

 <p style="text-align: center;"><b>DIVISION OF ADULT INSTITUTIONS</b></p> <p style="text-align: center;"><b>POLICY AND PROCEDURES</b></p>	<b>DAI Policy #:</b> 500.50.06	<b>Page</b> 1 of 10
	<b>Original Effective Date:</b> 09/23/93	<b>New Effective Date:</b> 09/11/24
	<b>Supersedes:</b> 500.50.06	<b>Dated:</b> 03/20/23
	<b>Administrator's Approval:</b> Sarah Cooper, Administrator – 08/08/24	
	<b>Required Posting or Restricted:</b>	
<input checked="" type="checkbox"/> <b>PIOC</b> <input checked="" type="checkbox"/> <b>All Staff</b> <input type="checkbox"/> <b>Restricted</b>		
<b>Chapter:</b> 500 Health Services		
<b>Subject:</b> Management of DOC Health Care Records		

## POLICY

The Division of Adult Institutions shall ensure PIOC Health Care Record is readily available to health professionals for all health encounters to ensure continuity of care during incarceration and upon movement between DOC facilities. It shall be reactivated upon readmission, and retained in compliance with applicable laws upon release, escape or death.

## REFERENCES

Standards for Health Services in Prisons, National Commission on Correctional Health Care, Essential 2018, P-A-08 Health Records

DAI Policy 300.00.09 – Death of an Inmate

DAI Policy 500.30.06 – Transfer of Patient

DAI Policy 500.50.02 – Health Care Record Format, Content and Documentation

DAI Policy 500.50.01 – Minimum Necessary and Duty to Mitigate HIPAA Standards

DAI Policy 500.50.22 – Search Procedures for Missing Active Health Care Records and Creation of Replacement Records

DAI Policy 500.70.08 – Wisconsin Resource Center Transfers

Attachment A – Movement of HCR Checklist

Wis. Statutes s. 302.38 – Medical Care of Prisoners

## DEFINITIONS, ACRONYMS AND FORMS

Active Health Care Record – Health Care Record relating to PIOC residing in a DOC correctional facility.

BHS – Bureau of Health Services

Central Medical Records (CMR) – Unit at DCI that stores all inactive HCRs, responds to requests for information from inactive DAI HCRs, and destroys HCRs in accordance with legal requirements.

DAI – Division of Adult Institutions

DCI – Dodge Correctional Institution

Dentrix – Electronic Dental Record

DHS – Department of Health Services

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DOC-2077 – Health Transfer Summary

DOC-3003 – Health Summary

DOC-3351 – Record Transfer Verification

DOC-3532 – Transfer Screening

DOC-3692A – Health Care Record Search Upon Transfer

DSU – Dental Services Unit

EMR – Electronic Medical Record, created and maintained for each PIOC including all or some of the following records: Medical Chart, Medications Record envelope, Patient Request Folder, Psychological Services Unit Record, Substance Use Disorder Record and any other electronic records as defined by the Bureau of Health Services.

Health Care Record (HCR) – Official confidential DOC records include both EMR and Historical Paper Chart.

Health Information Supervisor – Person responsible for managing the HCRs for DOC PIOC—with emphasis on release of information and EMR utilization oversight. This includes tasks such as approving extensions for PIOC HCR file review requests, and responsibility for initial review of PIOC complaints involving potential HIPAA violations.

Health Services Unit (HSU) – Work unit that includes the advanced care providers, dentists, nurses and support staff who provide health care services to PIOC residing in a DAI facility.

Historical Paper Health Care Record (HCR) – Paper Health Care Record created and maintained for each PIOC including all or some of the following components: Medical Chart, Dental Record, Psychological Records-Copies Envelope, Medications Record Envelope, Patient Request Folder, Psychological Services Unit Record, and other components as defined by the Bureau of Health Services

HIPAA – Health Insurance Portability and Accountability Act

Inactive Health Care Record – HCR relating to PIOC previously incarcerated in a DAI facility. Inactive HCRs are stored and maintained at CMR.

MMHI – Mendota Mental Health Institute

PIOC – Persons in our care

PRF – Patient Request Folder

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Psychological Services Unit (PSU) – Work unit that includes the psychologists and support staff who provide psychological services to PIOC residing in a correctional facility.

PSU Record – Portion of the HCR containing all documentation related to psychological services provided to PIOC while incarcerated in DOC institutions such as: psychological assessments, group therapy notes, reports, PIOC correspondence, restricted folder contents, and sex offender treatment documentation.

SUD – Substance Use Disorder

WICS – Wisconsin Integrated Corrections System

WMHI – Winnebago Mental Health Institute

Wisconsin Resource Center (WRC) – WI Department of Health Services (DHS) facility accepting PIOC referrals from DOC for further psychological treatment and evaluation. The DOC paper HCR (if present) follows PIOC to WRC, and WRC may release the DOC HCR upon request with proper authorization. WRC is the custodian of any medical documentation created while PIOC remain housed at WRC. Upon release or transfer back to DOC, the DOC paper HCR returns to CMR.

