

PRACTICE DIRECTIVE #21

E-FILE GUIDELINES UPDATE

REPLACES E-FILE GUIDELINES IN PRACTICE DIRECTIVE #17

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 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 changes necessitated several enhancements to the E-File system, which were included in the latest E-File update on November 23, 1998. The E-File enhancements help ensure that the Board is appropriately adhering to the FIPPA requirements. Practice Directive #21 details the revised E-File guidelines to staff for performing such functions as moving, copying and deleting documents and Memo log entries. **This practice directive replaces the previous E-File guidelines contained in Practice Directive #17.**

Document Guardian:

The Document Guardian and his/her designates, are responsible for the physical deletion of documents and Memo log entries from the E-File system. The position identified as the Document Guardian is the Manager, Compensation Services (Operations Department). The Document Guardian designates include the Manager, Operations (Operations Department), and the Operations, CRT and Mailroom 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.

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- 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 and Claim 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 file.

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 file, 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 file.

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

There is no move function for Memo log entries. In order to move an incorrectly placed Memo log entry, the E-File user must copy the Memo log entry to the correct claim file and then request a physical delete of the original Memo log entry.

2. Removal of E-File Documents and Claim Log Entries – Request Physical Delete

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

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

- documents or Memo log entries unrelated to the claim in which they are located;
- documents or Memo log entries which are not required for the adjudication or management of the claim;
- documents, Memo 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 into the claim file rather than the final version;

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- documents or Memo log entries containing information unrelated to the claim file; and
- documents or Memo 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 or Memo log entries that will not be deleted include:

- duplicate documents or Memo log entries;
- documents or Memo log entries which have been distributed outside of the Board; and
- documents or Memo 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 that should not be part of a claim file is identified, the E-File user must:

- i. Review the Claim log for any Memo log entries which are linked to the document(s). Remove any such link(s). If these links are not removed, all Memo log entries which have been linked to the physically deleted document(s) will be automatically deleted.
- ii. Add an annotation to the document. The annotation must include the reason for the requested deletion and must not obscure any text portion of the document.
- iii. Select the request physical delete function to remove the document. To ensure that the correct document is deleted, the e-file user requests the physical delete of the document **from the image viewer** with the document displayed in it.

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

Where a Memo 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 Memo log entry that contains the document reference. The guidelines for requesting a physical delete of part of a Memo log entry are discussed in 3c.

3. Partial Deletion of E-File Documents and Claim 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 Memo 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:

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- i. Annotates the document giving the reason for the requested deletion. E-File users must ensure that the annotation is adjacent to the requested deletion section so that it can also be removed by the Document Guardian prior to re-scanning the document.
- ii. “Highlights” the portion of the document that is to be removed (using the annotation toolbar yellow highlighter).
- iii. Selects the request physical delete function to remove the document. To ensure that the correct document is deleted the e-file user requests the physical delete of the document **from the image viewer** with the document displayed in it.

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

It may also occur that a document is scanned into E-file that includes information pertaining to another claim. In this case, the E-File user:

- i. Annotates the document, indicating:
 - the section to be placed on the correct claim and deleted from the original.
 - the claim number of the correct claim and whether it is electronic or paper based.
- ii. Places the annotation in a location that does not obscure any information and allows for easy removal.
- iii. Requests physical delete of the document **from the image viewer** with the document displayed in it.

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

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

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

4. Copying E-File Documents and Claim Log Entries

Documents and Memo 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 or Memo 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 Claim 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 or Memo log entry from view. Using the mark as duplicate function in E-File does not permanently delete the document or Memo log entry from the WCB database. E-File users can use the “remove mark as duplicate” function to retrieve the document or Memo log entry at any time.

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

Policy Items #99.23A and 99.23B of the RSCM outline 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 file. 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 Field Investigations so that it can be investigated and verified. If the information is considered accurate, the Field officer 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 field officer, 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 Field Investigations has had the opportunity to investigate and verify the

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

information.

Board staff receiving unsolicited anonymous information by telephone must:

- i. Complete the Anonymous Information Form, which is contained in Compensation Services Forms.
- 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 Field 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, however, the information is considered irrelevant, it will then be destroyed.

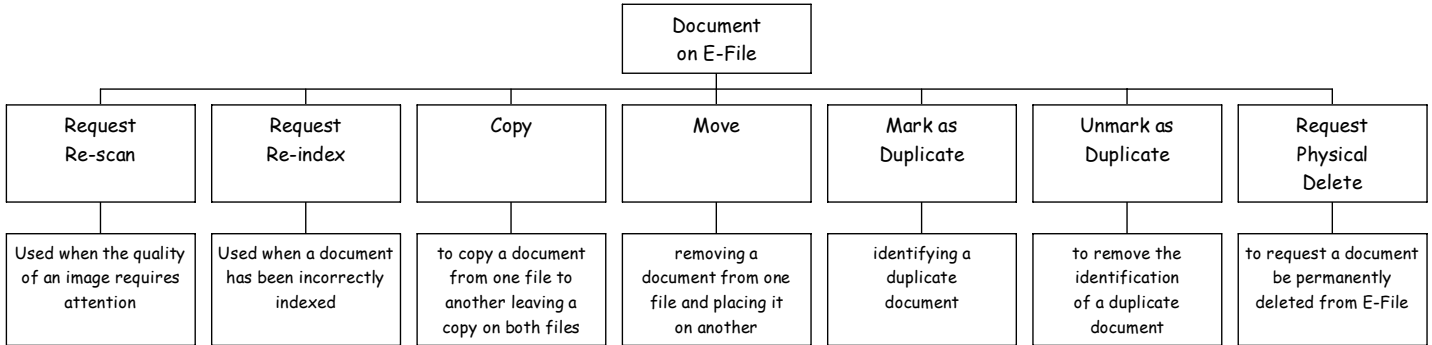
If unsolicited or unsubstantiated anonymous information is inadvertently placed on the E-File claim, the Case Manager or other Board officer administering the file must request its removal in accordance with E-File Guideline #2, Request Physical Delete.

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 could come to the Board 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 files which they have a valid business reason for reviewing.***

Managing Documents On E-File - Options (Practice Directive #21)



Managing Claim Log Entries on E-File - Options (Practice Directive #21)

