

**FACULTY PRACTICE GROUP – Ambulatory Operations**

STANDARDS AND GUIDELINES

**UCLA** Health System**SECTION:** Front Office Operations**SUBJECT:** Issuing Name Change Policy

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EFFECTIVE: 3/2/09

**PURPOSE**

UCLA Health System is committed to protecting the privacy and security of protected health information (PHI) covered under the Health Insurance Portability and Accountability Act (HIPAA). This policy is offered to patients who have circumstances in which they or their provider choose to expand their protection and anonymity or whose medical care either generates a significant public interest and/or presents a security risk. It ensures the confidentiality and the physical safety of these patients, other patients and UCLA Health System personnel.

**POLICY**

Support the accurate and expedient issuance of a temporary or permanent name change, adhering to the standards and processes set forth in this document and other supporting instructional documents issued by the FPG.

**DEFINITIONS****Temporary Name:**

Is the temporary assignment of a fictitious patient name, which takes the place of the patient legal name and any Also Known As (AKA) names on file, for a UCLA medical record. The UCLA patient ID number never changes and remains constant. A temporary name change is intended to serve the duration of a current treatment period and is not for long-term assignment. Issuance of a temporary name change requires an expiration date, is issued at the beginning of care or treatment, and should not be initiated mid-way after the treatment process has begun. All of the patient's UCLA records will reflect the temporary name during the activation period. After the temporary name has expired, the patient's legal name and any AKA names on file will be unmasked, and all records associated with the temporary name will be included. Appropriate examples for temporary name assignment include:

- Victims of violent crime (identified security risks) such as 1) assaults or 2) domestic violence cases.
- Sensitive medical testing being performed that requires anonymity.

**Permanent Confidential Name:**

The permanent assignment of a fictitious patient name, which takes the place of the patient's legal name and any AKA names on file for a UCLA medical record. A permanent name change ensures that the patient's identity remains confidential permanently, extends beyond their current treatment period, and does not expire. Issuance of a permanent name change is a one time event, unless circumstances for which the name change was created has been compromised or the patient requests a cancellation.

**User:**

A departmental/practice specific designee, granted access via M CCS to the ADT Encounter Registration system, and given the ability to view patient records, collect and/or verify appropriate demographic, authorization, insurance payor information, and initiate temporary name changes for all patients.

**Temporary Name Super User:**

A departmental/practice specific designee, granted access via M CCS to the ADT Encounter Registration system, and given the ability to perform temporary name changes, extend expiration dates of temporary naming conventions, and are able to view the patient legal name and any associated AKAs.

**Permanent Name Super User:**

A limited number of FPG specific designees given the ability to create permanent name changes and are able to view the patient's legal name. Access is granted by the Director of Ambulatory Operations or the Director of Admissions and Registration in partnership with M CCS.

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**TEMPORARY NAME CHANGE STANDARDS AND PROCESSES**

Procedural steps should be initiated to ensure that confidentiality is provided and medical records are modified appropriately and accurately. Administrative staff should abide by the standards and processes set forth and the system instructional materials provided by the FPG. Before initiating the process, the patient should first receive and read an introduction letter to verify interest in this service. If after reading this letter the patient wants to proceed, the practice manager should be notified to initiate the request in a private setting.

**Name Change Process:**

1. **Initiating the Change and Setting the Term Date:** the initiating practice should verify the desired fictitious temporary name, the term date (up to 30-days), and ensure that the issuance of the temporary name is beginning at the start of care or treatment and not mid-way after the treatment process has begun. Once the process is completed, the legal name will be suppressed and stored under the AKA Data screen until the term date expires—the legal name or any associated AKAs cannot be viewed or used to complete the patient ID/name search process (unless performed by a Super User). If a non-authorized user attempts to add an AKA to the temporary name medical record, the request will be denied and the AKA screen will not be triggered/accessible until the term date expires.
  - 1.1. **Setting the Term Date:** The term date is set for up to a 30-day period from the date of activation. During the term date, only designated super users can view/update/delete the temporary name data fields.
    - After the set term date expires, the patient’s medical record name and any AKAs will revert back automatically. The medical record will include records during the temporary name change period.
  - 1.2. **Extending the Term Date:** The term date can be extended via the designated Super User, before it expires, by accessing the term date field on the Patient Basic Data screen (using function A1 or function A4). The term may be extended for up to 30-days from the date you initiate the change.
    - Extensions must be initiated by the patient and arranged in advance or done prior to the agreed termination date.
    - If the temporary name expires, it can be established again by completing a new encounter process (see step 2); only function A3 can be used to set a new temporary name.
  - 1.3. **Deleting the Term Date:** The term date can be removed via the designated Super User, by accessing the term date field on the Patient Basic Data screen (using function A1 or function A4). The term date fields must be cleared (using the spacebar or backspace keys). Upon completion, the Temporary Name Removal Consent screen displays; print the form (in English or Spanish) and process it by adhering to the same standards/procedures outlines for the Temporary Name Consent form (step 3).
2. **Encounter Process (Function A3):** using the outpatient Encounter (A3) function, the designated user will register the patient, assigning the new temporary name.
  - Function A1 Add/Update Patient ID Info and function A4 Encounter Update are NOT PERMITTED to initiate a temporary name change for existing patient records.
  - Function A1 Add/Update Patient ID is required for first-time UCLA patients in order to establish the legal name record before modifying the name. In this case, the user should first create the ID and complete the patient demographics using function A1; then return to the Master Screen to select function A3, search for and select the existing record, then modify the name and complete the encounter visit record.
  - 2.1. If an encounter visit record has already been processed with the patient’s legal name, this encounter must be deleted and replaced with a new one noting the new temporary name assignment.
  - 2.2. Patient Data Search requires the user to search for the patient medical record using the legal name and then select the record on file.
  - 2.3. Patient Basic Data, Name (Last/First) requires the user to change the legal name to the new fictitious temporary last, first name.

