	Retaining Electronic Health Records		
	Chapter:	Board Services and Program Administration	Policy # 2-2-3
	Section:	Assessment, Service Planning and Documentation	Revision # 1

- I. **PURPOSE:** To establish electronic health records retention and archival policy and procedures for health records accumulated in the care and treatment of mental health services.
- II. **APPLICATION:** All mental health services and programs operated by the West Michigan Community Mental Health Governing Body.
- III. **REQUIRED BY:** Standards for Michigan Community Mental Health Services, Section 7.1 (f)., accrediting bodies, State of Michigan, Medicaid Provider Manual and Health Insurance Portability and Accountability Act of 1996.

IV. **DEFINITIONS:**


Archived Health Documents: Consumer health documents or records maintained in a long-term storage management system that contain copies of files for back-up and future reference.

Electronic Health Record (EHR) This contains all of the clinical data for each person served, in addition to other data maintained by the agency, and is where all notes are written, outside data scanned, and should be consulted for the record of treatment by WMCMH.

- V. **POLICY:** It is the policy of West Michigan Community Mental Health that all information in the electronic health record is retained in compliance with State of Michigan requirements per the Department of History, Arts and Libraries, Records Management Services. This information is retained in paper, microfiche, or digital format.

VI. **PROCEDURES:**

1. All WMCMH documents are either created through the EHR or are scanned and indexed into the Electronic Health Records. **This includes documentation received from outside entities.**
2. All WM generated documents in the WMCMH Electronic Health Record are retained in compliance with State of Michigan requirements per the Department of History, Arts, and Libraries and Records Management Services.
3. All electronically stored health information is backed up per WMCMH Policy 3.8.2 Network Backup
4. Storage and Disposal of Scanned Documents:
 - 4.1 Documents are scanned, placed in a storage box, labeled with content and destruction date, and stored on site for 6 months. Each month,

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scanned documents reaching the six months destroy date are pulled and sent externally for destruction.

- 4.2 Archived health documentation prior to 2006 is available through a long-term storage management system. Images of key documents (Assessments, Psychiatric Reviews, Medication Reviews, Medication Records, Psychological Evaluations, and Transition Discharge Summary's) are available in the ECR. If additional information is required or a previously closed consumer re-enters services, images of the key documents will be made available in the ECR. Additional images of documents can be made available per request.

VII. **SUPPORTING DOCUMENTS:** Not applicable.

VIII. **POLICY/PROCEDURE REVIEW:**

REV#	APPROVED BY	Policy/Procedure	DATE
			08/2007
			01/2015
			03/2016
			04/2017
			04/2019
1	UM/UR	Annual Review	07/2021
1	UM/UR	Annual Review	10/2022
1	UM/UR	Annual Review	9/2023
1	UM/UR	Annual Review	8/2024
Board Approval Date: 02/20/1996			

IX. **CHIEF EXECUTIVE OFFICER ENDORSEMENT:**

I have reviewed and approved of policy # 2-2-3 Revision # 1.

CEO: Lisa A. Williams

Approval Signature: _____