

HIPPA Requirement for Records Management

Policy:

1. Patient's records are retained in accordance with all applicable laws, regulations and this policy.
2. All employees and agents are responsible for maintaining the records that are created, used, maintained, preserved and stored in accordance with this Records Management policy.
3. Records will be managed responsibly and retention/destruction schedules and procedures/methods will be developed applicable to the type of record and according to State and Federal law.
4. Vital and official records will be retained and protected to allow continued operations in the event of a natural or man-made disaster.
5. Records containing confidential and proprietary information will be securely maintained, controlled and protected to prevent unauthorized access.
6. All records generated and received by Altus Healthcare Management Services are the property of Altus Healthcare Management Services. No Altus Healthcare Management Services employee, by virtue of their personal or propriety right to such records even though he or she may have developed or complied them
7. Unauthorized destruction, removal or use of such records is prohibited.
8. No one may falsify or inappropriately alter information in any record or document.
9. The Administrator delegates responsibility to Department Managers for implementing and maintaining Altus Healthcare Management Services records management program in each or their assigned areas in accordance with this policy.
10. Information pertaining to unauthorized removal, use of, and/or destruction of Altus Healthcare Management Services records or regarding intentional falsification/alteration of information in a record or document should be reported to the Administrator.

Process:

Section I General

1. **Definition of Records:** A record is recorded information, regardless of medium or characteristic that can be retrieved at any time. It includes all original documents, papers, letters, x-rays, cards, books, maps, photographs, blueprints, sound or video recordings, microfilm, magnetic tape, electronic media and other information recording received in connection with transacting its business and are related to Altus Healthcare Management Service's legal obligations. If not stipulated otherwise, this is the record to which retention schedules apply. Company business records include: but not limited to, letterhead correspondence, legal opinions, real estate documents, directives and policies, official meeting minutes, personnel records, benefit programs, purchasing requisitions and invoices, accounts payable and receivable documents, tax documents, reimbursement documents, completed and signed

forms, contracts, insurance documents, general ledgers, audit reports and financial reports. Medical or patient records include: clinical data as well as patient demographic, clinical research, and financial data. Records can only be discarded when the specified retention period has expired.

2. **Definition of Non-Records:** Non-records material includes duplicate copies of correspondence, duplicate copies of records stored for short-term reference purposes, blank forms, stacks of publications, magazines, and publications from professional organizations, newspapers, public telephone directories and transitory messages used primarily for the information communication of information. Transitory messages do not set policy, establish guidelines or procedures certify a transaction, or become a receipt. Transitory messages may include not are not limited to, e-mail messages with short-lived or no administrative value, voice mail, self-sticking notes and telephone messages.
3. **Records Storage:** Altus Healthcare Management Services may contract with commercial off-site storage facilities to store, control, and protect inactive records. To the extent that they have access to Altus Healthcare Management Services records, the commercial off-site storage facilities must agree to securely transport and maintain the confidentiality of Altus Healthcare Management Services records. All storage facilities are to be in secure locations that safeguard the records from the following: ordinary hazards, such as fire, water, mildew, rodents and insects; man-made hazards, such as theft, accidental loss, sabotage, and commercial espionage; disasters such as fire, flood, earthquakes, hurricanes, wind, and explosions; and unauthorized use, disclosure, and destruction.
4. **Microfilm Storage:** The use of film media for records storage and retention purposes is to be selective and ensure cost effectiveness. Film media includes microfilm, microfiche, computer output microfiche/microfilm, or other similar types of media.
5. **Record Retention Schedules:** All records will be maintained and retained in accordance with Federal/State laws and regulations. Minimum retention schedules are listed in the Policy and Procedures. Proposed changes, additions, or revisions to the record retention schedule, along with supporting documentation, will be submitted to the Professional Standards Committee for initial review and approval. When appropriate, legal opinion will be consulted. Approved changes will be incorporated into Altus Healthcare Management Services Policy and Procedures and distributed as appropriate.
6. **Active/Inactive Records:** Records are to be reviewed periodically to determine if they are active or inactive. Records that are no longer required as active will be reviewed and assessed for storage in designated off-site storage facility. Duplicate, multiple and non-record materials are not to be sent to the designated off-site storage facility, but should be destroyed. Whenever possible, the official record is the one that will be retained according to established retention schedules.

Section II Records Destruction

1. Records that have satisfied their legal, fiscal, administrative and archival requirements may be destroyed in accordance with Policy and Procedures.
2. Records cannot be destroyed if involved in a matter of litigation/investigation. These records must be maintained securely until the litigation/investigation is resolved/finalized. Once resolved/finalized, the records may be destroyed in accordance with the Policy and Procedures.
3. Altus Healthcare Management Services records must be destroyed in a manner that preserves the confidentiality of the information and renders the information no longer recognizable as Altus Healthcare Management Services records. The approved methods to destroy the records include, but are not limited to recycling, shredding, burning, pulping, pulverizing, and magnetizing.

Section III Divestiture or Closure of Facility

1. **Divestiture of a Facility:** In the event a is sold, the Claims/Insurance/Legal Services of the facility must ensure that sales documents will protect Altus Healthcare Management Services right to access Altus Healthcare Management Services business and medical records and will stipulate the non-destruction of Altus Healthcare Management Services records as appropriate. Additionally, before divestiture, facility electronic records must be backed up by the IT Department and forwarded to the Claims/Insurance/Legal Services. Also, unless the sales documents specify otherwise, software documentation must be transferred to the Claims/Insurance/Legal Services. Patient medical records should remain with the facility to ensure continuity of patient care. Consistent with the overall retention policy, no records will be disposed of until the period of retention has expired for such records.
2. **Closure of a Facility:** In the event a facility is closed, Altus Healthcare Management Services all facility business records, all facility electronic records and patient medical records must be maintained until the period of retention has expired for such records.

Section IV Exceptions Reporting Mechanism

In the event that an employee believes another employee, contractor or agent of Altus Healthcare Management Services is impermissibly destroying records or otherwise violating this policy, they should contact their Supervisor/Administrator.