

 <p style="text-align: center;">DIVISION OF ADULT INSTITUTIONS</p> <p style="text-align: center;">POLICY AND PROCEDURES</p>	DAI Policy #: 500.50.22	Page 1 of 14
	Original Effective Date: 08/22/13	New Effective Date: 08/22/13
	Supersedes: N/A	Dated: N/A
	Administrator's Approval: Cathy A. Jess, Administrator	
Required Posting or Restricted:		
<input checked="" type="checkbox"/> Inmate <input checked="" type="checkbox"/> All Staff <input type="checkbox"/> Restricted		
Chapter: 500 Health Services		
Subject: Search Procedures for Missing Active Health Care Records and Creation of Replacement Records		

POLICY

All Division of Adult Institution Health Services Units, Dental Services Units or Psychological Services Units shall conduct a thorough search when a component of a Health Care Record for a current inmate patient is identified as missing upon transfer or at any time during incarceration. If the search is unsuccessful, the responsible health unit shall create a replacement record pursuant to this policy.

REFERENCES

DAI Policy 500.40.03 – Dental Record Keeping Standard Format
DAI Policy 500.50.02 – Health Care Record Format, Content and Documentation
DAI Policy 500.50.03 – Establishing Additional Components of Health Care Record
DAI Policy 500.50.06 – Management of DOC Health Care Records
DAI Policy 500.70.11 – Psychological Services Unit Record

DEFINITIONS, ACRONYMS, AND FORMS

CCI – Columbia Correctional Institution

CMR – Central Medical Records

DAI – Division of Adult Institutions

DCI – Dodge Correctional Institution

Dental Services Unit (DSU) – Includes the dentists, dental assistants and support staff who provide dental care to inmate patients residing in a DAI correctional facility.

DOC-3018 – Intake Screening/Medical History

DOC-3026 – Medication/Treatment Record

DOC-3335 – Request for Protected Health Information for Ongoing Treatment

DOC-3351 – Transfer of Health Care Record Verification

DOC-3472 – Mental Health Screening Interview

DOC-3473 – Psychological Services Clinical Contact

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DOC-3563 – Notification Regarding Guardianship of the Person

DOC-3691 – Creating a Replacement Health Care Record

DOC-3692 – Health Care Record Search Procedure During Incarceration

DOC-3692A – Health Care Record Search Procedure Upon Transfer

Escribe – Contracted vendor used by DOC health care providers, primarily psychologists and psychiatrists, to dictate reports.

Health Care Record (HCR) – Official confidential DOC record created and maintained for each inmate patient consisting of all or some of the following components: gray/green Medical Chart, orange STIA Medical Chart, Hemodialysis Chart, Dental Services 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.

Health Services Unit (HSU) – Includes the physicians, dentists, nurses and support staff who provide health care services to an inmate patient residing in a DAI correctional facility.

HIPAA – Health Insurance Portability and Accountability Act of 1996

HSM – Health Services Manager

MPAA – Medical Program Assistant Advanced

OOA – Office Operations Associate

PAC – Picture Archiving Communication

PRF – Patient Request Folder

Psychological Services Unit (PSU) – Includes the psychologists and support staff who provide psychological services to an inmate patient residing in a DAI correctional facility.

SCI – Stanley Correctional Institution

TCI – Taycheedah Correctional Institution

TST – Tuberculin skin test

UPS – United Parcel Service

USPS – United States Postal Service

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WICS – Wisconsin Integrated Corrections System

WIR – Wisconsin Immunization Registry

PROCEDURE

I. Standard HCR

- A. All inmate patients shall have a HCR consisting of the following components:
1. Medical Chart.
 2. PRF.
 3. Psychological Records – Copies envelope (white).
 4. Dental Record.
 5. PSU Record.
- B. Inmate patients with prescribed medications shall have a Medications Record envelope (blue).