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- 2.4. Patient Basic Data, Temp Name? (Y, ): a new field that requires the user to note **Y** to indicate the changed name is for temporary assignment. *If this field is overlooked, the legal name will be erased from the file and replaced with the temporary name.*
- 2.5. Patient Basic Data, Term Date: a new field that requires the user to record the temporary name expiration date (MMDDYY) when answering yes for temp name?
- Date cannot exceed 30-days from the encounter *creation* date; maximum duration is not associated with the encounter service date.
  - Date can be extended as needed in 30-day (or less) increments from the system (access) date—in other words, the day you access the record to update the term date is the start date for the 30-day term.
- 2.6. Temporary Name Consent Document: a new screen that auto-displays to initiate the printing of the consent form for patient signature and file processing. The consent will print in either English or Spanish.
- 2.7. Payor Data, Subscriber Name: requires the patient’s LEGAL NAME as indicated on their insurance card. *DO NOT use the temporary name in this field.* This field information passes to the billing system, but is suppressed from all users view (with exception to super user assignment) once processed.
- Users can add the patient’s legal name as it is noted on the insurance card when creating the encounter or when updating the encounter record if it was not previously documented.
  - Only Super Users (with this access level) can view the patient name field for the insurance card once established using functions A3, A4, or A6.
  - Only Super Users (with this access level) can modify or delete existing patient name field data for the insurance card using functions A3 or A4.
- 2.8. Encounter Data: a registration packet and labels should be printed with the temp name.
3. **Change of Name Packet**: the practice manager (or designated representative) should provide the patient with the *Change of Name* packet which includes:
- Patient Letter: Introduction (either the [temporary](#) or [permanent](#) version)
  - Form: Name Change Consent (via ADT Encounter Registration)
  - Card: Confidential Name Change ID (completed by the practice). [Avery Business Card template 3672](#) or [8877](#).
- 3.1. Processing the Consent Form: the printed consent form **MUST** be read and signed by the patient using their legal name, and then signed by the practice witness.
- One copy of the signed consent form will be provided to the patient.
  - The original copy will be placed in the patient’s medical record chart (see Medical Records for details on processing based on who is responsible for the official medical record).
- 3.2. The terms of expiration and date extension should be reviewed with the patient.
- 3.3. The conditions of care relative to using the temporary name or patient ID number during ANY treatment at UCLA, during the agreed time, should be verified;
- It will be at the patient’s discretion as to whether they share their legal name with any clinical area.
  - ALL ancillary tests and appointments will be made under the temporary name during this period.
  - If the patient needs to be admitted into one of our UCLA Hospitals during this period, the patient must be aware that records will/may be under the temporary name. The patient must advise admitting personnel of this so that pertinent medical information can be made available for their healthcare needs.

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The logo for UCLA Health System, featuring the text "UCLA Health System" in a blue and white color scheme.**SECTION:** Front Office Operations**SUBJECT:** Issuing Name Change Policy

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**Medical Records:**

The Medical Record process will be handled according to who is responsible for the “official” medical record. If the patient is being seen in a practice where the official medical record is kept on site – the following procedures must occur:

1. The Consent Form will be added to the front of the patients chart to reflect the patient’s temporary name. Since this is a *temporary name* change, DO NOT delete the patient’s legal name on chart.
2. Charts with temporary names will be filed in a separate area, tracking them by term date and/or patient name, to ensure these charts are reviewed on a routine basis.

