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| DOCUMENT TITLE: Copy and Paste Notes in the Electronic Medical Record | SYSTEM POLICY AND PROCEDURE MANUAL |
| POLICY #: 800.63 | CATEGORY: Compliance & Ethics |
| System Approval Date: 07/22/2025❖ | Origination Date: 03/16/2017 |
| Site Implementation Date: 07/22/2025❖ | Previously Reviewed/Approved: 03/2025 |
| Prepared by: Office of Corporate Compliance | Notations: |

GENERAL STATEMENT of PURPOSE

The purpose of this document is to establish that Electronic Medical Record (EMR) copy and paste functions shall be used by clinicians appropriately to enhance patient safety, minimize non-compliance and ensure the data is accurate and current at the time the information is recorded.

POLICY

It is the policy of Northwell Health that all copied and pasted information within the electronic medical record must be verified prior to final submission.

SCOPE

This policy applies to all Northwell Health employees, as well as medical staff, volunteers, students, trainees, physician office staff, contractors, trustees and other persons performing work for or at Northwell Health; faculty and students of the Donald and Barbara Zucker School of Medicine at Hofstra/Northwell or the Hofstra Northwell School of Nursing and Physician Assistant Studies conducting research on behalf of the Zucker School of Medicine on or at any Northwell Health facility; and any other Affected Individual.

DEFINITIONS

Addendum: An entry to a medical record to provide additional information after the original document has been authenticated or signed by a provider. The entry should be documented as an “Addendum,” and include the current date, time and signed by the provider.

Affected Individuals: “Affected Individuals” is defined as all persons who are affected by Northwell Health’s risk areas including, but not limited to, Northwell Health’s employees, the chief executive and other senior administrators, managers, medical staff members, contractors, agents, subcontractors, independent contractors, and governing body and corporate officers.

Copy and Paste: While documentation may exist where it is worded exactly like previous entries, “Copy and Paste” typically refers to medical record documentation that has been copied and pasted, copied forward or cloned from another source location. Consequently, copied and pasted documentation may not accurately reflect current information which is specific to the patient encounter being documented. One or more of the following functions may be used within an EMR to clone:

1. Copy and paste;
2. Copy forward;
3. Save note as a default template;
4. Use of boilerplate;
5. Any other function that allows an individual to copy information from one patient visit note to the current visit for either the same or a different patient.

PROCEDURE

According to the Centers for Medicare and Medicaid Services (CMS), whether documentation is a result of an EMR, pre-printed templates, or handwritten documentation, inappropriately cloned documentation will be considered a misrepresentation of the medical necessity requirements for coverage of services, due to lack of specific individual information for each unique patient. Clinicians must recognize that every patient is unique and must be sure that the services provided are documented distinctly from all other visits or patients.

Utilizing defaulted documentation also may cause a provider to overlook significant new findings that may result in safety/quality of care issues, as well as denial of services for lack of medical necessity.

In order to protect and enhance patient safety, clinical documentation, regardless of how it is created, must be accurate, reliable, and timely. The time-saving efficiencies of reusing information in the electronic environment through copy and paste to document complex medical conditions can ensure completeness of encounter documentation and generally produces fewer transcription errors.

Acceptable Practices

While there can be value to the selective and careful copying of information within a patient’s medical record, copying and pasting shall be done selectively and thoughtfully and with the goal of producing a clear, useful and accurate patient note. When used appropriately, it reduces errors of omission in transcription and minimizes inclusion of incorrect information. Northwell Health standards for electronic documentation include:

1. Entries shall be accurate, relevant, timely and complete.

2. Clinician entries must accurately reflect the clinical work performed on each separate date of service. The clinician signing the note acknowledges their responsibility for the accuracy of the content of that note including any copied and pasted information. Notes will be reviewed and signed according to *Northwell Health Policy #800.20 - Physician Signature Requirements*.
3. Applicable lab, pathology and radiology results shall be summarized in clinician documentation, or have interpretation of portions copied.
4. Any entries made in error shall be modified in accordance with Northwell Health Policy.

Unacceptable Practices

Although clinicians may utilize “Copy and Paste” as clinically appropriate, the following are prohibited practices:

1. Copying and Pasting documentation without verifying, editing and/or updating as appropriate.
2. Copying and Pasting inaccurate or outdated information that may adversely impact patient care and reimbursement.
3. Propagation of false information.
4. Copying and Pasting inconsistent progress notes.
5. Not identifying when the documentation was created.
6. Copy and Pasting in the EMR without noting the original author (unless the author is yourself), date and time of entry.

Non-Compliance and Auditing

Any misuse of Copy and Paste or Copy Forward shall be reported to the Office of Corporate Compliance.

The Office of Corporate Compliance will periodically monitor, measure and assess the EMR for documentation integrity and ensure that copied documentation follows all appropriate organizational, state, and federal requirements.

REPORTING AND ENFORCEMENT

All violations of this policy shall be reported to the appropriate manager/supervisor/director or to the Office of Corporate Compliance (516-465-8097) for appropriate resolution of the matter. The HelpLine is available 24 hours a day, seven days a week at (800) 894-3226 or online at www.northwell.ethicspoint.com, is accessible to all Affected Individuals and allows for questions regarding compliance issues to be asked and for compliance issues to be reported. Reports of potential fraud, waste and abuse and compliance issues also may be made directly to the Chief Corporate Compliance Officer or designee in person, in writing, via email, mobile device via a

QR code, or by telephone. All reports received by the Office of Corporate Compliance are investigated and resolved to the fullest extent possible. The confidentiality of persons reporting compliance issues shall be maintained unless the matter is subject to a disciplinary proceeding, referred to, or under investigation by Medicaid Fraud Control Unit, U.S. Department of Health and Human Services (HHS), Office for Civil Rights, HHS, Office of Inspector General Office of Medicaid Inspector General or law enforcement, or disclosure is required during a legal proceeding, and such persons shall be protected under Northwell Health's policy for non-intimidation and non-retaliation. Violations of this policy will be subject to disciplinary action as outlined in the Human Resources Policy and Procedure Manual and *Northwell Health Policy #800.73 – Compliance Program Disciplinary Standards for Non-Employees*.



REFERENCES to REGULATIONS and/or OTHER RELATED POLICIES

- Northwell Health Policy #800.20 Billing Provider Signature Requirements
- Northwell Health Policy #200.13 Patient Request for Medical Record Amendment
- Northwell Health Policy #200.14 Modifications in the Medical Record
- Joint Commission Standard RC.01.02.01
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- OMIG Compliance Program Guidance, Title 18 NYCRR § 521 – Fraud, Waste and Abuse Prevention (March 28, 2023)
- Northwell Health Policy #800.73 – Compliance Program Disciplinary Standards for Non-Employees
- Northwell Health Human Resources Policy and Procedure Manual, Part 5-3 – Workforce Conduct – Progressive Discipline

CLINICAL REFERENCES/PROFESSIONAL SOCIETY GUIDELINES

- ECRI: Safe Practice Recommendations for Copy and Paste

ATTACHMENTS

N/A

FORMS

N/A

| <u>CURRENT REVIEW/APPROVAL:</u> | |
|---|-------------|
| Service Line/Department Review | 07/03/2025 |
| Northwell Health Policy Committee | 07/22/2025❖ |
| System PICG/Clinical Operations Committee | 07/22/2025❖ |

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