



<p>Team Name: Health Information Services</p> <p>Team Lead: Regional Manager Health Information Services</p> <p>Approved by: VP – Finance and Planning</p>	<p>Reference Number: ORG.1410.PL.402</p> <p>Program Area: Health Information Services</p> <p>Policy Section: Health Information</p>
<p>Issue Date: January 31, 2017</p> <p>Review Date:</p> <p>Revision Date: January 18, 2021</p>	<p>Subject: Off-Site Storage of Records</p>

Use of pre-printed documents: Users are to refer to the electronic version of this document located on the Southern Health-Santé Sud Health Provider Site to ensure the most current document is consulted.

POLICY SUBJECT:

Off-Site Storage of Records

PURPOSE:

To establish a consistent procedure for Off-site storage of Personal and Personal Health Information.

BOARD POLICY REFERENCE:

Executive Limitation (EL-2) Treatment of Clients

POLICY:

- Southern Health-Santé Sud shall use only a reputable vendor specializing in information storage, protection, management and destruction.
- Programs considering off-site storage of Personal Health Information shall consult with the Regional Manager Health Information Services and Regional Privacy and Access Officer for further guidance and knowledge on existing off-site storage contracts and agreements.
- Records that are not governed by the Personal Health Information Act (PHIA), but are collected during daily operations such as minutes of meetings and statistical reports shall not be stored Off-site without consultation Regional Manager Health Information Services and Regional Privacy and Access Officer.
- The Regional Privacy & Access Officer shall ensure an Information Managers Agreement (IMA) is in place when information will be processed, stored, or destroyed by an external individual or body other than the Trustee that collected the information.
- Each program is responsible for off-site storage costs.
- Each program shall establish criteria to determine what records will be sent for Off-site storage. Review Policy ORG.1410.PL.201 Retention and Destruction of Personal Health Information to determine the destruction date of Personal Health Information and policy

ORG.1410.PL.202 Retention and Destruction of Non-Client Records for destruction of corporate information to assist at considering what records will be shipped Off-site as some records may be eligible for destruction.

- Inactive Health Records may be selected for archiving if there has not been an encounter at the site for at least 10 years or at the discretion of the program lead.
 - The Health Records of deceased clients may be selected for archiving but not less than one year following the date of death.
 - If applicable, Non Stress Test (NST) recordings may be selected for archiving but not less than two years following the recording.
- Each program must designate a program lead to work in conjunction with vendor to assist with the requirements of the setting up the Off-site storage to ensure program needs are met.
 - Guidelines for the preparation, data entry, submission, retrieval and destruction of records with an Off-site vendor must exist for all programs utilizing an Off-site storage vendor.
 - Each program must designate an Access Coordinator who will work in conjunction with the vendor. The Access Coordinator shall ensure all users have received an orientation and is responsible to provide or revoke user rights.
 - A database of the records in storage shall be maintained by the vendor.
 - Information archived Off-site shall be retrievable within 48 hours.
 - The vendor shall be made aware of the destruction date of all records maintained by the vendor. Policy ORG.1410.PL.201 Retention and Destruction of Personal Health Information shall be followed in determining the destruction date of Personal Health Information and policy ORG.1410.PL.202 Retention and Destruction of Non-Client Records for destruction of corporate information.
 - Records shall be stored in storage cartons specifically designed for the storage of paper records.

DEFINITIONS:

PHIA Definitions - ORG.1411.PL.502.SD.01

Access Coordinator – Individual responsible for receiving and reviewing requests to assign or revoke user rights. This role is also responsible for the addition of new departments and divisions with the vendor and is a contact between the organization and vendor.

Accounts Manager – Person employed by the vendor to meet and manage the requirements of the organization.

Authorized User: A person assigned the rights to request the destruction of Records or to permanently remove Records at Iron Mountain.

Health Record – Refers to the client record used in the clinical area/program i.e. PCH, Medicine, Home Care, and Palliative. The Health Record may be referred to as the Client Chart during the daily operations of a Health Care Facility.