WWRC – Wisconsin Women’s Resource Center

## **PROCEDURES**

### **I. Access to HCR During Incarceration**

- A. The method of recording entries in the health care record (HCR), contents and format are approved by the responsible health authority/designee.
- B. The HSU, PSU, SUD and DSU departments at each facility shall maintain the HCR and make readily available to health professionals for PIOC encounters.

### **II. General Instructions**

- A. The Historical Paper HCR along with each component of the record must stay/travel with PIOC. The Historical Paper HCR together with each component of the record must remain at the facility, institution or center PIOC are currently at until transfer, release or death.
- B. Components of the Historical Paper HCR include:
  1. PSU – Psychological Services Unit Record
  2. SUD - Substance Use Disorder Treatment/Department Record
  3. DSU - Dental Services Unit Record (Dental folder)
  4. Medications Record Envelope
  5. Psychological Record – Copies Envelope
- C. HSU, PSU, SUD, and DSU departments at each facility shall develop procedures for efficient, prompt and confidential movement of the entire

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Historical Paper HCR upon transfer between DOC facilities and to the Wisconsin Resource Center (WRC) or Wisconsin Women's Resource Center (WWRC) to ensure continuity of care and notification of critical and chronic health needs of PIOC.

- D. HSU, PSU, SUD, and DSU departments at each facility shall develop procedures for efficient prompt and confidential movement of the entire Historical Paper HCR to DCI-CMR for storage upon release, transfer to federal jurisdiction, placement out-of-state, or escape of PIOC.
- E. HSU, PSU, SUD, and DSU departments at each facility shall develop procedures for efficient, prompt and confidential movement of the entire Historical Paper HCR to CMR the next business day following a death according to DAI policy 300.00.09.

### **III. Sending Facility: Transfer of PIOC to another DOC Facility or to WRC/WWRC**

- A. Sending HSU department shall:
  1. Each HSU shall maintain an adequate supply of BHS approved records transfer bags by ordering the records transfer bags from DCI Primary Care. Milwaukee Secure Detention Facility purchases bags separately.
  2. Check appointment list for future appointments and verbally notify the receiving facility health staff of any scheduled off-site appointments.
  3. Retrieve and scan all loose documents (e.g., flow sheets, medication records, off-site consultations) in appropriate sections of PIOC EMR. No documents should remain at sending facility.
  4. See Attachment A – Movement of HCR Checklist. Follow all steps listed on the Attachment. CMR retains in storage the oldest chart volumes when PIOC has four or more volumes, resulting in HSUs only having the most recent three volumes.
  5. Ensure the Medications Envelope, Psychological Records – Copies Envelope are, and Patient Request Folder are included in the Historical Paper HCR.
  6. Gather the Historical Paper HCR and all the received components of the record (PSU Records, SUD Records, and DSU Records) and prepare to transfer with PIOC.
- B. Sending PSU department shall:
  1. Ensure any current paper documents are scanned properly into the appropriate sections of the EMR - PSU Record.
  2. Enter the date of the transfer on PSU Record (on yellow envelope or on front cover of green multi-section hard cover) if PSU staff is on-site at the time of the transfer.
  3. Deliver the prepared Historical Paper PSU record to HSU to be ready for transport.
    - a. If the PSU department houses the Historical Paper SUD records follow the SUD department steps for transport prep and delivering both the

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prepared Historical Paper PSU and SUD records to HSU to be prepared for transport.

- C. Sending SUD department shall (PSU Responsible if facility does not have a SUD department):
  - 1. Ensure any current paper documents are scanned properly into the appropriate sections of the EMR - SUD Record.
  - 2. Enter the date of date transfer on SUD Record
  - 3. Deliver the prepared Historical Paper SUD record to HSU to permit transport.
    - a. If the PSU department houses the Historical Paper SUD records see above (B. 3a)
  
- D. Sending DSU department shall:
  - 1. Ensure any current paper documents are scanned properly into the appropriate area of Dentrrix.
  - 2. Enter the date of the transfer on DSU Record (on manila envelope or on front cover of multi-section hard cover, no dates needed on green plastic envelopes) if DSU staff is on-site at the time of the transfer.
  - 3. Deliver the prepared Historical Paper DSU record (or Green plastic envelope) to HSU to be prepared for transport.
  
- E. Packing the Record Transfer Bag
  - 1. Place all components of PIOC Historical Paper HCR in a Record Transfer bag and lock it as required to ensure confidentiality of the information; one HCR per bag.
  - 2. Label each bag with the DOC-3351 – Record Transfer Verification indicating which components of the HCR are enclosed and the sending/receiving locations.
  
