

SUBJECT: ACCESSIBILITY OF CLINICAL RECORDS

EFFECTIVE  
DATE: 01-11-10 (replaces 09-16-09)

APPROVED BY:

Reviewed (no changes): \_\_\_\_\_  
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Executive Director

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POLICY

It is the policy of McIntosh Trail CSB to assure that access to clinical records is limited, whether written or computerized. Each area program will develop and implement a systematic procedure to monitor records being checked out of the clinical records storage area.

PROCEDURE

Each staff member having access to consumer records will sign the "Access to Clinical Records" form when they begin employment. The Medical Records Clerk will verify the signature and forward a copy of the form to the IT Coordinator. When a staff member terminates employment from a program the "Access to Clinical Records" form is updated and sent to the IT Coordinator, at which time, access to computerized information will be terminated. If a staff member transfers to another program, he/she will sign a new "Access to Clinical Records" form for that program which will then be verified by the Medical Records Clerk and forwarded to the IT Coordinator. The Access to Clinical Records form can be found in FormDocs.

Each Medical Records Clerk will maintain a list of staff who are authorized to access clinical records. This list is to be kept current, dated and signed by the Medical Records Clerk and forwarded to the IT Coordinator on an annual basis. Clinical records are to be treated in a manner that will protect consumer information at all times, as outlined in the Confidentiality Policy.

There will be some circumstances when accessibility to consumer records will need to be more restricted. When a staff member has a personal relationship with a former or current consumer to the degree that access to the clinical record would be detrimental to the consumer, the active/closed record will be sequestered in a locked file in the center director's office or their supervisor's office, if appropriate. Clinical records will also be sequestered in the center director's office whenever there is a potential risk management issue such as legal action against the agency. This needs to be reviewed in every suicide attempt, homicide, and in processing complaints breaching consumer rights.

Reference: JCO IM