

SAN MATEO COUNTY
MENTAL HEALTH SERVICES DIVISION

DATE: January 10, 2007

MENTAL HEALTH POLICY NO.: MH 07-01

SUBJECT: Record Room/Chart Security

AUTHORITY: Local; MH Policy 00-04 Chart (Medical Record) Management

SUPERSEDES: Prior Established Practice

PURPOSE

To establish a procedure that assures the security and confidentiality of medical charts and other written materials containing protected health information (PHI) that are stored in record rooms at Mental Health Clinics.

POLICY

A. Record Rooms

- Record Rooms are unlocked at 8 a.m. and locked again at 5 p.m. unless designated administrative staff are supporting after-hours clinical services. In that case, the record room shall be locked by the administrative support staff when their assignment is over.
- The record room key is kept in a secure location known only by the Patient Services Supervisor, Lead Support staff, and Record Room Clerk.
- Closed charts and multiple volumes of charts may be kept in a separate record room, which always remains locked. That key is also kept in a secure location known to the above staff.
- All charts and other items containing client information (i.e., loose progress notes, working charts) are placed in the record room each evening.
- Charts are filed on shelves in numerical order.

B. Sign-out Process

- When a staff member (administrative or clinical) removes a chart from the record room, the following (or similar) procedure must be followed:
 - Sign name on index card located in the chart.
 - Place card in plastic “holder” and insert it on the shelf in the place where the chart should be located.
 - When the chart is returned to the record room, the index card is removed from the “holder” and reinserted in the front of the chart.
- It is understood that unique site-based procedures may vary from the above prototype in the nature of the placeholders in use. Nonetheless, there will always be a clear written trail to identify who has removed a chart from the Record Room.

C. Sending Charts/Information Off-Site

- When the chart is sent to another unit, client mental health number, name, date and the unit to which the chart is being sent is entered into the log book.
- When a chart is received from another unit, the client mental health number, name, date and the unit from which the chart is sent is entered into the log book.

D. Chart Security Pilot Project

- The purpose of the pilot project is to test out procedures that will assure the greatest security for written PHI that must be taken into the field (i.e., materials needing client signature, medication prescribing notes, etc.).
- When the clinician finds it necessary to remove PHI from the chart/site and take this into the field, the client mental health number, name, date, time and the records removed will be entered into a specially designated log.
- When the written materials are returned to the site, the date and time the material is returned will be documented in the log.
- A special location will be established in the administrative office for priority filing of returned materials; the clinician may also file the materials directly in the chart.

Approved: _____
Gale Bataille, Director
Mental Health Services Division

Reviewed: _____
