

**UNIVERSITY OF WISCONSIN SYSTEM
HEALTH SERVICES
GENERAL RECORDS SCHEDULE**

APRIL 2009



UNIVERSITY OF WISCONSIN SYSTEM: GENERAL RECORDS SCHEDULES FOR HEALTH SERVICES

I. INTRODUCTION AND PURPOSE

The University of Wisconsin System comprises fifteen distinct institutions, many of which create and receive records that are similar in purpose and utility. In the interest of efficiency, therefore, this records schedule identifies categories of records resulting from processes commonly associated with health services. The identified processes are common to all University of Wisconsin institutions.

This document also provides guidance to University System employees regarding what does and does not comprise a public record, which will in turn allow University employees to retain for a discrete time period and thereafter destroy expired public records, as well as those materials that do not comprise public records.

II. PATIENT HEALTH CARE RECORDS

- a. **Definition.** The Wisconsin statutes define patient health care records as “all records related to the health of a patient prepared under the supervision of a health care provider.” Wis. Stat. 148.81 (4)
- b. **Health care provider.** Under statute, health care providers include nurses, physicians and physician assistants, physical therapists, athletic trainers, pharmacists, social workers, professional counselors and speech language pathologists or audiologists. Wis. Stat. 146.81 (1+4)
- c. **Confidentiality.** Federal and state statutes vigorously protect the confidentiality of all patient health care records. The Wisconsin statutes read that “All patient health care records shall remain confidential. Patient health care records may be released only to the person designated in this section or to other persons with the informed consent of the patient or of a person authorized by the patient.” Wis. Stat. 146.82 (1)

III. SCOPE: The records schedules described within this document include the following records:

a. STUDENT HEALTH CENTER

- GENERAL CORRESPONDENCE
- SUBJECT FILES
- ANNUAL REPORTS
- MEETING RECORDS
- HEALTH INSURANCE RECORDS
- STUDENT HEALTH ADVISORY COMMITTEE
- STUDENT HEALTH CENTER MEDICAL FILES
- UNIVERSITY EMPLOYEE/VISITOR MEDICAL FILES
- INSTRUCTIONAL CAMP HEALTH RECORDS (NON-ATHLETIC)
- ENCOUNTER FILES
- DAILY LOG
- APPOINTMENT SCHEDULES AND STATISTICAL LOGS
- VISIT AND CODING STATISTICS
- INACTIVE HEALTH HISTORY FORM
- PHARMACY RECORDS
- LABORATORY REPORTS
- LABORATORY DAILY LOG
- IMMUNIZATION RECORDS
- STD CASE RECORDS
- TB SKIN TESTS
- QUALITY CONTROL RECORDS
- HEALTH SERVICE PROGRAMS
- WEBSITE RECORDS

b. COUNSELING CENTER

- ADMINISTRATIVE SUBJECT RECORDS
- ANNUAL REPORTS
- MEETING RECORDS
- STUDENT COUNSELING PATIENT FILES
- EMPLOYEE ASSISTANCE PROGRAM PATIENT FILES
- APPOINTMENT SCHEDULE AND STATISTICAL LOGS
- SATISFACTION SURVEYS
- COMMUNITY OUTREACH PREVENTION AND EDUCATION PROGRAMS
- WEBSITE RECORD

c. SPORTS MEDICINE

- STUDENT ATHLETE MEDICAL FILES
- STUDENT ATHLETE DIAGNOSTIC FILES
- SPORTS CAMP MEDICAL RECORDS
- WEBSITE RECORD

IV. UTILITY AND FUNCTION OF INFORMATION PROVIDED WITHIN THIS DOCUMENT.

a. Preservation of Historical Documents. Historically, University records have been preserved in paper files. Presently, however, advances in technology are beginning to present a viable alternative to paper records: electronic data stored in computer systems. Using electronic data to store University records presents a potentially fatal flaw, however, because electronic data decays over time. Thus, unlike paper records, with the passage of time electronic records lose information as it randomly slips away in byte-sized chunks, unless software updates are consistently purchased, installed, and maintained.

Because of this aspect of information technology systems, records storage within an information system must comply with the legal requirements set forth in Regent Policy Document 3-2: University of Wisconsin System Public Records Management; and Chapter Adm 12: Electronic Records Management-Standards and Requirements. Please carefully review these documents prior to storing official copies of public records upon information systems and if you have questions or concerns, then please seek assistance from the records officer at their respective University of Wisconsin institution.

b. Use of the Systems Approach. To as great extent as possible, the records schedules included within this document were developed using a systems approach. That is, the substantive information contained within an individual document, rather than the document's format, is the basis for the descriptor of each department. This is because the format for some documents is dynamic in nature and subject to administrative change. Thus, the descriptors for each document are as comprehensive as possible without relying upon format or form names.

