



## Grateful Patient Data Management Standards for Hidden Records

Updated 3/23/2018

1. All changes to hidden records, including deactivating, merging, adding, changing, and deleting records, will be made by UDO staff **with Grateful Patient permission** only, to ensure the integrity and protection of PHI.
  - A. Exception – When processing a gift on a hidden record, Medical Foundation staff will follow the usual standards for updating constituent demographic information and contact information, while also following the standards below.
2. No Grateful Patient language will be used in anything, except Fundraiser Notes, which are protected on the Patient Data tab. This includes interactions, change/add requests, **plan names**, etc. Hidden records can become visible, so Grateful Patient language can become exposed if it is not on the Patient Data tab.
3. Visibility
  - A. **Hidden records are made visible in an overnight global change if they have the following triggers:**
    - **making a gift,**
    - **receiving spouse or third-party recognition credit,**
    - **becoming an acknowledgee on a tribute,**
    - **registering for an event,**
    - **joining the GAA,**
    - **having a prospect plan added other than a qualification plan,**
    - **or being merged into a visible record because they are found to be a duplicate.**
  - B. When a hidden record is made visible:
    - Any relationship or employment information in the Fundraiser Notes needs to be added as actual relationships in Davie, and the Fundraiser Notes will remain intact for historical purposes. **(See the Relationships section of this document for more information.)**
  - C. If a record is made visible in error:
    - i. Correct the error:
      - revenue (zero out but don't delete)
      - **spouse or third-party recognition (delete the recognition)**
      - **acknowledgee (remove the person as an acknowledgee from the tribute)**
      - event and membership (delete the event or membership, and delete the payment)
      - plans (delete the plan, rather than change the plan type)
    - ii. Remove any relationships that may have been added to the record.
    - iii. Run the visible-to-hidden global change, **which will also send a file to iModules to request deletion of the record.**
    - iv.
    - v. Notify the Davie Privacy Administrator.
4. Relationships
  - A. Hidden records will not be related to any other record.

- B. Exception – Recognition credit on the hidden record is requested by a third party.
  - Recognition credit types of Spouse, Spouse Third Party, and Self Third Party trigger a record to become visible. (See the Visibility section of this document for details on visibility triggers.)
  - It is acceptable to relate the record to another record while adding the spouse/third party recognition if we receive their information from the gift, which is a source other than Epic.
  - If such a record is included in a batch, or in a gift greater than \$5000 that needs review, gift processors will note the batch or the transaction as “urgent review,” in order to expedite processing and minimize the time a hidden record is related to another before it becomes visible.
- C. Employment or other relationship information that does not have to do with recognition credit needs to go in the Fundraiser Notes area until the record is made visible. Once visible, the relationships can be made official.

## 5. New record requests

- A. Patients referred to the Medical Foundation by a physician need to remain hidden.
  - i. Medical Foundation research staff will check for the record in the Opt-out table. If the record is found, no new record request will be submitted.
  - ii. Medical Foundation staff will add new hidden record requests to the Add New Hidden Record Request spreadsheet on secure network storage that is shared with UDO data entry staff.
  - iii. Medical Foundation staff will send a generic alert email to UDO staff to check for updated information and CC the Davie Privacy Admin.
  - iv. UDO staff will create the new record and check the *Create as hidden patient record* checkbox.
- B. If a new record request is made and it matches an existing hidden record:
  - i. UDO staff will create a new visible record, and
  - ii. Merge the new record with the existing hidden record, using the method listed in the Merging records section of this document.

## 6. Change requests

- A. Change requests on hidden records are processed through a separate change request queue, only accessible by those with hidden record access.
- B. Change requests on hidden or visible records cannot be based solely on Epic data but must come from another source. The Medical Foundation will channel all change requests through their own research staff before a request is made through Davie.
- C. The Relationship area of the change request form is a free-text field. Relationship requests on visible records must never include information regarding a hidden record, as these requests will be processed through a change request queue that is accessed by users who do not have hidden record access.

## 7. Merging records

- A. Only one of the records in a merge can contain patient data, whether hidden or visible.
- B. If the merge will include a hidden record:
  - The hidden record will be the Source, not the Target.
  - Use the *Standard Merge – No Email,Phone,Address* template.
- C. If the visible Target record is Inactive, the merge process will activate it. However, there are three exceptions that will be followed when merging:
  - i. Inactive Relation Only spouses
    - Return the record to Inactive status after the merge to prevent it from appearing on mailings.

- ii. Inactive due to “Constituent Request”
  - Return the record to Inactive status.
  - The record will be treated in the same way as a Grateful Patient opt-out. Medical Foundation staff will monitor a data check to process these records and add them to the Opt-out table.

iii. Deceased records

- Return the record to Inactive status after the merge to conform with data management standards.

