

SANILAC COUNTY COMMUNITY MENTAL HEALTH AUTHORITY

ADMINISTRATIVE POLICY

NUMBER: BA009

NAME: MICROFILMING AND SCANNING POLICY

INITIAL APPROVAL DATE:	03/28/1995	BY: Sanilac CMH Board
(LAST) REVISION DATE:	11/29/2023	BY: CIO
(LAST) REVIEW DATE:	12/14/2023	BY: Policy Committee
DISCONTINUED DATE:	N/A	REPLACED BY: N/A

I. **PURPOSE**

Sanilac County Community Mental Health Authority (Sanilac CMH) has adopted this policy on scanning to comply with HIPAA as well as to protect the confidentiality and integrity of Protected Health Information (PHI) as required by law, professional ethics, and accreditation requirements. All personnel of Sanilac CMH and all contract personnel that view any scanned or microfilmed records must be familiar with the contents of this policy and follow its guidance.

II. **APPLICATION**

Populations: **ALL**
Programs: **Direct - ALL**
Contracted – ALL

III. **POLICY**

The computing and communication resources of Sanilac CMH are intended for Sanilac CMH business purposes and for professional growth through the sharing of information and ideas. It is expected that use of these computing and communication resources will fall within the guidelines of generally accepted social and business standards and demonstrate respect for all individuals. The scanned or microfilmed images are to assist Sanilac CMH in conducting day-to-day business.

IV. **DEFINITIONS**

- A. Electronic Health Record: Also known as EHR, shall refer to the protected health information of individuals served by Sanilac CMH and maintained in electronic format stored in computer files, in the EHR software system and on the servers of the Agency. This would be any protected health information generated on and after the period of October 1, 2007.
- B. Individual: Individual shall mean any individual who is receiving or has received services from Sanilac CMH.
- C. Paper Record: As of 01/30/2020 the only paper records maintained are copyrighted testing/assessment materials as well as OBRA charts. All other paper records have been scanned to an electronic format with a list maintained by the Medical Records staff.

V. **STANDARDS**

A. **MEDICAL RECORDS**

Effective October 1, 2012, Sanilac CMH began the conversion of all paper medical records to an electronic health record (EHR) in the Agency computer system known as OASIS. At this time all documents from the paper medical record have been scanned into OASIS. The only paper record not scanned would consist of copyrighted assessments that are unable to be scanned in the record due to

copyright rules; however, the findings will be documented in the EHR for the specific individual. Paper records will be stored in the Records Room of the Administrative Building.

B. BOARD CDMs and MEETING PACKETS

Past board packets and CDMs are scanned to a PDF file that is stored on the servers of the Agency for historical purposes and to comply with the Records Retention Guidelines of the Department of Community Health. A list shall be maintained by the Executive Administrative Assistant or designee of the information retained, i.e. months, CDMs, etc.

C. EMPLOYEE RECORDS

The Human Resources Manager shall determine the need to scan former employee records. These records shall be scanned to a PDF file that will be stored and maintained on the servers of the Agency and/or current Agency HR software pursuant to the Records Retention Guidelines of the Department of Community Health. A list shall be maintained of the personnel records scanned.

VI. PAST MICROFILMED RECORDS

Past microfilmed jackets will be kept in a special microfilm cabinet in the Records Room of the Administrative Building. No further microfilming of records will be done.

The past microfilm jackets have the following color codes that correspond to the case numbers:

- 400's – Yellow
- 800's – Black
- 300's – Red
- 200's – Blue
- 100's – Green

VII. PAST SCANNED RECORDS

Medical Records, Board packets and CDMs and former personnel records that were scanned were received on a CD from the scanning company. The CDs containing the scanned images were delivered to the IT Department for input into the appropriate directory on the server. A backup of the server was put on a hard drive and is kept in a locked fireproof safe in the Ehardt server room. Rights to access the appropriate directory on the server were determined and granted by the IT Department.

VIII. RETENTION OF ELECTRONIC RECORDS

The electronic record will be retained and available for re-creation. Previously electronic scanned records are on optical media and a copy of placed on the server. A backup of the server was put on a hard drive and is kept in a server room and locked in a fireproof safe.

IX. ATTACHMENTS

None

X. REFERENCES

General Schedule #20 – Community Mental Health Services Programs - Retention and Disposal Schedule, Department of Community Health, dated May 1, 2007.
Policy BA004 – Medical Record Policy