



Records of the Person Served

POLICY:

It is the policy of Brightlife Enhancement Services object to develop and maintain a complete and accurate record to ensure that all appropriate individuals have access to relevant clinical and other information regarding each person served.

PROCEDURES:

- A. The individual record of each person is maintained in such a manner as to protect the confidentiality and integrity of the record. The guidelines for this process are as follows:
 - 1) Each record will be created using the client's Last and First Name, upon the first admission to any of Brightlife Enhancement Services services or programs.
 - 2) Individual records will be maintained at administrative of Brightlife Enhancement Services in Hagerstown, Maryland.
 - 3) All records will be maintained in a systematic fashion that follows a standard format for record organization established by Brightlife Enhancement Services
 - 4) Documentation in the individual record will be clear and legible. The use of white-out is prohibited.
 - 5) All information in the record will be current and complete, and documents that require signatures will contain original or electronic signatures.
 - 6) To maintain uniform individual records that protect the integrity of demographic, financial, and clinical information, the individual records will be assembled according to the following guidelines:
 - a. The individual record is defined as all information collected and used regarding an individual seeking services from Brightlife Enhancement Services
 - b. The individual record will contain three distinct types of information: demographic, financial, and clinical.



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- c. The assembly of the record is initiated upon admission to services and/or programs.
 - d. Upon discharge from Brightlife Enhancement Services the individual record is assembled into a final order according to the established standard closed record format.
 - e. A complete listing of closed records that have been disassembled according to procedures and removed to storage areas will be maintained in the records room.
- 7) Individual records will be retained for 10 years after the most recent discharge date.
- 8) All pre-admission screening forms of persons not admitted to Brightlife Enhancement Services will be retained for 7 years. If the form has no identifiable information regarding the person served, it will be destroyed in one (1) year. External referral forms for referrals to Brightlife Enhancement Services will be included in the record for persons admitted and will be retained for at least 10 years.
- B. All individual records will contain, at a minimum, the following information:
- 1) The date of admission/service start date.
 - 2) The name, address, and telephone number of the person's representative, conservator, guardian, or representative payee, if appointed.
 - 3) Emergency contact information including a name, address, and telephone number.
 - 4) The name of the person coordinating services.
 - 5) The location of any other records.
 - 6) The name, address, and telephone number of the person's primary care physician (if applicable)



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- 7) The person's health history, current medications, admission screening, documentation of orientation, assessments, and individual plan and reviews.
 - 8) A transition plan, when applicable
 - 9) A discharge summary that:
 - a. Includes the person's diagnosis or disability/disorder.
 - b. Identifies the presenting condition.
 - c. Describes the extent to which established goals and objectives were achieved.
 - d. Describes the services provided.
 - e. Describes the reasons for transition/discharge.
 - f. Identifies the status of the person served at discharge/transition.
 - g. Lists the recommendations for services or supports.
 - h. Includes the dates of admission.
 - i. Includes the date of transition from the program.
 - 10) Any correspondence pertaining to the person served.
 - 11) Authorization for release of information.
 - 12) Documentation of internal or external referrals.
- C. To ensure that records are maintained in a uniform manner, are secure, and are available to support continuity of care, the following guidelines will apply:
- 1) All records will be filed, secured, and retrieved by the records staff. Exceptions will include designated personnel at service locations where the record is on-site and maintained by the clinical staff. Those locations will follow site-specific procedures that limit access to the records and that require the records are maintained in a secure fashion.
 - 2) The Corporate Compliance Officer will be responsible for controlling the records and implementing policies and procedures pertaining to the records.



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- 3) Records maintained by the utilization/records staff will be kept in a secured area with access limited to only designated records staff. The records area will be secured by lock at any time records staff is unable to remain within the area. Only records staff and designated supervisory personnel will have access to keys to the area. A designated staff member will be available and known to all staff in order to access the records after hours and in case of an emergency.
- 4) All records maintained at the service location by clinical staff will be secured in a locked file cabinet. If the record is in a staff office, that office will be locked when not occupied.
- 5) If a secondary or “working record” is maintained at a satellite office, in addition to the primary record, it will be maintained according to the safeguards contained in this policy, and the record will be limited to the following information:
 - a. Screening, referral, and assessment information.
 - b. Program admission form.
 - c. Individual plan and subsequent reviews.
 - d. Emergency medical information to include:
 1. The name, address, and telephone number of the person’s physician.
 2. The name, address, and telephone number of the person to be notified in case of an emergency.
 3. Medical insurance identification.
 4. Medication used.
 5. Medication and food allergies.
 6. Significant medical problems.
 - e. The location of primary medical record.
 - f. All other requirements as outlined by regulatory and accreditation bodies.