Due to these changes, however, there may be instances in which an individual records schedule does not reflect the exact title or name of a form as used by the originator of a document. In such cases, if a University employee has difficulty determining whether a document comprises a record by reviewing the descriptive information contained within both the document and a records schedule, then employees seek assistance from the records officer at their respective University of Wisconsin institution.

c. Minimum Retention Established and Permanent Retention

Procedure. The records schedules included within this document establish minimum retention periods for each type of record. The disposition of each record is assumed to be destruction after its minimum retention period. However, expired records may be retained, for as long as they are needed as a resource for performing future projects on behalf of the University of Wisconsin.

d. Materials That Do Not Comprise Public Records. Under Wisconsin law, many materials do not comprise public records. Therefore, non-records should be retained only so long as they are useful as a resource for performing the transaction of public business on behalf of the University of Wisconsin System. Thereafter, in the interest of efficiency and proper resource management, they must be destroyed.

The following materials are not public records, under Wis. Stats. §§ 16.61 and 19.35.

- 1. Duplicates.** Public records do not include duplicate copies of records, the original copies of which are in the custody of an office contained within the University of Wisconsin System Administration, and which are maintained by a University employee only for convenience or reference and for no substantive purpose.
- 2. Unsolicited Notices or Invitations.** Public records do not include unsolicited notices or invitations received by a University employee, which are not related to any official action taken, proposed, or **considered** by the University of Wisconsin System.
- 3. Drafts, Notes and Preliminary Computations.** Public records do not include drafts, notes, preliminary computations, and like materials, but only if they are intended for personal use by a University employee or prepared by a University employee in the name of the person for whom the employee is working.
- 4. Routing Slips and Envelopes.** Public records do not include Routing slips and envelopes.
- 5. Personal Materials.** Public records do not include materials that are the personal property of a University employee and that have no relation to his or her office.

Please note that non-records should be destroyed as soon as possible, concurrent with the time at which they are no longer useful as a resource for performing the transaction of public business on behalf of the

University. Moreover, personal materials should neither be created nor retained by a University during the regular course of business.

Also note that if non-records are retained beyond the time they are no longer useful as a resource for performing the public business on behalf of the University, then under Wisconsin law, duplicates, unsolicited notices, invitations, routing slips and envelopes would have to be turned over to a requester in response to a relevant public records request, and in response to audit or litigation proceedings. Wis. Stat. §§ 19.35, 19.35, and 804.01. Moreover, even though non-records such as drafts, notes, preliminary computations and personal materials are not subject to disclosure during litigation or audit proceedings. Wis. Stat. §§ 19.35, 19.35 and 804.01.

V. CONDITIONS AFFECTING FINAL DISPOSITION,

All recommended dispositions stated within this schedule may be carried out by University of Wisconsin institutions without further consultation or approval from the University of Wisconsin Archives, legal services, or internal audit with the following exceptions:

a. Public Records Request. If a public records request is received by an office for any record or records included within this schedule, then the record (s) cannot be destroyed until the request is granted, or until at least sixty days after the date the request is denied. Court orders may extend this time period. If necessary and upon request, the Office of General Counsel will provide guidance to University of Wisconsin institutions regarding public record requests.

b. Litigation or Audit. Each University of Wisconsin institution must not only retain records that are the subject of pending litigation or audit, but also suspend any disposition until such time as the litigation or audit is completed. In order to be valid, however, requests for records relating to open audit must be filed with the affected University of Wisconsin institution. And if that institution is not apprised of pending litigation or audit, then that department is not responsible for retaining records longer than the retention periods specified within this document.

c. Disposal of Health Care Records. No patient health care records shall be deleted or destroyed without the health care provider promulgating one of two public notice procedures:

“Provide notice to each patient or person authorized by the patient whose records will be destroyed, that the records pertaining to the patient will be deleted or destroyed. The notice shall be provided at least 35 days prior to deleting or destroying the records, shall be in writing and shall be sent, by 1st class mail, to the last-known address of the patient to whom the records pertain or the last-known address of the person authorized by the patient. The notice shall inform the patient or person authorized by the patient of the date on which the records will be deleted or destroyed, unless the patient or person retrieves them before that date, and the location where, and the dates and times, when, the records may be retrieved by the patient or the person.”