II. Search for Component of HCR Not Received Upon Transfer

- A. The receiving HSU, DSU and PSU work units are responsible for verifying each has received the part(s) of the HCR for which it is responsible.
- B. The HSU shall review the DOC-3351 – Transfer of Health Care Record Verification on the records bag to confirm its accuracy, and to identify any parts of the HCR not sent by the sending facility.
- C. When a HSU, DSU or PSU realizes it has not received a part of the HCR, the designated employee shall obtain a DOC-3692A – Health Care Record Search Procedure Upon Transfer.
- D. The employee who discovers a record is missing shall promptly notify the HSU, DSU or PSU supervisor.
- E. The HSU, DSU or PSU shall create a “Record Searches” folder or binder.
1. Obtain a manila folder and write “Record Searches” on the outside cover, or obtain a 3-ring binder and label it with “Record Searches”.
 2. For each search conducted, print out all sent/received emails.
 3. In alphabetical order by inmate, clip together the emails and the completed DOC-3692A and file in the “Records Search” folder or binder.
 4. Retain the folder/binder until further notice. A Records Retention Authorization will be created.
- F. Step 1 – DOC-3692A: Enter the information at the top of the form and under Step 1.
- G. Step 2 – DOC-3692A: Send an email to the sending HSU, DSU or PSU to request the sending facility search for the missing record. Do not forward the DOC-3692A to the sending facility. Retain the DOC-3692A at the searching HSU, DSU or PSU; do not attach to the email.

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1. Content of email
 - a. Subject line of email: Record Search, Inmate Name, DOC #.
 - b. Describe the missing record: e.g., Volume 2 of Medical Chart, PRF, Dental Record, PSU Record, and the date of transfer from where to where.
 - c. Ask the sending facility to respond via email within one business day stating whether or not the missing record is found, being sure to provide a contact person.
 - d. Ask the sending facility to forward a “found” record within one business day via USPS or UPS with a tracking receipt.
 - e. Example of email sent by CCI HSU to SCI HSU: “The inmate named above transferred from SCI to CCI on 05/20/13. Volume 2 of his Medical Chart was not received. Please search for the record within one business day and report the results via email being sure to include the name of a contact person. If the record is found, send within one business day to CCI via USPS or UPS with a tracking receipt.”
 - f. Include the name of the receiving/searching facility, and of a contact person and phone number in the “signature” at the end of the email.
 - g. Enter the date the email is sent under Step 2.
 - h. Enter the date sending facility responds.
 2. Go to Step 5, if sending facility reports the record has been found.
 3. Go to Step 3, if sending facility reports the record has not been found.
 4. Retain all emails sent/received in a designated “Search for Missing Records” folder/binder.
- H. Step 3 – DOC-3692A: When sending facility reports it does not have the missing record, complete this step.
1. Immediately send an email to other areas at the receiving/searching facility to ask them to search their areas in case the record was sent to the wrong location, including other health units, Records Office/Social Services, Education, Security, Property and the mailroom. Retain the DOC-3692A at the searching HSU, DSU or PSU; do not attach to the email.
 2. Content of email
 - a. Subject line of email: Record Search, Inmate Name, DOC #.
 - b. Describe the missing record: e.g., Medical Chart, Dental Record or PSU Record, and the date of transfer.
 - c. Request the search be conducted and a response email be sent within two business days, stating whether or not the record was found, and the location, such as Property or Records Office, responding.
 - d. Example of email from CCI HSU sent to other areas at same facility: “The HSU cannot locate Volume 2 of the Medical Chart of the above-named inmate who transferred to CCI on 05/20/13. Please search your area to see if the record was misdirected, and let the HSU know whether or not the record is found. Identify the location of the person responding. If found, send the record immediately.”

