File user:

- i. Requests physical delete of the document from the image viewer with the document displayed in it.
- ii. In the message text Reason Area, provide the Document Guardian with the section to be placed on the correct claim and deleted from the original. If known, also include the claim number of the correct claim.

3c. Partial Deletion of a Log Entry – Sensitive or Irrelevant Information

There is a separate process required for physically deleting sensitive (personal) and irrelevant information contained in a log entry which also contains information relevant to the adjudication of the claim. In this situation, the E-File user:

- i. Creates a new log entry by copying and pasting the original log entry text into a new log entry. The E-file user must change the event date of the new log entry to that of the original.
- ii. Edits the new log entry to remove the irrelevant information prior to saving it in the E-File claim.
- iii. Requests the physical deletion of the original log entry.

4. Copying E-File Documents and Log Entries

Documents, pages and log entries are occasionally placed on E-File claims that reference other claim numbers belonging to the same worker with the same employer. In these instances, E-File users can copy a document, page or log entry to another claim file while maintaining the document or log entry on the original claim.

5. Mark as Duplicate E-File Documents and Log Entries

Duplicate copies of documents (such as medical reports) are received by the Board and placed on E-File. E-File users can use the “mark as duplicate” function in E-File to remove the duplicate document, page or log entry from view. Using the mark as duplicate function in E-File does not permanently delete the document or log entry from the WCB database. E-File users can use the “remove mark as duplicate” function to retrieve the document, page or log entry at any time. Also, the filter capability allows the E-file user to view all documents, pages or log entries which are marked as duplicates.

6. Unsolicited Information – Anonymous and Identified on an E-File Claim

Policy Item #99.23 of the RSCM outlines the procedures that are followed when unsolicited anonymous information or information from an identified source is received orally or in written form. The procedures for E-File claims are identical to that of paper file claims.

6a. Unsolicited Hard Copy Information Received on an E-File Claim

When Board staff receive unsolicited anonymous hard copy information, it is automatically transferred to the claim owner¹ administering the claim. The document or a copy must not be added to the E-File claim. Where the information is clearly irrelevant to the adjudication of the claim, it will be destroyed.

Where the claim owner considers the information relevant or potentially relevant to the worker's claim, the information is transferred to the Board's Claims Investigation Section ("Claims Investigations") for investigation and verification. If the information is considered accurate, the Claims Investigator will forward the document to the claim owner. If the claim owner determines it is relevant or potentially relevant, the document will be scanned into the E-File claim. If the claim owner considers the information irrelevant, the information will be destroyed. If, following investigation by the Claims Investigator, the information is considered to be inaccurate, it will then be destroyed.

6b. Unsolicited Telephone Information Received on an E-File Claim

Care must also be taken in the documentation of unsolicited anonymous information received by telephone. No reference to the content of the telephone conversation is to be placed on the E-File claim until Claims Investigations has had the opportunity to investigate and verify the information.

Board staff receiving unsolicited anonymous information by telephone must:

- i. Complete the Anonymous Information Form, which is contained in Compensation Services Forms on BoardNet.
- ii. Forward the completed Anonymous Information Sheet to the claim owner to determine if the information is potentially relevant to the worker's claim.
- iii. If the information is considered relevant, the Anonymous Information Form is sent to Claims Investigations so that it can be investigated and verified. If the information is determined to be inaccurate, it is destroyed.
- iv. If the information is accurate and is considered relevant to the adjudication of the claim, the claim owner will have the information placed on the E-File claim.
- v. If the information is considered irrelevant, it will then be destroyed.

¹ Claim owner is defined as a Client Service Representative, Entitlement Officer, Case Manager, Claims Adjudicator or Claims Officer.

If unsolicited or unsubstantiated anonymous information is inadvertently placed on the E-File claim, the Case Manager or other Board officer administering the claim must request its removal in accordance with E-File Guideline #2, Request Physical Delete.

7. *Personal Inspection of an E-File Claim*

Section 5(2) of the Freedom of Information and Protection of Privacy Act states that:

“The applicant may ask for a copy of the record or ask to examine the record.”

When there were only paper claim files, a worker or employer would attend at a Board Office and physically review his or her own file. The same practice will hold for E-File claims. Each Board office will identify a terminal to be used by workers or employers for viewing E-File claims in the presence of a Board staff member.

- 8. *Authorized E-File users in all divisions are reminded that their authority only pertains to claims which they have a valid business reason for reviewing.***