

Individual Records

A. General Policies

- a. Program documentation shall be kept for each Individual per regulatory standards. Records may be kept electronically or in handwritten format.
- b. A separate record shall be maintained for each Individual.
- c. All records shall be managed and stored in a manner consistent with regulatory guidelines.
- d. Current records for the Individuals shall be kept within the respective program(s) of service delivery. All other Individual records shall be kept on the corporate office grounds. All Individual records shall be secured in a locked location at all times not in use by authorized members of the Team.

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B. Maintenance of Individual Records

- a. The program is required by regulation to maintain a comprehensive record for each Individual that contains following elements, at a minimum:
 - i. Proof of program planning and the continuous assessment of the Individual
 - ii. Documentary evidence of the Individual's progress in and response to service delivery
 - iii. Protection of the legal rights of the Individual, program, and Team Member
- b. Any Team Member who makes a hand written entry into an Individual's record must:
 - i. Write legibly in ink
 - ii. Date the entry
 - iii. Sign the entry
 - iv. Avoid use of any form of White Out
- c. Electronic entries shall be dated and signed automatically.
- d. All documentation shall have a named source.
- e. Electronic records shall be able to be converted into legible paper copies for assessment by an auditing entity, as requested.
- f. If the electronic record constitutes a duplicate or substitute copy of the original paper record, including all original entries and approved alterations, documentation shall identify the original creator, including dates of original and all subsequent entries.
- g. A back-up system shall be implemented for electronic record keepings.
- h. Team Members shall avoid using symbols and abbreviations when making entries into an Individual's record except for those included in the list of abbreviations made available by the organization.
- i. As all Individual records are legal documents, demonstrating compliance in service delivery and offering protection against accusations regarding malpractice or violations of rights, all documentation shall be retained and disseminated in accordance with all applicable regulatory guidelines.

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C. Record Retention

- a. Individuals served by Friendship Community:
 - i. Friendship Community shall preserve records relating to Individuals served until the expiration of five years after the funded service is provided.
 - ii. Records that relate to litigation, audit exceptions, or the settlement of claims related to performance or expenditures shall be retained until such litigation, exceptions or claims have reached final disposition.
- b. Human Resources Records:
 - i. Human Resources records pertaining to Personnel Files will be kept in an electronic form for a minimum of seven years after the Team Member's termination date. The previous hard copy files will be purged three years after the Team Member's termination date and a skeleton file, including pertinent job performance documents, will be retained for a minimum of seven years.
- c. Financial Records:
 - i. Friendship Community shall preserve physical financial records for seven fiscal years. This include APs, ARs, audited financial statements, grants, invoices, payroll expenses, W2s, W3s, 1099s, 1096s, and 990s. An electronic copy of audited financial statements and 990s will be kept permanently.
- d. Corporate Documents:
 - i. All Corporate documents and revisions shall be maintained permanently.

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D. Access to Records

- a. The use or disclosure of information concerning Individuals in all programs is restricted to purposes directly related to the administration and implementation of the Individual's Individual Support Plan(ISP) or Individual Program Plan(IPP).
- b. Friendship Community and its subcontractors shall provide full and free access to any records pertaining to Individuals served in funded programs, services and payment for services to the following for evaluation, through inspection or other means, of the quality, appropriateness, and timeliness of services:
 - i. The Commonwealth
 - ii. The United States Comptroller General
 - iii. The United States Department of Human Services and their authorized representatives
 - iv. Centers for Medicare and Medicaid Services
- c. All records and Case Notes shall be available and accessible to:
 - i. Individual
 - ii. Friendship Community Team Members (as appropriate)
 - iii. The Supports Coordinator
 - iv. The Supports Coordination Organization
 - v. The Administrative Entity
 - vi. The Office of Developmental Programs
 - vii. The United States Department of Health and Human Services
 - viii. The Department of Health
- d. Such records and progress notes shall be available and accessible for the full retention period.

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E. Confidentiality of Records

- a. All information kept in an Individual's record shall be considered confidential.
- b. The record is the property of Friendship Community. Team Leaders are responsible to ensure that the information is not lost, damaged, tampered with, or accessed by unauthorized persons.
- c. The Individual or their legal guardian must give written consent for the release of information to persons not otherwise authorized to receive it.
- d. The Individual shall have access to his/her records.
- e. Records must be locked when unattended.
- f. Friendship Community shall restrict Team Member access to Individual records on a 'need-to-know' basis.
- g. Only those Team Members concerned with the fiscal affairs of the Individual shall have access to the financial records.
- h. Individual files must remain on site unless authorized by a member of the Leadership Team to take files off site for appropriately specified reasons and durations.
- i. Electronic health portals hosted by an outside source shall only be accessed by Team Leaders and/or a member of the Nursing Team or appropriate designees. Friendship Community reserves the right to decline use of such portals based on security risks associated with password management. A designated family member may maintain an Individual's health portal and shall be responsible for security of the password. An Individual's family member may be requested to provide medical documentation provided via the Individual's health portal to be retained in the Individual's record as needed.
- j. Friendship Community shall comply with the Health Insurance Portability and Accountability Act (HIPAA) and other privacy regulations.

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F. Transfer of Confidential Information

a. Transfer of written information

- i. A signed Authorization for Release of Information is required in order to release written information to persons or agencies outside of Friendship Community. This includes families and advocates of Individuals of 18 years and older. An Individual's legal guardian shall provide written consent to release information on behalf of the Individual.
- ii. Copies of records shall be mailed, faxed, e-mailed, or hand delivered to the authorized person in accordance with privacy regulations so as to prevent access by non-authorized users.
- iii. No records which are received from other organizations shall be given to another party unless a specific Authorization for Release of Information is obtained.

b. Transfer of oral information

A signed Authorization for Release of Information shall be obtained before verbally exchanging confidential information to persons or organizations outside Friendship Community.

c. Authorization for Release of Information

- i. Each Release of Information shall be specific
- ii. Each Release of Information shall identify the purpose for the exchange of information.
- iii. Each Release of Information shall be time/event limited. Automatic expiration shall occur in one year after signature unless indicated otherwise.

d. Procedure for transfer of records when Individual moves within Friendship Community programs that have the same license (e.g., Waiver Residential to Waiver Residential, ICF/ID to ICF/ ID, etc.):

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- i. The Program Manager/Program Coordinator shall inform the receiving Team Members about the Individual and his/her needs
 - ii. Pertinent records of the Individual shall be transferred with the Individual
 - iii. Any additional records shall be kept at the corporate office
- e. Procedure for transfer of records when Individual moves within Friendship Community programs that have a different license (e.g., Waiver Residential to ICF/ ID, ICF/ ID to Waiver Residential, Home Based Services to Residential, etc.):
 - i. The original record is kept in the facility from which the Individual is being discharged. Relevant information is copied and provided to the program where they are being admitted.

G. Fraudulent Activity Suspicion

- a. In the event of suspected or confirmed fraudulent credit activity, the Program Coordinator, Associate Director and the Risk Management Officer shall be notified.
- b. Fraudulent Credit Activity Policy will be implemented by the Program Manager, under the direction of the Program Coordinator. The Risk Management Officer shall provide support and additional guidance as needed.