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- e. Include a contact name and phone number in the “signature” at the end of the email.
 - f. Enter the date email was sent under Step 3.
 2. Retain all emails sent/received and file in a designated “Search for Missing Records” folder/binder.
 3. If a location within the facility does not respond within three business days, send an reminder email asking for a response within one day. If a locations does not respond, contact the HIPAA Compliance Officer.
 4. Go to Step 6, if record is found in another location at the facility.
 5. Go to Step 4, if record is not found at another location at the facility.
- I. Step 4 – DOC-3692A: If the facility-wide search is unsuccessful, the HSU, DSU or PSU shall immediately send an email to the appropriate statewide distribution list(s) identified under this step. Retain the DOC-3692A at the searching HSU, DSU or PSU; do not attach to the email.
1. HSU and DSU shall send the email to “DOC DL DAI DCI Medical Records” which includes all HSMs, HSU MPAAAs and Nursing Coordinators, and to “DOC DL DAI WCCS HSU” to ensure the appropriate correctional center staff receive the email.
 2. PSU shall send the email to “DOC DL DAI PSU OOA”.
 3. Content of email.
 - a. Subject line of email: Record Search, Inmate Name, DOC #.
 - b. Describe the missing record.
 - c. Request the search be conducted and a response email be sent, within three business days, stating whether or not the record was found. Only facilities housing males are required to respond to a search request from a male facility. Only facilities housing females are required to respond to a search request from a female facility.
 - d. Request response emails include the name of facility and a contact person.
 - e. Request any “found” record be sent within one business day via USPS or UPS with a tracking receipt.
 - f. Example of email from CCI HSU sent to Distribution List: “Volume 2 of the Medical Chart of the above-named inmate cannot be found at CCI. All male HSUs shall search for the record within three business days, and report via email the results of the search being sure to include the name of the responding facility, and a contact person. If the record is found, send within one business day to CCI via USPS or UPS with a tracking receipt. Thank you for your assistance.”
 - g. Include the name of a contact person at the receiving/searching facility, name of the facility, and a phone number in the “signature” at the end of the email.
 4. Enter the date the email is sent under Step 4.
 5. Use the checkboxes under Step 4 to track receipt of email responses.
 - a. If a facility has not responded within four business days, send an email reminder asking for a response within one day.

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- b. Contact the HIPAA Compliance Officer if a facility does not respond.
6. Retain all emails sent/received in the "Records Searches" folder/binder per II. E. above.
7. Go to Step 6, if record is found and sent to receiving/searching facility,
8. Go to Step 5, if record is not found after all male or female facilities have responded.

J. Step 5 – DOC-3692A:

1. Use WICS/Locator to review inmate's period(s) of incarceration and compare to records on-site, if any, to determine the date range of the missing records. Enter the information under Step 5.
2. Forward the completed DOC-3692A to the HIPAA Compliance Officer.

K. Step 6 – DOC-3692A:

1. Enter the date the record is found at the receiving/searching facility, or received at the receiving/searching facility from another location.
2. It is not necessary to forward the DOC-3692A to the HIPAA Officer if the record is found. Retain the DOC-3692A in the "Search for Missing Records" folder/binder.

III. Search for Missing Component of HCR During Incarceration (Other Than at Transfer)

- A. When the HSU, DSU or PSU discovers all or part of an inmate patient's HCR is missing, designated employee shall obtain a DOC-3692 – Health Care Record Search Procedure During Incarceration.
- B. The employee who discovers a record is missing shall promptly notify the HSU, DSU or PSU supervisor.
- C. Step 1 – DOC-3692: HSU/DSU/SPU shall complete the top part of the form and enter requested information under Step 1.
- D. Step 2 – DOC-3692: Conduct a thorough search of all shelves, cabinets, offices and carts in the HSU, DSU or PSU, within two business days. Enter the date of the search.
 1. Go to Step 6, if record is found.
 2. Go to Step 3, if record is not found.
- E. Step 3 – DOC-3692: Email the other health units, and areas such as Social Services, Education, Security, mailroom and property at the facility. Do not attach the DOC-3692 to the email.
 1. Content of email.
 - a. Subject line of email: Record Search, Inmate Name, DOC #.
 - b. Describe the missing record component.
 - c. Ask that a search be conducted and an email response stating whether or not the record was found be sent within two business days.