If the patient is being seen in a practice where the official medical record is maintained by HIMS:

1. The initiating practice sends the original signed copy of the Consent Form to HIMS by inter-office mail (or campus mail) double sealing the consents for confidentiality purposes. Send to:

Janet Hoffberg, RHIA  
Director, HIMS/eHIMS  
UCLA Health System  
10833 Le Conte Avenue, BH-921 CHS  
Mail Code: 177620

2. HIMS will update the official medical record to reflect the patients’ temporary name.

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**PERMANENT NAME CHANGE STANDARDS AND PROCESSES**

Procedural steps should be initiated to ensure that confidentiality and that medical records are modified appropriately and accurately. Only designated individuals have access to create a Permanent Name Change. Before initiating the process, the patient should first receive and read an introduction letter to verify interest in this service. If after reading this letter the patient wants to proceed, the practice manager should help facilitate the process by contacting the appropriate individuals.

**Name Change Process:**

1. The initiating FPG outpatient practice should contact Ambulatory Operations to begin the process by sending an email request to [FPGAMBULATORY@MEDNET.UCLA.EDU](mailto:FPGAMBULATORY@MEDNET.UCLA.EDU).
2. Ambulatory Care, Admissions, and HIMS will work collaboratively to assure the name has been changed correctly and departments that have a need to know are contacted.
3. Procedures to initiate the change in ADT Encounter Registration will be completed by the designee, and all patient records/consent forms signed and processed (accessible to the Director of HIMS or designee).
  - 3.1. Any of the following functions can be used to access the Patient Basic Data screen to initiate a permanent (confidential) name change:
    - Add/Update Patient ID Function A1
    - Encounter Function A3
    - Encounter Update Function A4
      - For first-time UCLA patients, Function A1 is required in order to establish the legal name record.
      - In this case, the user should first create the ID and complete the patient demographics with the legal name; then return to the Master Screen and select either function A1 to change the name or function A3 to change the name and initiate an encounter visit.
  - 3.2. If an encounter visit record has already been processed with the patient's legal name, this encounter must be deleted and replaced with a new one noting the new permanent name assignment.
  - 3.3. Patient Data Search requires the designee to search for the patient medical record using the legal name and select the record on file.
  - 3.4. Patient Basic Data, Name (Last/First) requires the designee to change the legal name noted to the new fictitious permanent last, first name.
  - 3.5. Permanent Confidential Name? (Y, ): a new field that requires the user to note **Y** to indicate the changed name is for new permanent assignment.
4. Confidential Consent Document: a new screen that auto-displays to initiate the printing of the consent form for patient signature and file processing. The consent will print in either English or Spanish.
5. The designee must inform the patient about the terms and conditions of use, noting the new permanent name is required each time they seek ANY service at ANY UCLA facility.

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**REPORTS****Temporary Name Report, Westwood DTTWPN3E**

This report will be generated weekly through RSD with setup by MCCA Security via Financial Systems/IT. It is the responsibility of the initiating practice manager (or designee) to review this report to determine if the temporary name change is close to term and if any extension is required. Unless the term date is extended/modified, the Temporary Name Change will expire and the patient legal name will revert back on the day after the expiration date (sometime after midnight). The patient must be involved in the decision making process to extend the term date.

**Temporary Name Removed, Legal Name Restored Report**

This report will be generated weekly through RSD with setup by MCCA Security via Financial Systems/IT. It should be reviewed by the practice manager (or designee) to provide additional insight to temporary name expirations/changes.

**Permanent Confidential Report, Westwood DTTWPN2E**

This report will be generated monthly through RSD with setup by MCCA Security via Financial Systems/IT. Designated FPG representatives responsible for permanent confidential name changes will be on point to review and respond to report data.

**REQUESTING SUPER USER AUTHORIZATION**

Access to the ADT Encounter Registration system is granted by MCCA via a mainframe user ID request or update that is issued by the departmental authorizer. Financial Systems/IT determines the master screen access levels and coordinates any required super user access with the requesting department and MCCA. These requests are typically processed within 2-3 business days.

**Temporary Name Change Super User Access:**

The designated [request form](#) should be completed and submitted to FPG Ambulatory Operations for outpatient practices, which will then be processed with Financial Systems/IT and MCCA. Allow an additional 1-2 business days for this type of access approval. Note that Permanent Name Change Super User Access is issued by the Director of FPG Ambulatory Operations to a limited number of FPG designees assigned to process those types of changes.

**Process:**

1. To obtain the request form online from the FPG web site under Standards and Guidelines, [click here](#):
2. Complete the form and submit it to FPG Ambulatory Operations by scanning/emailing to [FPGAMBULATORY@MEDNET.UCLA.EDU](mailto:FPGAMBULATORY@MEDNET.UCLA.EDU) or faxing to 310-794-7588.