


GUAM BEHAVIORAL HEALTH AND WELLNESS CENTER		
TITLE: Storage of Closed Consumer Medical Records	POLICY NO: ADMR-05	Page 1 of 3
RESPONSIBILITY: Records of Care		
APPROVED BY:  DIRECTOR	EFFECTIVE: DEC 12 2017	
	LAST REVIEWED/REVISED:	

PURPOSE:

To ensure closed consumer medical records are systematically identified and processed for long term storage in a secured area with controlled access.

POLICY

- A. Guam Behavioral Health and Wellness Center maintains a secure Medical Records Unit that retains, file and store all its consumer's medical records in accordance with the Agency, Government of Guam and Health Insurance Portability and Accountability Act. 1996 (HIPAA 1996) requirements. It also maintains a 2-lock mechanism Medical Records Storage Annex (MRS Annex) restricted to the Director or designee and medical records staff, for all medical records that has been identified as inactive.
- B. Appropriate steps shall be taken to safeguard the Protected Health Information (PHI) during transport of medical records from MRU to MRS Annex and ensure GBHWC remains HIPAA compliant.
- C. All closed inactive consumer records shall meet the following criteria prior to storage in the Records Storage Annex;
 - a. Closed adult consumer records will have a waiting period of no activity for 7 years before being moved to the MRS Annex (last entry date being 7 years ago or longer).
 - b. Child consumer records closed before the child reached the age of 18 will be moved to storage 5 years after reaching the age of majority.
 - c. Medical records of deceased consumer will be moved to storage 1 year after medical record closure.
 - d. Healing Hearts records upon closure will be subject to applicable criteria as stated in a., b., or c.

DEFINITIONS:

Closed Consumer Medical Record: A medical record of consumer that has been discharged from any of the GBHWC program and is not receiving any services. (refer to Medical Chart Closure Policy)

Medical Record: the "medical record" is a documentation of all health care services is considered to include identification sheet/face sheet; consent to release; legal documents; referrals/consultation; applicable school and other documents; progress notes; treatment and other applicable plans; applicable administrative documents; medication record; applicable

medical documents; assessments; discharge information; certifications and other applicable documents.

Protected Health Information (PHI): individually identifiable health information that is transmitted or maintained in any form or medium, by a covered entity, health plan or clearinghouse as defined under the Health Insurance Portability Accountability Act (HIPAA), 45 CFR Part 160 and 164

PROCEDURE:

Identification of closed consumer records for transport and storage:

1. Annually, Medical Records staff will review all closed cases in the Medical Records Mega Records repository to identify all closed consumers meeting the requirements for storage in the MRS Annex.
2. The identified records meeting the requirement for storage, will be placed in storage boxes along with a list of the content of the box.
3. The closed records will be organized alphabetically. The boxes will be labeled numerically and indicating month and year the box was created. EXAMPLE: Box #1, 06/2017.
4. Medical Records staff will also indicate the location of the closed record in the Mega Record repository and in the card catalogue. EXAMPLE: Jane Doe. Record located in Box # 1, 06/2017.
5. Medical Records staff will notify Maintenance Supervisor to schedule the transport of storage boxes to the MRS Annex.
6. Medical Records staff will notify GBHWC Director of the forthcoming relocation of records.

Transferring closed consumer records to MRS Annex:

1. Medical Records staff will ensure that each storage box is tightly covered so that no personal identifiers are visible when moving boxes and PHI in the records use procedures that minimize exposure. EXAMPLE: all documents in the individual records are fastened and there are no loose documents.
2. Medical Records staff will accompany maintenance staff to the MRS Annex to direct where boxes should be placed.
3. Access to MRS Annex will require the GBHWC Director or designee and Medical Records staff.
4. Boxes will be placed according to the label of the box number, month and year.

Retrieving closed consumer records from MRS Annex:

1. Upon notification that a record is needed from MRS Annex, Medical Records staff will determine the location of the box the record is in.
2. Medical Records staff will notify the Director or designee of the need to retrieve the record and proceed to the MRS Annex.
3. If records are removed for the purpose of review to release information, once task is completed, records will be return to the box it was retrieved from.
4. If records are removed for the purpose of providing treatment, Medical Records staff will strike out the consumer name on the list in the box and indicate date it was removed and

initial the date. Medical Record staff will also update the Mega Records and card catalogue to reflect the change of consumer status.

Medical Records Consumer Census Reports:

Medical Records received daily consumer census from the adult and children inpatient units and the residential programs. These are considered secondary source of information and will be destroyed after a waiting period of 3 years from date of creation.

REFERENCE(S):

RELATED POLICY (IES):

Records and Retention Disposition Schedule: Memorandum 88-1560

SUPERSEDES: Title: Storage and Retention of Consumer Records; Policy No.: ORG-REC/C-7-1; Effective Date/signature date: 9/30/1991; Approving individual's name: Marilyn Wingfield, DMHSA Director

ATTACHMENT(S):

**GUAM BEHAVIORAL HEALTH AND WELLNESS CENTER
REVIEW AND ENDORSEMENT CERTIFICATION**

The signatories on this document acknowledge that they have reviewed and approved the following:

Policies and Procedure

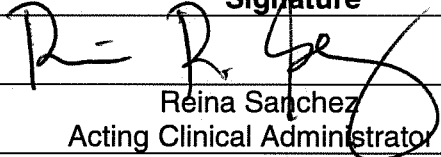
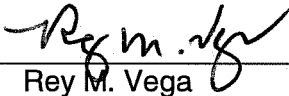
Submitted by: Quality Management

Protocol/Form

Policy No: ADMR-05

Bylaws

Title: Storage of Closed Consumer Medical Records

<input type="checkbox"/> Reviewed <input type="checkbox"/> Endorsed Title	Date	Signature
	DEC 12 2017	
	Name Title	Reina Sanchez Acting Clinical Administrator
<input type="checkbox"/> Reviewed <input type="checkbox"/> Endorsed Title	Date	Signature
	DEC 12 2017	
	Name Title	Rey M. Vega Director