OR

“Publish under ch. 985, a class 3 notice in a newspaper that is published in the county in which the health care provider’s or decedent’s health care practice is located, specifying the date on which the records will be deleted or destroyed, unless the patient or person authorized by the patient retrieves them before the date, and the location where, and the dates and times when, the records may be retrieved by the patient or person.” Wis. Stat. 146.819.

**UNIVERSITY OF WISCONSIN SYSTEM HEALTH SERVICES
GENERAL RECORDS SCHEDULE**

The University of Wisconsin System Health Services General Records Schedule applies to all University of Wisconsin institutions. In order to facilitate efficient records management for University employees, this general schedule is provided in narrative format.

I. Student Health Center (SHC)

HRS100

SHC DIRECTOR'S GENERAL CORRESPONDENCE

The record series includes all general correspondence of the Student Health Center Director. This may include statistical summaries, physician contacts and matters other than individual student health issues.

Retention Time Period

Original: Creation + additional 3 years then destroy. (Some institutions archives may consider the Director's general correspondence to have archival value. Each institution will need to make this determination.)

HRS101

SHC SUBJECT FILES

The series includes operational policies and procedures from physicians and other issues that arise with the administration of the Student Health Center.

Retention Time Period

Original: Creation + additional 5 years then destroy or destroy when superseded.

**HRS102
SHC ANNUAL REPORTS**

The annual reports document all activities of the Student Health Center on a yearly basis. The report provides financial and statistical information, summaries, accomplishments and discussion of future goals.

Retention Time Period

Original: Creation + 1 additional year and transfer to University Archives.
Copies: Destroy when no longer needed.

**HRS103
SHC MEETING RECORDS**

The record series includes meeting minutes, agendas and distribution materials of all committee and sub-committees created to assist in the management of the Student Health Center.

Retention Time Period

Original: Fiscal year + additional 3 years then destroy. (Some institutions archives may consider the meeting records to have archival value. Each institution will need to make this determination.)
Copies: Destroy when no longer needed.

**HRS104
SHC HEALTH INSURANCE RECORDS**

The records include information on health insurance plans for students which are used to explain coverage options. This includes but is not limited to enrollment, waivers, payment, COBRA, foreign government billing, correspondence and vendor accounting.

Retention Time Period

Original: Date when no longer needed for ongoing administration + additional 5 years and then destroy confidentially.
Copies: Destroy when no longer needed.

HRS105**SHC STUDENT HEALTH ADVISORY COMMITTEE RECORDS**

The record series includes meeting minutes, agendas and distribution materials related to the work of the advisory committee which serves as a liaison with the Student Health Center as well as an advocate for health outreach programs to the campus community.

Retention Time Period

Original: Creation + additional 3 years then destroy.

HRS106**SHC STUDENT HEALTH CENTER MEDICAL FILES**

The student medical files contain comprehensive information on each student who receives medical services at the Student Health Center. It may include, but is not limited to diagnostic summaries, WIR immunization reports, laboratory reports, progress notes, flow sheets, psychological reports, student immunization records, medical records from other facilities, notices of privacy practices and disclosures.

Retention Time Period

Original: Last semester of attendance + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat 146.819.

HRS107**SHC UNIVERSITY EMPLOYEE/VISITOR MEDICAL FILES**

The files contain comprehensive medical information on each University employee or visitor treated for emergency or occasional treatment at the Student Health Center.

Retention Time Period

Original: Date of last visit + additional 7 years and then destroy confidentially. There are longer retention periods required by OSHA if the University employee is injured while on the job. No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS108

SHC INSTRUCTIONAL CAMP HEALTH RECORDS (NON-ATHLETIC)

The records consist of health records and consent forms generated by the Student Health Center for all individuals attending UW System sponsored camps. The records may include individual and family histories, health questionnaires, physical examination results, and X-ray and laboratory reports as well as signed consent forms to allow for medical treatment and medicinal dispensing. This series does not apply to sports camps.

Retention Time Period

Original: Last year of enrollment + additional 7 years and then destroy confidentially. If a minor, the records must be kept for 7 years after the participant reaches the age of 18.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS109

SHC ENCOUNTER FILES

The record series created at some institutions documents a student's first encounter at the Student Health Center. The series includes demographic, procedural, diagnostic and billing information for each patient during their initial visit.

Retention Time Period

Original: Date of last visit + additional 3 years and then destroy confidentially.

