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Effective	9/1/2022		
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Next Review	12/31/2024		

## #007- Client Chart Format and Record Retention

### I. POLICY

It is the policy of Children's Community Mental Health Services and Wraparound Milwaukee (hereby referenced as Wraparound Milwaukee) that all affiliated Agencies providing care coordination services maintain an organized, comprehensive chart on each client that is enrolled in Wraparound Milwaukee and/or who has been a Wraparound Milwaukee client. This chart, along with individual client information maintained in the Wraparound Milwaukee Synthesis Management Information System, is known for purposes of the HIPAA Privacy Regulations as the Designated Record Set. Charts (active and disenrolled) must be maintained in a locked room or file cabinet. It is preferable that the room/cabinet be fireproof.

**NOTE: All information/documents entered/uploaded and/or originating in Synthesis do not need to be printed and kept in a hard copy file.**

*NOTE: This policy utilizes the term "Care Coordinator", which applies to Wraparound, REACH, CCS, and Youth Connect Care Coordinators and FISS Case Managers. It also uses the terms "Child and Family Team" - which applies to any group of people that may be working with a family or young adult. The term "Youth" is used in this policy and applies to the enrollee in the program, whether a child, adolescent, or young adult.*

### II. PROCEDURE

#### A. CURRENTLY ENROLLED CLIENT CHARTS

Each Agency must maintain a chart on each of their assigned clients and are expected to keep their charts up-to-date at all times. The chart must be broken down into the following sections and labeled as follows:

Section 1 - INTAKE / CONSENTS

Section 2 - ASSESSMENTS / EVALUATIONS

Section 3 - FISCAL

Section 4 - CARE PLANS

Section 5 - LEGAL

Section 6 - CORRESPONDENCE

Section 7 - NOTES

The Agency may include more sections within their chart, but **no less** than those indicated above.

The sequencing of the sections in the chart can be determined by the Agency.

**Section 1 - INTAKE / CONSENTS**

Maintained in Synthesis:

- Authorization to Release/Exchange Information Form
- Consent/Acknowledgement Form
- Medicaid Enrollment Request Form
- Enrollment Confirmation Letter
- Intake Form (Screener's Intake)
- Children's Mobile Crisis Consent for Treatment Form
- Disclosure Tracking Log for Protected Health Information (as applicable)
- CLTS/MH/AODA Functional Screen Consent (CCS only)
- Admission Agreement (CCS only)
- Milwaukee County Behavioral Health Division Consent for Treatment, Release of Information, Assignment of Benefits, Notice of Disclosure Form (CCS only)
- Determination of Need (CCS only)
- Prescription (CCS only)

**Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Records from past hospitalizations (mental health and/or medical)/treatment/therapy
- Any other medical information related to client/family medical history/concerns, documentation of past/recent physicals or health checks that were done, information regarding allergies, etc.
- Agency specific Consent for Service forms or Consent for Treatment Forms.
- Agency specific Service Agreements/Contracts
- Agency specific Client/Family Rights Documents
- Initial Assessment/Intake records of current/past inpatient hospitalization or residential placement
- Discharge Summaries from past residential and/or inpatient hospitalizations (as applicable)

## **Section 2 - ASSESSMENTS**

### **Maintained in Synthesis:**

- Child Behavior Checklist (Wrap/REACH only)
- Youth Self Report (Wrap/REACH only).
- Child and Adolescent Needs and Strengths (CANS) Evaluations
- PPS (CCS only)
- CLTS/MH/AODA Functional Screen (CCS only)
- Warwick Edinburgh Mental Well-Being Scale (CORE only)

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Strengths/Needs Assessment(s) that are **not** Synthesis generated
- Psychological Evaluations
- Team/School Reports

## **Section 3 - FISCAL**

### **Maintained in Synthesis:**

- Service Authorization Requests [SAR's].

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Copies of I-LIFE Provider Applications and Tax Forms
- Receipts for discretionary and other Wraparound Milwaukee funded items
- Copies of Medicaid Card (Forward Card) and/or Other Insurance Coverage
- Supplemental Security Income (Social Security Income) (SSI) Documentation

## **Section 4 - CARE PLANS**

### **Maintained in Synthesis:**

- Plan of Care (POC)
- POC Attendance Signature Sheet or Attendance Roster
- POC Domain Review Checklist
- Out-of-Home Care Authorization Requests
- Day Treatment Prior Authorization Form

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Residential Treatment Care Plans (*not monthly Progress Reports*)
- Individualized Education Plans (IEP's)

- Youth Connect - Care Plan

## **Section 5 - LEGAL**

### **Maintained in Synthesis:**

- Court Orders/Docket Sheets
- Court Extension/Revision Reports
- Court Letter – Progress Report
- Juvenile Justice Risk Assessment/Progress Report
- TPR / Adoption Reports/Requests
- Notice of Change of Placement Form
- Runaway/Temporary Placement Status Report
- Temporary Physical Custody Orders
- Critical Incident Reports/Network Agency Incident Reports
- Temporary / Permanent Guardianship Orders

