

**<u>POLICY NAME</u>: RECORDS POLICY <u>POLICY AREA:</u> Compliance** 

<u>CQI POLICY #: 1.E.3.</u> <u>DATE ADOPTED:</u> 9/1/2019

# **INTRODUCTION:**

The purpose of this policy is to accurately and efficiently process records requests in accordance to HIPAA standards and to ensure that Client and business records are protected and that confidentially is not breached.

# **POLICY:**

It is the policy of Welcome Home, Inc. to process requests for records in a timely manner while protecting the confidentiality of those we serve. Client records will be retained for at least seven years. Records will be stored in a locked file cabinet in a locked office.

### **OPERATIONAL GUIDELINES:**

### **Records Requests:**

- 1. Records request will be processed in a timely manner, at least within 10 days.
- 2. Release forms must be checked for the following information before they can be processed:
  - Name of Program/Individual making the disclosure, Name of Program/Individual receiving the disclosure, Name of Client, Purpose of Disclosure, Information that will be disclosed, Statement that client may revoke the consent at any time, Date or condition upon which the consent expires if not previously revoked, Signature of client, Date consent is signed
- 3. Look the individual up in HMIS to find their status and their participation dates.
- 4. If the information is not in the system, you may be required to get the paper chart. Paper charts may only be kept for seven years.
- 5. Once information has been gathered make a copy of the request to mail with our documents. On the original request form write number of pages mailed and the date they were mailed.
- 6. Place copy of request along with our documents in an envelope with appropriate address and mark the envelope "confidential". Put correct postage on envelope and place in the outgoing mail. If mailing address is not available and a fax number is provided complete the fax face sheet and fax along with the documents.

## To Maintain Confidentiality:

- 1. Client Charts will be maintained in a locked room.
- 2. Active charts are kept in a locked filing cabinet.
- 3. Once a client's chart is seven years old it may be disposed of to create space for more records. All disposed records will be shredded.

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- 4. Prior to disposing of an old record, it should be checked for important documents. Copies of birth certificates, DD 214s and other important primary documents will be stored in perpetuity.
- 5. Human Resources records are kept either in a limited access partition on Sharepoint, or in a locked file cabinet in the Human Resources/Finance office. Human Resources records are maintained for seven years and for one year after termination of employment.
- 6. Business & Financial records are kept either on a limited access workstation or limited access partition on Sharepoint, with paper documents stored in a secure file cabinet in the Human Resources/Finance office, or the file room, archive documents may be stored offsite in a secure, humidity controlled environment, in a locked cabinet. Financial records are kept for 7 years.
- 7. Welcome Home will not *share*, *sell or lease* user data for commercial or for-profit purposes.
- 8. We do not share any client data with third parties. Client personal information is kept confidential and is not disclosed to any outside organizations, except as required by law or with client's explicit consent