- F. If the Historical Paper HCR does not accompany PIOC at the time of transfer to a DAI facility, or WRC/WWRC, HSU shall:
  - 1. Complete the DOC-2077 – Health Transfer Summary and fax or scan to the receiving facility on the day of transfer, in the event of EMR downtime.
  - 2. Send all components of Historical Paper HCR within 24 hours via overnight mail or via DOC transport utilizing a tracking number.

**IV. Receiving Facility: Transfer of PIOC to a DOC Facility or to WRC/WWRC**

- A. Complete the appropriate sections of the DOC-3532 – Transfer Screening F-00946 WRC/WWRC Medical Clearance per DAI Policy 500.70.08.
  
- B. Verify all components of the Historical Paper HCR have been received, if applicable, and contact the sending facility as soon as possible if some components did not arrive with PIOC. Vital information to the proper care of PIOC may be contained in the missing records.

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1. Contact the HSU, PSU, SUD and/or DSU departments of the sending facility to request that missing component(s) of the Historical Paper HCR be sent immediately.
2. See DAI Policy 500.50.22 for steps to take to search for missing Historical Paper HCRs.

**V. Temporary Transfer of PIOC to County Jail**

- A. The Historical Paper HCR should remain at the facility PIOC transferred out of until they return from the jail. If PIOC are transferred from jail to another facility the receiving facility will then reach out the previous transferring facility and request the Historical Paper HCR.
- B. Court Appearance - Upon notice of a temporary transfer of PIOC to a county jail, the HSU shall complete the statutorily required DOC-2077 – Health Transfer Summary that identifies critical and chronic health needs of PIOC.
- C. Placement in temporary lock-up from a correctional center to a county jail:
  1. When a nurse is available at the time of the transfer, the nurse shall:
    - a. Gather together and place all parts of the Historical Paper HCR and file on the departments shelf.
    - b. Pull standard set of records for PIOC from EMR utilizing the specific HSU Jail Contract template from Cerner (EMR) Report Request. Send the record set to the jail.
    - c. Retrieve PIOC medications for transfer with PIOC.
  2. When a nurse is not available at the time of the transfer, an officer shall do the tasks under sub-section 1.a and 1.b. above, except the officer only gathers the staff-controlled medications and keep-on-person medications in the possession of PIOC.

**VI. Release, Transfer to Federal Jurisdiction, Out-of-State or Escape of PIOC**

- A. HSU department shall:
  1. Complete the AdHoc Powerform Health Summary (3003/3314)
    - a. In case of downtime complete the paper version of the Health Summary (3003/3314) and scan into the EMR scanning folder - PR Correspondence section.
    - b. If someone other than a registered nurse completes the Health Summary, a registered nurse must review and co-sign.
    - c. Provide a copy of the Health Summary to PIOC upon release, or to a federal transporting officer in a sealed envelope, addressed to the health services staff at the receiving federal facility.
  2. Upon notice PIOC are moving to an out of state or federal correctional facility, the HSU shall provide requested health information to the receiving facility in accordance with Wisconsin and federal confidentiality laws if the request is received prior to the movement of the HCR to CMR.
  3. Retrieve and scan any paper documents (e.g., flow sheets, medication records, off-site consultations) into the appropriate sections of the EMR. No documents shall remain at sending facility.

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4. Ensure the Medications Envelope, Psychological Records – Copies Envelope are, and Patient Request Folder are included in the Historical Paper HCR.
  5. Once Received the Historical Paper PSU, SUD and DSU components from the departments, combine the components with the Historical Paper HCR and send to DCI-CMR upon release.
- B. Releasing PSU department shall:
1. Ensure any current paper documents are scanned properly into the appropriate sections of the EMR - PSU Record.
  2. Enter the date of date release, transfer to federal jurisdiction/out-of-state or escape on PSU Record.
    - a. Date gets entered on yellow envelope or on front cover of green multi-section hard cover.
  3. Deliver the prepared Historical Paper PSU record to HSU in a timely manner to permit transfer of Historical Paper HCR to CMR within one (1) week of the release of PIOC.
  4. If the PSU department houses the Historical Paper SUD records follow the SUD department steps for transport prep and delivering both the prepared Historical Paper PSU and SUD records to HSU in a timely manner to permit transfer Historical Paper HCR to CMR within one (1) week of the release of PIOC.
- C. Releasing SUD department shall (PSU Responsible if facility does not have a SUD department):
1. Ensure any current paper documents are scanned properly into the appropriate sections of the EMR - SUD Record.
  2. Enter the date of date release, transfer to federal jurisdiction/out-of-state or escape on SUD Record.
  3. Deliver the prepared Historical Paper SUD record to HSU in a timely manner to permit transfer of Historical Paper HCR to DCI-CMR within one (1) week of the release of PIOC.
- D. Releasing DSU department shall:
1. Ensure any current paper documents are scanned properly into the appropriate area of Dentrix
  2. Enter the date of release, transfer to federal jurisdiction, or escape on DSU Record (on manila envelope or on front cover of multi-section hard cover, no dates needed on green plastic envelopes)
  3. Deliver the prepared Historical Paper DSU record (or green plastic envelope) HSU in a timely manner to permit transfer of HCR to DCI-CMR within one (1) week of the release of PIOC.
- E. Physical movement of Historical Paper HCR and components of the record to DCI-CMR
1. Do NOT send boxes of individual record sets e.g., PSU, SUD Records, or DSU Records back to DCI-CMR. The Historical Paper HCR and **all**

