

## POLICIES AND PROCEDURE MANUAL

<b>Chapter:</b>	<b>Information Technology</b>		
<b>Title:</b>	<b>Record Retention Policy</b>		
<b>Policy:</b> <input checked="" type="checkbox"/> <b>Procedure:</b> <input type="checkbox"/>  <b>Page:</b> 1 of 2	<b>Review Cycle:</b> Biennial  <b>Author:</b> Chief Information Officer	<b>Adopted Date:</b> 09.02.2014  <b>Review Date:</b> 09.12.2023	<b>Related Policies:</b> HIPAA Information Management Disaster Recovery

### **Purpose**

To ensure Mid-State Health Network (MSHN) maintains Record Retention practices that meet legal and regulatory standards under the Medicaid Specialty Supports and Services contract, the State of Michigan Records Retention and Disposal Schedule, and federal and state financial guidelines, including Health Insurance Portability & Accountability Act (HIPAA).

### **Policy**

MSHN shall have effective record retention policies and procedures that comply with requirements established by the Michigan Department of Health and Human Services (MDHHS) contract for Medicaid Specialty Supports and Services and the State of Michigan Records Retention and Disposal Schedule, and federal and state statutes, including HIPAA. This policy is also intended to eliminate accidental or innocent destruction of records, as well as promote efficiency and reduce unnecessary storage of documents.

MSHN record retention policies and procedures must have mechanisms for securely storing, retaining and destroying data as required and recommended.

- MSHN shall periodically review their administrative files.
- Records shall be retained and disposed according to State of Michigan Records Retention and Disposal Schedule and federal and state legal and regulatory standards.
- All records disposals will be done in a manner ensuring confidentiality of protected data.

MSHN shall ensure compliance by reviewing and monitoring record retention policies and procedures as well as conducting site visits as necessary.

### **Applies to**

- All Mid-State Health Network Staff
- Selected MSHN Staff, as follows:
- MSHN's Affiliates:  Policy Only     Policy and Procedure
- Other: Sub-contract Providers

### **Definitions**

- MSHN:** Mid-State Health Network
- CMHSP:** Community Mental Health Services Program
- IS:** Information Services or Information Systems
- IT:** Information Technology
- MDHHS:** Michigan Department of Health and Human Services
- PIHP:** Prepaid Inpatient Health Plan
- BBA:** The Balanced Budget Act of 1997
- HIPAA:** Health Insurance Portability & Accountability Act

**Other Related Materials**

Data Validation Procedure  
Information Management Procedure  
MSHN Compliance Plan

**References/Legal Authority**

Medicaid Managed Care provisions of the Balanced Budget Act (BBA) of 1997  
Health Insurance Portability and Accountability Act (HIPAA) of 1996  
MDHHS Medicaid Specialty Supports and Services  
Contract  
MDHHS Medicaid Provider Manual  
Michigan DTMB Community Mental Health Record Retention Schedule  
[https://www.michigan.gov/dtmb/0,5552,7-358-82548\\_21738\\_31548-56101--,00.html](https://www.michigan.gov/dtmb/0,5552,7-358-82548_21738_31548-56101--,00.html) (refer to GS20)

**Change Log:**

<b>Date of Change</b>	<b>Description of Change</b>	<b>Responsible Party</b>
03.13.2014	New Policy	K. Tilley
05.18.2016	Annual Review	F. Goodrich
06.21.2017	Annual Review	Chief Information Officer
06.2018	Annual Review	Chief Information Officer
06.2019	Annual Review	Chief Information Officer
06.2021	Biennial Review	Chief Information Officer
05.18.2023	Biennial update	Chief Information Officer