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- d. Request email responses include the location of the person responding.
 - e. Example of email: "The PSU Record for the above-name inmate is missing. Please search your area for the missing record and respond via email within two business days stating the results of the search. Be sure to identify the location of the person responding. Thank you for your assistance."
 - f. Enter the date the email is sent under Step 3.
2. Retain all emails sent/received in the "Records Searches" folder or binder per II. E. above.
 3. If a location within the facility does not respond within three business days, send a reminder email asking for a response within one day. Contact the HIPAA Compliance Officer if a location does not respond.
 4. If the record is found, go to Step 6 entering the date the record is found.
 5. If the record is not found, go to Step 4.
- F. Step 4 – DOC-3692: If the facility- wide search is unsuccessful, the HSU, DSU or PSU shall immediately send an email to the appropriate statewide distribution list(s) under Step 4. Retain the DOC-3692 at the searching facility; do not attach to the email.
1. HSU and DSU shall send the email to "DOC DL DAI DCI Medical Records" which includes all HSMs, HSU MPAAAs and Nursing Coordinators and to DOC DL DAI WCCS HSU to ensure appropriate correctional center staff receive the email.
 2. PSU shall send the email to "DOC DL DAI PSU OOA".
 3. Content of email.
 - a. Subject line of email: Record Search, Inmate Name, DOC #.
 - b. Describe the missing record.
 - c. Request the search be conducted within three business days, and all facilities housing males respond to a search request from a male facility, and all facilities housing females respond to a request from a female facility, stating in the email whether or not the record has been located.
 - d. Example of email from OSCI PSU sent to "DOC DL DAI PSU OOA": "The PSU Record for the above-named inmate is missing. All male facilities should search for the record within three business days, and report via email the results of the search being sure to include the name of facility, and a contact person. If the record is found, send within one business day to CCI via USPS or UPS with a tracking receipt. Thank you for your assistance."
 - e. Enter the date email is sent under Step 4.
 4. Use the checkboxes under Step 4 to track responses.
 - a. If a facility has not responded within 4 business days, send an email reminder to the facility that has not responded asking for a response within one day.

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- b. Contact the HIPAA Compliance Officer if a facility does not respond.
 5. Go to Step 6, if the record is found.
 6. Go to Step 5, if the record is not found after all male or female facilities have responded.
- G. Step 5 – DOC-3692:
 1. Use WICS/Locator to review inmate’s period(s) of incarceration and compare to records on-site, if any, to determine the date range of the missing records.
 2. Forward the completed DOC-3692 to the HIPAA Compliance Officer.
- H. Step 6 – DOC-3692:
 1. Enter the date the record is found within work unit or received from another location.
 2. It is not necessary to forward the DOC-3692 to the HIPAA Officer if the record is found. Retain the DOC-3692 in the “Search for Missing Record” folder/binder.

IV. Communicate with HIPAA Compliance Officer

- A. When the facility and statewide search are unsuccessful, immediately send an email notification to the HIPAA Compliance Officer, with the completed DOC-3692 – Health Care Record Search Procedure During Incarceration, or DOC-3692A – Health Care Record Search Procedure Upon Transfer attached.
- B. HIPAA Compliance Officer will provide notification to the inmate patient when required.

V. Create Replacement Medical Chart When Search Is Unsuccessful

- A. Create a replacement volume for the period of the missing records as identified on the DOC-3692 – Health Care Record Search Procedure During Incarceration or DOC-3692A – Health Care Record Search Procedure Upon Transfer under Step 5.
- B. Follow procedures in DAI Policy 500.50.03 to create the Medical Chart volume.
 1. Obtain a “replacement record” sticker from CMR and affix to outside front of the replacement Chart, or create a sticker on-site per instructions obtained from CMR.
 2. If inmate patient has multiple Chart volumes, ensure they are numbered correctly when incorporating the replacement volume into the numbering sequence.
- C. Legal Documents
 1. If the most current volume of a multi-volume Chart is being created, check earlier volumes for legal documents filed on top of the Problem List

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divider. Move currently in effect legal documents, if any, to the replacement volume.