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Request for Emergency Foster Home Study
- Foster Home License/Documentation
- Capias/Apprehension Requests/Warrants
- Permanency Plans (DMCPS submitted Permanency Plans should be filed in hard copy. Permanency Plans for youth on Delinquency Orders are entered in Synthesis)
- Legal Custody Orders
- Birth Certificates

## **Section 6 - CORRESPONDENCE**

### **Maintained in Synthesis:**

- Disenrollment Documentation Forms
- Family Satisfaction Surveys
- Care Coordinator Change Letters
- Referral Form for Provider of Services
- Grievance and Appeals
- CCS Discharge Summary (CCS only)

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Central Staffing Papers
- Provider Service Logs (i.e., mentor, parent assistant, tutor logs, etc.)

- Copies of any Audits/Reviews

## **Section 7 - NOTES**

### **Maintained in Synthesis:**

- Care Coordinator Progress Notes (Wrap/REACH) or Provider Notes (CCS, Youth Connect)
- Consultant Plan of Care Review Notes

### **Other forms (if not uploaded into Synthesis) that should be filed under this section:**

- Care Coordination Agency Staffing Notes
- Provider Network Service Provider Notes

## **B. DISENROLLED CLIENT CHARTS**

All Wraparound Milwaukee client charts must be retained until the client becomes 19 years of age or until 7 years after treatment has been completed, whichever is longer. These charts must be retained at the Agency until such time that an Agency no longer provides care coordination services for Wraparound Milwaukee and/or the Agency arranges for the chart to be maintained by Milwaukee County. If a Care Coordination Agency no longer provides Care Coordination services for Wraparound Milwaukee, then the charts must be brought to Wraparound Milwaukee upon the Agency's departure from the Provider Network.

## **C. PROPER DISPOSAL OF CLIENT RECORDS (PHI-Protected Health Information)**

As defined in the HIPAA privacy and security regulations, PHI is protected health information (*including demographic information*) that:

- Is created, received, maintained or transmitted in any form or media.
- Relates to the past, present or future physical or mental health or condition of an individual, the provision of health care to an individual, or the payment for the provision of health care to an individual.
- Identifies the individual, or provides a reasonable basis to believe that it can be used to identify an individual.

Under the HIPAA privacy and security regulations, health care and related records containing PHI must be disposed of in such a manner that they cannot be reconstructed. This includes ensuring that the PHI is secured (*i.e., rendered unusable, unreadable or indecipherable*) prior to disposal of the records.

To secure PHI, providers and their business associates are required to use one of the following destruction methods approved by the DHHS:

- Paper, film, labels or other hard copy media should be shredded or destroyed such that the PHI cannot be read or otherwise reconstructed.
- Electronic media should be cleared, purged or destroyed such that the PHI cannot be retrieved according to National Institute of Standards and Technology Special Publication 800-88 Guidelines for Media Sanitization.

Health care and related records containing personally identifiable data must be disposed of in such a manner that no unauthorized person can access the personal information. For the period of time between a record's disposal and its destruction, providers and their business partners are required to take actions that they reasonably believe will ensure that no unauthorized person will have access to the personally identifiable data contained in the record.

Any covered entity provider or provider's business associate who violates federal HIPAA regulations regarding the confidentiality and proper disposal of health care and related records may be subject to criminal and/or civil penalties.

### **III. DESIGNATED RECORD SET / ENTIRE CLIENT RECORD**

Wraparound Milwaukee defines the Designated Record Set to be those items identified in Sections 1 through 7 of the "Client Chart Format" Policy or the "Entire Client Record" and all individual client information including enrollment, clinical and payment related information that is maintained in Synthesis.

**Note: Client Charts (current or disenrolled) must be accessible at any time for Wraparound Milwaukee, Department of Health & Human Services, State of Wisconsin, or Federal auditing/reviews.**

### **IV. WRAPAROUND MILWAUKEE RECORD RETENTION (Medicaid)**

- A. Wraparound Milwaukee must/will provide duly authorized representatives of the State of Wisconsin (including the Office of the Inspector General and/or their designees), the Centers for Medicare and Medicaid Services (CMS), the United States Department of Health and Human Services (HHS) Inspector General, or the Comptroller General (or their designees), access to all records and materials relating to the provision of and reimbursement for services/activities payable under such Contract. Access shall include the right to inspect, audit and reproduce all such records.
- B. Access of any/all Contract-related records will be provided throughout the duration of the Contract.
- C. Access will be provided for a period of ten (10) years after termination of the Contract or from the date of completion of any audit, whichever is later.

#### **Approval Signatures**

Step Description	Approver	Date
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Michael Lappen: BHD Administrator	8/29/2022
Brian McBride: ExDir2 – Program Administrator	8/29/2022
Dana James: Integrated Services Manager- Quality Assurance	8/25/2022
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