D. Current data checks on duplicates include:

- Duplicate pairs where both contain patient data, which indicates a duplicate in Epic’s system
  - Duplicates using the same criteria as the Grateful Patient import process
  - Several checks that look at a variety of comparisons on First Name, Last Name, ZIP, DOB, and Phone
  - Potential match on spouse
    - a. Some of these duplicates involve a match on a visible relation-only spouse that does not have an address on their record, therefore Medical Foundation staff will monitor this data check and research the validity of the duplicate and the relationship by using a source external to Epic data.
    - b. Once validated, Medical Foundation staff will enter a Fundraiser Note supporting the validation and request a merge through the Davie help desk.
    - c. When merging, use the *Standard Merge – No Email,Phone,Address* template and manually add the address that was confirmed by Medical Foundation staff.
- Duplicate pairs where only one record contains patient data, which indicates a match was made after address validation occurred in Davie
  - Duplicates using the same criteria as the Grateful Patient import process
  - Duplicates on First/Last/Zip
  - Potential match on spouse (see the Epic duplicate bullet above for more information on spouse dupes)
- Once the current data checks are resolved, more data checks will be developed, starting with stricter matches, and moving into fuzzier matches, in order to keep the data as clean as possible.

E. Merge requests involving hidden records will be sent to the help desk with PIDs only.

8. Deceasing records – The deceasing information comes from Epic.

A. Visible records:

- Deceased information on visible records must be verified using a separate source, as we normally do, and the record can then be marked deceased.
- Patient Data, Referrals, Fundraiser Notes, Wealth and Ratings values must be kept, as deletion of this data could affect metrics, and the deceased information is needed in order to prevent future mailings from being sent. Further discussion may be needed if it seems appropriate to delete this data in the future.

B. Hidden records:

- UDO staff will research deceased hidden records to look for potential duplicates in Davie:
  - If a match is found, the records will be merged and then treated as a visible record, as above.
  - If no match is found in Davie:
    - We will trust the accuracy of the deceasing information from Epic, so no further research is necessary, and no obituary needs to be attached. The constituent record can be marked deceased.
  - If it is discovered that a hidden record is deceased, but there is no deceasing info from Epic, the deceasing information must be verified and documented using a separate source, as we normally do with visible records.
- If we receive a gift in memory of a deceased hidden record, we will not relate the hidden record to any other record, including the gift, a tribute, or any other constituent records.

- Estates may involve additional concerns, so these will be handled on a case-by-case basis. When an estate request is made, UDO staff will look for a deceased hidden record and contact Medical Foundation staff in order to determine how to proceed.
- This process may evolve over time.
- Emailing obituary information that identifies a hidden patient record is not allowed.

## 9. Tributes

- A. If a hidden record is the acknowledgee on a tribute, the record will become visible in the overnight global change.:
  - This also applies to instances where the hidden record is both the acknowledgee and the tributee.
- B. If a hidden record is the tributee on the tribute and NOT an acknowledgee, the hidden record will not be associated with the tribute at all.

## 10. Deleting records

- Requests for deleting hidden records may be submitted to the help desk with the following language: “Please delete <PID>.” Constituent name will not be included in the request.
- At the end of each fiscal year, after reporting is complete, we will follow the Grateful Patient Annual Delete Criteria, which includes deleting constituent and/or patient data.

## 11. Events – Hidden records may be invited to events. Since registration for an event will turn a record from hidden to visible, the following standards apply:

- A. The link to the opt-out webform must be provided on the event invitation.
- B. If a vendor is used to send the invitations, the same policies must be followed for sending out other Grateful Patient mailings, including but not limited to:
  - There must be a Data Use and Sharing Agreement in place with the vendor.
  - Mailing lists must be sent through a secure, encrypted method, such as SFTP.
- C. For events that are sponsored and managed by UNC Medicine:
  - Only Davie users with Grateful Patient access should work on the event in Davie.
- D. For events that are sponsored and managed by UNC Medicine AND non-UNC Medicine events:
  - The development officer who receives the RSVP must document the constituent’s agreement to register for the event in a Fundraiser Note, including the date and type of contact.
- E. Invitations:
  - Hidden records CANNOT be used in the Invitation list area of the events module in Davie, as there is no way to hide the records in the Invitation list area from non-Grateful Patient users.
  - If hidden records are to be invited to an event, 2 queries that include the same criteria and exclude the appropriate solicit codes will be used – one for visible records and one for hidden. The visible query can be used on the event invitations. The hidden query cannot be added to the event, but can be used independently to send the actual emails or paper mailings. NOTE: This is an exception to the rule when using Events and is to be used only for hidden records that need to be invited to events, not for any other invitees.
  - Query results that are exported from Davie and include hidden records can only be stored on secure network storage.
- F. Registration batches:
  - BBIS batches will auto-match on constituents in Davie. Each registrant and guest will be checked to verify that they are matched to the correct Davie record, to avoid matching to an incorrect hidden record.
  - Hidden records that are spouses of registrants may be added as guests if we receive enough information to confirm the hidden record is the correct record.

## 12. Import Selections

- Import selections involving hidden records should only include PIDs and no other information, as the results of the import selection are stored in Davie and can be downloaded by any user with access to the import selection area.