

ChrisMannDivine (CMD) Record-keeping Policy & Procedure

Effective Date: 2/26/2025

Reviewed & Approved By: Christina Akoi

Purpose

To establish clear guidelines for maintaining confidential, secure, and compliant record keeping practices in accordance with **55 Pa. Code Chapter 6100, Section 6100.54**. This policy ensures that all records related to individuals receiving in-home and community support services are securely maintained, accessible only to authorized personnel, and retained for the required duration.

Scope

This policy applies to all CMD employees, contractors, and administrative personnel responsible for handling individual records, financial documents, and program-related materials.

Record-keeping Standards

CMD adheres to the following requirements:

1. Confidentiality & Secure Storage

- All individual records are kept **confidential** and stored in a **secure location** with restricted access.
- Electronic records are maintained in **WellSky**, a secure **Electronic Medical Records (EMR) system** with controlled access.
- Physical records are stored in **locked filing cabinets** in a restricted office area.

2. Access to Records

- Individual records **cannot** be shared or accessed by anyone other than:
 - The **Department of Human Services (DHS)**
 - The **designated managing entity**

- The **individual's support coordinator, targeted support manager, or base-funding support coordinator**
- Any other entity **only with written consent** from the individual or their legally designated representative.

3. Record Retention Requirements

- CMD maintains all required records for **at least 4 years** from the **Commonwealth's fiscal year-end** or **CMD's fiscal year-end**, whichever is later.
- If an audit or litigation occurs, records must be retained **until the issue is resolved**, regardless of the 4-year standard.
- If CMD **completely or partially terminates a program**, related records must be kept for **at least 5 years** from the termination date.
- Financial books and individual records comply with all applicable **Federal and State statutes and regulations**.

4. Documentation & Organization

- CMD ensures **accurate and up-to-date documentation** for all individual records, including:
 - Service delivery notes
 - Individual support plans (ISPs)
 - Incident reports
 - Medical records (if applicable)
 - Training and employment documentation for staff
- All records must be **dated, signed, and properly filed** to ensure compliance with **ODP and DHS requirements**.

5. Audit & Compliance Monitoring

- CMD performs **internal audits** every **six months** to verify proper record retention and security compliance.
- Any discrepancies or missing documentation must be **addressed immediately** with corrective action.

- Staff are required to undergo **annual training** on recordkeeping compliance and confidentiality protocols.

Non-Compliance & Corrective Action

- **Unauthorized access** to records will result in **disciplinary action**, including termination if necessary.
- **Failure to maintain accurate records** or comply with retention guidelines will be addressed through **corrective measures**, including staff retraining and policy enforcement.
- CMD will **report any breaches** of confidentiality to ODP and DHS as required by law.

Conclusion

CMD is committed to ensuring proper documentation, security, and retention of individual records in full compliance with **55 Pa. Code Chapter 6100**. By following this policy, CMD safeguards confidential information and maintains high standards of regulatory compliance.

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