

## BHS Policies and Procedures



City and County of San Francisco  
Department of Public Health  
San Francisco Health Network  
BEHAVIORAL HEALTH SERVICES

1380 Howard Street, 5th Floor  
San Francisco, CA 94103  
415-255-3400  
FAX 415-255-3567

### POLICY/PROCEDURE REGARDING: **Security and Retention of Behavioral Health Services Medical Records**

Issued By: Kavoos Ghane Bassiri, LMFT, LPCC *Kali*  
Director of Behavioral Health Services

Effective Date: July 17, 2018

Manual Number: 3.10-07

References: Consent Manual 2018  
45<sup>th</sup> Edition by California Hospital  
Association

**Substantive Revision. Replaces Policy 3.10-07 dated February 29, 2016.**

#### **Purpose:**

The purpose of this policy is to provide guidelines for the security and retention of Behavioral Health Services (BHS) medical records.

#### **Scope:**

This policy applies to all organizational providers within Behavioral Health Services. It does not apply to individual private practitioners.

#### **Policy:**

- **Mental Health and Substance Use Services Medical Records**

Civil Service Organizational Providers' medical records are the property of the Department of Public Health, Behavioral Health Services. Medical records of organizational providers are the property of their own legal entities.

- **Security**

All medical record storage must comply with the three-lock rule. The three-lock rule refers to the door of the building, the door of a room, and the locked file cabinet. All medical records are kept in a secure room, in a locked file cabinet, or in a locked drawer when not in use.

1. **Sign-Out of Medical Records**

It is recommended that access to the provider's medical record storage room be restricted to a maximum of 2 to 3 designated individuals.

When provider staff checks out a medical record at the provider's site, an out-guide or any means must be used. An out-guide lists the name of the person who checks out the medical records, client's name, BIS#, and the date.

Medical records taken out of the provider's site to facilitate a home-visit shall be the responsibility of the clinician. All medical records shall be returned to medical records storage by the end of the day. However, it is recommended, if at all possible, that the medical record be copied and the original medical record be kept at the site. This process would eliminate the need for creating new medical record in case of theft or loss.

- **Retention**

1. Medical records of organizational providers shall be maintained safely for a minimum of 10 years following the client's last contact date (billable or non-billable service).

2. **Minors**

Medical records of unemancipated minors shall be kept for at least one year after such minor has attained the age of 18 years, but in no event less than 10 years following the client's last contact date (billable or non-billable service).

3. **Inpatient**

Inpatient medical records (including PES and IMDs) must be retained for the period established by the individual institution policy.

- **Disposition/Destruction of Medical Records**

1. Civil Service organizational providers may send their closed medical records to Health Information Management (HIM), Behavioral Health Services, at 1380 Howard Street 4th Floor in Room 427, where they are stored, purged, and destroyed. HIM is also responsible for documenting the client's name, date of birth, BIS#, and destruction date for each medical record kept at this location.

2. Contract organizational providers are responsible for storing, purging, and destroying their own medical records in compliance with Behavioral Health Services/Health Information Management retention requirements. The same responsibility applies to each contract organizational provider when documenting client's information for each medical record stored at their site.

- **Off-Site Medical Record Storage**

1. All providers that do not have the capacity to store inactive medical records before the required retention period can send the inactive medical records to a HIPAA-compliant Off-site storage company.

2. In order to facilitate retrieval of medical records from the storage company, the provider staff may follow these procedural steps before sending medical records to storage.
  - a. Sort records by last year of service. For minors, sort records by the year when the minor reaches the age of 19 and not less than 10 years from the last year of service.
  - b. Box records by the last year of service in alphabetical order using client's last name. For example, Box 1-1995(aa-ac), Box 2-1995(ad-az), Box 3-1996(aa-ac), etc.
  - c. Make a list of medical records with client's full name, date of birth, BIS#, and destruction date for each medical record.
  - d. Keep the list at the provider's site for future medical records retrieval.

**Contact Persons:**

Compliance Officer, Office of Compliance & Privacy Affairs, 415-255-3706  
Health Information Management, 415-255-3487

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