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components of the Historical Paper record (PSU Records, SUD Records, and DSU Records) must be all banded together and sent as one complete record to DCI-CMR.

2. HSU will ensure the movement of the entire Historical Paper HCR within one (1) week of the movement or escape of PIOC out of the facility.
3. More than one Historical Paper HCR may be placed in a sealed bag, envelope or box. Seal securely and use only sturdy boxes/envelopes.
4. Always include name/address of sending facility on outside of bag/box.
5. Place all the components of the Historical Paper HCR for each PIOC inside the correct PIOC Historical Paper HCR or rubber band together all the components for each PIOC.
6. Send to DCI-CMR within one (1) week if release, transfer to federal jurisdiction, or escape, whenever possible, via US mail, an approved commercial mail service or via DOC transport addressed as shown below. Do not send to HSU/Primary Care.

## **VII. Death of PIOC**

- A. Follow DAI 300.00.09 (Health Care Records section)
- B. HSU shall on the first working day following the death of PIOC:
  1. Send Historical Paper HCR to include all components of the records to DCI-CMR Attn: Health Information Supervisor.
  2. Send Historical Paper HCR via certified mail with return receipt requested, bonded carrier or hand delivered by DOC staff. Do not send the HCR viPIOC transport vehicles.

## **VIII. Tracking of HCRs sent to CMR**

- A. In order to track receipt of HCRs, CMR uses an electronic tracking system that does the following:
  1. Records receipt of volumes of HCR.
  2. Records receipt of the PRF.
  3. Records receipt of the Dental Record.
  4. Records receipt of the PSU and SUD department Record(s).
- B. Individual CMR staff may send an email from their individual DOC email address to request from the releasing facility the parts of the Historical Paper HCR not received by CMR.
- C. This enables CMR to track missing Historical Paper HCR and the components after release. If missing components are identified, please refer to DAI policy 500.50.22 and form DOC-3692A. CMR will generate system-wide tracking reports for the Bureau of Records Management Director upon request, for quality improvement purposes.

## **IX. Readmission of PIOC**

- A. Upon notice of a pending admission, CMR shall retrieve the Historical Paper HCR (if applicable) for PIOC with a prior stay in a DOC facility, and provide



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the Historical Paper HCR and components to the appropriate HSU, PSU and DSU departments on the day of admission.

- B. If the Historical Paper HCR has been destroyed, and readmission to DOC occurs, a new encounter in the EMR portion of the HCR will automatically be established via WICS.
- C. DOC will proceed with PIOC only having an EMR HCR.

**X. Summary of Location of HCR**

<b>LOCATION OF HCR DURING INCARCERATION AND UPON TRANSFER, RELEASE ESCAPE OR DEATH OF PIOC</b>	
<b>LOCATION OF PIOC</b>	<b>LOCATION OF HEALTH CARE RECORD</b>
DAI Facility	DAI Facility
WRC/WWRC	WRC/WWRC
County jail contract bed	CMR
County jail – court appearance	Remains at sending DAI facility
County jail – temporary lock-up (transfer from a correctional center)	CMR
Hospital Emergency Room visit	Remains at sending DAI facility
Mendota or Winnebago Mental Health Institute for evaluation	Remains at sending DAI facility
Ch. 51 commitment at MMHI/MMHI	CMR
Ch. 980 commitment to DHS at Sandridge	CMR
Transfer to federal jurisdiction/Interstate Compact	CMR
Escape	CMR
Release to the community	CMR
Death	CMR

## DIVISION OF ADULT INSTITUTIONS FACILITY IMPLEMENTATION PROCEDURES

<b>Facility:</b> Name		
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<b>Will Implement</b> <input type="checkbox"/> As written <input type="checkbox"/> With below procedures for facility implementation		
<b>Warden's/Center Superintendent's Approval:</b>		

### REFERENCES

### DEFINITIONS, ACRONYMS AND FORMS

### FACILITY PROCEDURE

I.

- A.
  - 1.
    - a.
- B.
- C.

II.

- A.
- B.
- C.