HRS110

SHC DAILY LOG

The daily log includes the name of each patient, the name of the medical personnel attending the patient and the medical problem or treatment.

Retention Time Period

Original: Creation + additional 2 years and then destroy confidentially.
No patient health records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS111**SHC APPOINTMENT SCHEDULES AND STATISTICAL LOGS**

The series includes a weekly schedule for each nurse and physician and the name of the patient seen. It also includes a log for laboratory tests and results, log of physician's appointments, which also includes the patient's name, diagnosis, laboratory work and treatment.

Retention Time Period

Original: Creation + additional 5 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS112**SHC VISIT AND CODING STATISTICS**

The records series includes appointments, schedules, physician information, coding, invoices, billings, patient accounts, reporting and payment posting.

Retention Time Period

Original: Creation + additional 7 years and then destroy confidentially.

HRS113**SHC INACTIVE HEALTH HISTORY FORM**

The record series contains health history forms completed by every student at the start of their enrollment. This series covers the forms on individuals who never made an appointment at the Student Health Center. The other forms are included in the student's medical record file.

Retention Time Period

Original: Last semester of attendance + additional 5 years and then destroy confidentially.

HRS114
SHC PHARMACY RECORDS

This series created at some institutions contains prescriptions for pharmaceuticals written by the medical staff of the Student Health Center for patients. The records include the type of medication, the dose and quantity of the medication, when the medication was dispensed and the name of the medical staff person who dispensed it.

Retention Time Period

Original: Date of last visit + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS115
SHC LABORATORY REPORTS

The laboratory reports include all laboratory tests and their results completed on each patient at the Student Health Center even though a copy is also placed in each patient's medical file.

Retention Time Period

Original: Place in the patient's medical file.
Copies: Creation + additional 3 years and then destroy confidentially.

HRS116
SHC LABORATORY DAILY LOG

This log documents procedures done in the laboratory and contains the patient's name, the name of the medical personnel, who attended the patient, and the prescribed treatment.

Retention Time Period:

Original: Last semester of attendance + additional 3 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS117
SHC IMMUNIZATION RECORDS

The record series contains all immunizations conducted by the Student Health Center.

Retention Time Period

Original: Last semester of attendance + 10 years and then destroy confidentially. Permanent retention is in the Master Patient Index. (Indices)

HRS118
SHC STD CASE RECORDS

The records include all associated material which documents a positive case of sexually transmitted disease (STD) on campus. The records may include test requisitions, test analytics reports, quality control analytics and other documentation required to verify the report.

Retention Time Period

Original: Send to the Wisconsin Department of Health and Family Services
Copies: Date of test + additional 3 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HR119
SHC TB SKIN TESTS

These records created at some institutions contain the results of all TB skin tests conducted at the Student Health Center.

Retention Time Period

Original: Last semester of attendance + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HR120
SHC QUALITY CONTROLS RECORDS

Record series contains Student Health Center studies which are utilized to improve the quality of health care. They include, but are not limited to, quality studies, peer review and case review, risk management reports, satisfaction surveys and National College Health Assessments. It also includes a complaint form on an optional basis for any patient to complete. The form includes the date, nature of the complaint and a comment section. The staff persons name and the patients name are optional.

Retention Time Period

Original: Creation + additional 3 years then destroy.

HRS121
SHC HEALTH SERVICE PROGRAM RECORDS

The records series contains materials on various educational programs, reports and correspondence provided by the Student Health Center. This may include posters, circulars, contests and other preventive health care initiatives.

Retention Time Period

Original: Creation + additional 3 years and then destroy. Program material, however, on significant public health issues should be offered to University Archives. If questions arise the Student Health Directors should consult with their University Archivists, regarding what constitutes a significant public health issue.

Copies: Destroy when no longer needed.

HRS122
SHC WEBSITE RECORDS

The Student Health Center website provides current information on services, emergency procedures, health promotion and self-care guides. It also provides information on patient confidentiality, health insurance, medical records and available vaccines.

Retention Time Period

Original: Destroy when website information is no longer current for student health care information or of use to the public.

II. Counseling Center (CC)

HRS123

CC ADMINISTRATIVE SUBJECT FILES

The record series includes all correspondence and policies and procedures that deal with the administration of the Counseling Center created by the Director.

Retention Time Period

Original: Creation + additional 5 years and then destroy. (Some institutions may consider administrative subject files to have archival value. Each institution will need to make this determination.)