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- 6) All records utilized by community-based providers will be maintained in a locked case, container, or brief case. Community-based providers will be informed during orientation of procedures for maintaining records outside of Brightlife Enhancement Services facilities.
- 7) All records will be kept in areas that provide reasonable protections from fire, water damage, and other hazards.
- 8) Records will be made available in a timely manner to authorized personnel by the records staff for scheduled appointments, for documentation purposes, and for reviews upon request.
- 9) The record will be tracked to individual staff members who will be responsible for safeguarding the record and doing their own filing before the end of the business day.
- 10) The filing of all loose materials in the record is a function of the records or other designated staff. The filing is to be kept current and will be placed in individual records within three working days. All loose filing will be kept in a container designated as “to be filed” within a secured records area/room or staff office if at a service location.
- 11) Any loose filing that cannot be identified will be turned over to the Corporate Compliance Officer. The material in question will be identified through exploration with service providers of content contained in the materials.
- 12) All data files maintained in electronic systems will be backed up on a daily basis and will be securely preserved at a separate location from the regular files.
- 13) All electronic record files maintained in any manner on Brightlife Enhancement Services electronic data system are subject to the policy and procedures regarding electronic records.
- 14) If records need to be transported to a different location, such as court proceedings, records will be placed in a sealed manila envelope or boxes marked “confidential” and placed in the locked trunk of a car for transportation to the destination. The Corporate



Compliance Officer is responsible for safeguarding the records while they are in transport. At no time will the records be left unattended.

D. Records will be audited on a quarterly basis by the records staff to ensure that Brightlife Enhancement Services maintains and processes record information in compliance with rules, regulations, and organizational policy and procedures. The following criteria will be used to evaluate the record management process:

- 1) A representative sample of records will be pulled from the active files on a monthly basis.
- 2) Records sampled will have intact record covers and labels that reflect allergies, payment method, and medication restrictions, when warranted.
- 3) Records in the sample will have all information filed according to the current record organization guidelines.
- 4) All documents and forms within the record will contain the appropriate dates, signatures, and authorizations.
- 5) The “loose/to be filed” documents will not contain dated material older than three working days.
- 6) The record tracking system will reflect the status and location of each sampled record.
- 7) All data in an individual’s database will be reflected in the documentation in the medical record.
- 8) The records staff or appropriate service provider will correct any problems discovered during the audit.
- 9) Patterns and trends will be tracked to identify any processes that may need corrective action and will be reported to the CEO.

E. Documentation in records will be consistent, directly related to services provided, and in compliance with legal, risk management, and clinical care standards. The following guidelines apply to documentation in the record:



- 1) Written documentation will be completed in black ink only.
 - 2) All written documentation will be clear, concise, accurate, and legible.
 - 3) All entries will be made in a timely fashion to increase accuracy of documentation.
 - 4) Entries will occur immediately after the service is performed.
 - 5) Any late entries will be documented using the actual date the note is written with a reference to the exact date the service occurred.
 - 6) If a mistake is made in the record, a single line will be drawn through the incorrect information, "error" will be written above the entry, and the provider's initials and date will be noted. Liquid paper, or any kind of marking over an error so it cannot be read, is not appropriate in any circumstance as it may invalidate the entire record in a legal proceeding.
- F. All records will be destroyed in accordance with federal and state law and Brightlife Enhancement Services guidelines for retention and destruction as follows:
- 1) All records involved in any investigation, litigation, or audit will not be destroyed until legal counsel has confirmed that no further legal reason exists for retention of the record.
 - 2) In the event a legal proceeding is initiated against Brightlife Enhancement Services, the records staff will be notified immediately by the CEO to stop the destruction of files.
 - 3) Prior to the destruction of records, the following information will be gathered from the record and permanently maintained for all persons served:
 - a. Person's name.
 - b. Social Security number.
 - c. Date of birth.



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- d. Dates of admission and discharge.
 - e. Name and address of legal guardian, if any.
- 4) All records will be destroyed in a manner that eliminates the possibility of reconstruction of the information.
 - 5) Paper records will be destroyed by one of the following methods: shredding, burning, pulping, or pulverizing.
 - 6) Microfilm and microfiche will be destroyed by recycling or pulverizing.
 - 7) Computer files will be permanently destroyed through reformatting the disc or overwriting the data. Deleting files will not be utilized as the information remains within the system. In addition, all back-up tapes of records will be overwritten.
 - 8) Any CD-RW disks that contain document imaging that cannot be overwritten will be destroyed through pulverization.
 - 9) All activities related to the destruction of records will be documented and maintained by the records staff. The following information will be included in the documentation of the destruction:
 - a. The date of the record destruction.
 - b. The method of destruction.
 - c. A description of the records that were destroyed.
 - d. The start and end date of the records.
 - e. The signatures of the individual conducting the destruction and of the witness of the action.
 - 10) Any contracted services for the destruction of Brightlife Enhancement Services records will be provided according to the following contractual guidelines:
 - a. The method of destruction will be specified.
 - b. The time between the acquisition and destruction of the records will be specified.
 - c. Established safeguards to protect the confidentiality of the records will be described and noted.



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- d. Appropriate insurance coverage will be maintained and documented by the contractor to protect Brightlife Enhancement Services from loss in the event of an unauthorized disclosure.
- e. The contractor will provide proof of destruction.

V 1.0 reviewed 06/2025