Information Managers Agreement: A contractual agreement between the Trustee and the Information Manager (the Vendor) outlining the expectations of the Trustee for the Information Manager under the *Personal Health Information Act*.

Inactive Health Records: A Health Record may be deemed inactive when a reasonable amount of time has passed since the client's last encounter and the current date.

Off-site: A site not governed by Southern Health-Santé Sud.

PROCEDURE:

SETUP FOR OFF-SITE STORAGE AND ADDING/DELETING USERS

1. Once an agreement/contract is in place with Vendor (Iron Mountain), Division and Departments are required for set up. The program lead/manager or designated Access Coordinator will contact the vendors' Accounts Manager to add new accounts (divisions and departments). Complete forms ORG.1440.PL.402.FORM.01 Iron Mountain – Request to Add New Division and ORG.1410.PL.402.FORM.02 Iron Mountain – Request to Add New Department.
2. To add or delete users complete the ORG.1410.PL.402.FORM.03 *Iron Mountain Access Form Request to Add or Delete User* and submit to the Access Coordinator, who will submit to the Vendor's Accounts Manager.
3. Further details are located in the Manage Organizations and Manage Users Sections within the following link: <https://www.ironmountain.com/support/iron-mountain-records-connect/imcrm-howtos>

PREPARING RECORDS FOR OFF-SITE STORAGE

1. Determine records eligible for archiving.
2. Review all documents within the record to ensure they are for the correct client.
3. For archiving non-acute care health records proceed to #6.
4. If applicable, remove all blood administration and blood product reports within the acute care record dated prior to January 2015. Label on the front of the volume(s) on the bottom right that will communicate the volume(s) have been prepared for shipment and any existing blood product/blood administration documents have been removed. As well, note if there was no evidence of blood product/blood administration documents.
5. Health Records shipped for storage shall be out guided indicating location.
6. File Records in an archive box for shipment. Affix the vendor's barcode label and mark the customer ID number on the box. The second part of a label is not required and may be discarded.
7. Authorized Users will have access to the Iron Mountain Connect portal for facilities on contract to use Iron Mountain long term Off-site record storage & retrieval system.
8. Complete data entry of the archived box and contents into the vendor's portal following procedure ORG.PL.402.SD.02 Iron Mountain Adding Boxes and Files.

9. Once all archived boxes have been entered, they are ready for pick up by Iron Mountain. Follow procedure ORG.1410.PL.402.SD.03 Iron Mountain Creating a Pickup Order.
10. For the retrieval of Records, boxes and files refer to ORG.1410.PL.402.SD.04 Iron Mountain Searching in the Records Center.
11. For record destruction, refer to ORG.1410.PL.402.SD.05 Iron Mountain Permanent Withdrawal and Destruction.
12. For any reports and invoices refer to ORG.1410.PL402.SD.01.
13. For additional reference materials including ordering supplies refer to Iron Mountains Connect Records Management How To's at:
<https://www.ironmountain.com/support/iron-mountain-records-connect/imcrm-howtos>.

SUPPORTING DOCUMENTS:

- [ORG.1410.PL.402.FORM.01](#) Iron Mountain – Request to Add New Division
[ORG.1410.PL.402.FORM.02](#) Iron Mountain – Request to Add New Department
[ORG.1410.PL.402.FORM.03](#) Iron Mountain Access Form Request to Add or Delete User
[ORG.1410.PL.402.SD.01](#) Iron Mountain Requesting Reports
[ORG.1410.PL.402.SD.02](#) Iron Mountain Adding Boxes and Files
[ORG.1410.PL.402.SD.03](#) Iron Mountain Creating a Pickup Order
[ORG.1410.PL.402.SD.04](#) Iron Mountain Searching in the Records Center
[ORG.1410.PL.402.SD.05](#) Iron Mountain Permanent Withdrawal and Destruction

REFERENCES:

IERHA Retention & Destruction of Personal Health Information – September 2015