HRS124

CC ANNUAL REPORTS

The Director prepares an annual report which documents all activity of the Counseling Center on a yearly basis. The report includes statistical information.

Retention Time Period

Original: Creation + 1 academic year and transfer to University Archives.
Copies: Destroy when no longer needed.

HRS125

CC MEETING RECORDS

The records series includes meeting minutes, agendas and distribution of materials of all committees and sub-committees created to assist in the management of the Counseling Center.

Retention Time Period

Original: Fiscal year of meeting + additional 3 years than destroy. (Some institutions archives may consider the meeting records to have archival value. Each institution will need to make this determination.)
Copies: Destroy when no longer needed.

HRS126
CC STUDENT COUNSELING PATIENT FILES

This record series represents the main student health care record for the counseling center. Student files include counselor's notes and reports, psychological test results, referral records, correspondence with referring agencies, release forms, security reports and additional information gathered about the client in the course of counseling. The files are used for crisis intervention, monitoring progress and as a resume for future treatment by other professionals.

Retention Time Period

Original: Last semester of attendance + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS127
CC EMPLOYEE ASSISTANCE PROGRAM PATIENT FILES (EAP)

The record series represents the main employee health record for the counseling center. Employee assistance files contain comprehensive information on each university employee who receives counseling services through the EAP. It includes the counselor's notes and reports, referral records, correspondence with referring agencies, release forms, security reports and additional information gathered about the client in the course of counseling. The files are used for crisis intervention, monitoring progress and as a resume for future treatment by other professionals.

Retention Time Period

Original: Last appointment date + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS128
CC APPOINTMENT SCHEDULE AND STATISTICAL LOGS

The record series includes weekly appointment sheets for each counselor with the name of the client, date and time. The statistical logs are compilations of the weekly appointment sheet used for end-of-the month reports.

Retention Time Period

Original: Creation + additional 2 years then destroy confidentially.

HRS129
CC SATISFACTION SURVEYS

Surveys record client satisfaction with Counseling Center services, counselors and admission procedures.

Retention Time Period

Original: Creation + additional 3 years then destroy confidentially.

HRS130
CC COMMUNITY OUTREACH PREVENTION AND EDUCATION PROGRAM RECORDS

Record series includes materials on community outreach prevention and education programs. This includes but is not limited to posters, circulars, contest materials as well as program related reports.

Retention Time Period

Original: Creation + additional 3 years then destroy. Program material, however, on significant public health issues should be offered to the University Archives.

Copies: Destroy when no longer needed.

HRS131
CC WEBSITE RECORD

Counseling Center website provides information on current services, emergency/crisis, and self-help. It also promotes diversity and a commitment to multi-cultural values.

Retention Time Period

Original: Destroy when website information is no longer current for Counseling Center care issues or of use to the public.

III. Student Athletics (SA)

HRS132

SA STUDENT ATHLETE MEDICAL FILES

Series represents the main student athlete health record for athletics programs. Student athlete medical files contain health physicals, health history questionnaires, physician notes, injury evaluations, injury rehabilitation, diagnostic imaging results, operative reports, operative pictures, health insurance information and any other health material.

Retention Time Period

Original: Last semester of attendance + additional 7 years and then destroy confidentially.
No patient health care records, however, shall be destroyed without notification to the patient. See Wis. Stat. 146-819.

HRS133

SA STUDENT ATHLETE DIAGNOSTIC TESTS

The record series includes MRI's, X-Rays, Bone scans and CT scans. The tests are filed alphabetically by team sport for active student athletes and alphabetical only for non-current student athletes.

Retention Time Period

Original: Last semester of eligibility + additional 7 years and then destroy confidentially.
No patient health care records shall be destroyed, however, without notification to the patient. See Wis. Stat. 146.819.

HRS134

SPORTS CAMP MEDICAL RECORDS

Medical records consist of a health history form which is required for each person enrolled in a sports camp sponsored by a UW System institution. The form includes date of last physical examination, immunization records, allergic reactions and identification of any existing medical problems.

Retention Time Period

Original: Year of participation + additional 4 years and then destroy confidentially.
No patient health care records shall be destroyed, however, without notification to the patient. See Wis. Stat. 146-819.

HRS135

SA WEBSITE RECORD

The website provides information for all medical services offered to student athletes. The services include, but are not limited to, prevention, evaluation, the treatment of injuries, rehabilitation, pre-participation exams, drug education and counseling.

Retention Time Period

Original: Destroy when website information is no longer current for sports medicine services or of use to the public.

