



Health Care Agency Behavioral Health Services Policies and Procedures	Section Name:	Information Management
	Sub Section	Clinical Records Documentation
	Section Number:	05.01.09
	Policy Status:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Revised

	SIGNATURE	DATE APPROVED
Chief of Operations Behavioral Health Services	_____	_____

SUBJECT: Document Destruction – Paper charts held in the clinics for clients discharged prior to 9/23/2003

PURPOSE:

To establish a procedure to manage the destruction of a specific set of clinical paper documents.

POLICY:

It is part of routine operations that microfiche and paper documents be destroyed after the designated time period. It is the policy of BHS that there be a standardized way to destroy the documents.

SCOPE:

This Policy and Procedure (P&P) addresses a very specific set of clinical records. For administrative reasons, a set of clinical records has been held at clinics rather than sent to the Custodian of Records (COR) for the microfiche process, or to the current scanning retention procedure which replaced the microfiche procedure. These are the records that had been closed as of 9/23/2003, the date the then-new records system, referred to as IRIS, was implemented. Because these records were already closed, they were not entered into IRIS and therefore did not have an assigned IRIS Medical Record Number (MRN). The MRN is the identifier that began to be used when BHS switched over to the system that replaced the microfiche system. As a result, neither process was applied to these records and they have been securely stored at the clinics. Most of these records have now reached the limits of the records retention policy which permit the documents to be destroyed. These records do not fit into the destruction procedure for either the microfiche or the scanned records since those are managed from the COR's office while the destruction of these records will be managed from the clinics although tracked by the COR. A special procedure must be implemented and managed to allow the local Service Chiefs at the clinics to arrange for the proper destruction and tracking of these records. Once these records have been properly destroyed, this Policy and Procedure will be retired.

REFERENCES:

Records Control Schedule 8A and 9A

FORMS:

Records Destruction Request Memo (Attached)

PROCEDURE:

- I. When paper documents meet the destruction date, based on Mental Health Retention Schedule 8A or 9A the following steps should be taken:
 - A. The Service Chief (SC) shall identify those charts that meet **all** of the following requirements:
 1. The chart was closed on or before 9/23/03, **and**
 2. No IRIS MRN has been assigned to the client, **and**
 3. The client is currently at least 25 years old.
 - B. The clinic should generate a list of the names, old MIS number and dates of birth on all of the records to be destroyed.
 - C. The Service Chief shall complete the Records Destruction Request Memo, maintaining a copy for the clinic records, and pony mail the memo to the Custodian of Records at 51-D Attn: Custodian of Records. The list of charts does **not** need to accompany the Records Destruction Request Memo.
 - D. All of the records on the list should be placed into a box with a top. **No protected health information (PHI) should be visible from the outside of the box.**
 - E. The COR will coordinate the shredding pick up with the shredding company and the clinic.
 - G. The shredding company will come to the clinic, pick up the charts and the clinic will note the destruction date on the Records Destruction Request Memo.
 - H. The clinic will retain the Records Destruction Request Memo and keep it with the client list. The clinic will mark the client list as “Destroyed”.
 - I. The clinic will send a copy of the list and the Records Destruction Request Memo to the COR.

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Sample Record Destruction Request Memo

From:

To: Orange County Health Care Agency, Custodian of Records (PONY 51-D)

Date:

In accordance with HCA/BHS Policy and Procedure # 05.01.09 Document Destruction – Paper charts held in the clinics for clients discharged prior to 9/23/2003, this is notification to the Custodian of Records Office that this clinic has paper charts ready for destruction as described in that P&P.

Number of boxes of charts ready to be destroyed:

Number of charts contained in those boxes:

Please arrange to have the contracted shredding company come to the clinic to pick up the documents to be shredded.

Clinic location:

Clinic Name:

Address:

Any special directions to assist the driver in locating the clinic?:

Contact information for Custodian of Records office to notify the clinic of the date/time that the contracted shredding company will be on site is:

Service Chief:

Office Supervisor:

Phone #:

In accordance with the P&P, this clinic has prepared a full list of the charts to be destroyed. This list includes:

Client name, client MIS number, client date of birth

In accordance with the P&P, the list of charts destroyed and a copy of this memo will be attached to the receipt given by the contracted shredding company on the date of the pick-up. The receipt and list will be maintained at the clinic.