2. If there exists a reason to believe the inmate patient might have a guardian, contact the PSU to see if a DOC-3563 – Notification Regarding Guardianship of the Person is filed in the PSU Record.

D. Immunization Records

1. Obtain immunization information from the WIR website for the missing date range.
2. Upon receipt, file in Database Section of the Chart.

E. State Lab of Hygiene Records

1. Obtain information for the missing date range by calling 1-800-862-1013 or 608-262-6386.
2. Upon receipt, file in the Laboratory Section of the Chart.

F. Laboratory Records

1. Using WICS or Locator, determine the facilities at which inmate was placed during the time period of the missing Chart volume.
2. Search Dynacare database for each facility.
3. Print out the records from those facilities, and file them in proper date order in the Medical Chart, Laboratory Section.
4. If problems arise, contact Dawn Monzel at Dynacare via email at DMonzel@dynacaremilwaukee.com.

G. Psychiatric Reports

1. Check Escribe for Psychiatric Reports in the missing date range. Print and file in proper date order in Medical Chart, Psychiatric Section.
2. If the date range of the missing Psychiatric Reports precedes the dates of records in Escribe, ask PSU to check the PSU Record for reports for those dates.
3. If so, ask the PSU to copy and forward to the HSU those Psychiatric Reports.

H. Filled Prescriptions

1. Contact Central Pharmacy Services for a print-out of prescriptions filled for the missing date range.
2. Upon receipt, file in the Medical Chart, Medications Section.
3. Consult with Supervisor/HIPAA Compliance Officer about the need to ask Central Pharmacy Services to search for copies of the Prescriber's Orders.

I. Vestica Records

1. Contact HIPAA Compliance Officer to request a search of Vestica records for the missing date range.

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2. Upon receipt of Vestica records, if any, HSM shall direct that an HSU employee contact the off-site providers to request reports generated from the off-site visits.
 3. Use the DOC-3335 – Request for Protected Health Information for Ongoing Treatment to request the records.
 4. Upon receipt, file in the Medical Chart, Consultations Section.
- J. Class III Request Records
1. Using WICS or Locator, determine the facilities at which inmate was placed during the time period of the missing Chart volume.
 2. The HSU employee with “super-user” status shall access McKesson records for all sites for the missing time period to search for the Review Summary (Class III) records.
 3. Contact designated Nursing Coordinator if the HSU has no super-user who has access to all sites, so the Coordinator can modify the profile of an employee to permit that access.
 4. File the McKesson (Interqual) Review Summary print-outs in the Medical Chart, Consultations Section in proper date order.
- K. Print out the most recent WICS Medical Classification screen and file in the Medical Chart, Database Section.
- L. Copies of Records in Possession of Inmate
1. Ask inmate patient if he/she has copies of records the HSU may copy and return. This includes health care and legal records such as Power of Attorney for Health Care documents.
 2. File the copies in the proper section of the Medical Chart.
- M. Labels
1. If the only existing Chart volume is being created, obtain and affix Medical Conditions labels to the proper location on the Chart based upon the inmate patient’s medical conditions.
 2. If prior Chart volumes exist, check Chart covers for labels, and place the same labels on the replacement Chart if it is the most current volume.
- VI. Create Replacement Medications Record Envelope When Search Is Unsuccessful**
- A. For an inmate patient with prescribed medications, create a replacement envelope with proper name label.
 - B. Obtain a “replacement record” sticker from CMR and affix to outside front of the replacement envelope, or create a sticker on-site per instructions obtained from CMR.
 - C. Contents of the envelope consist of DOC-3026 – Medication/Treatment Record forms which are not available for copying from another source.

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VII. Create Replacement Psychological Reports – Copies Envelope When Search Is Unsuccessful

- A. Create a replacement envelope with proper name label.
- B. Obtain a “replacement record” sticker from CMR and affix to outside front of the replacement envelope, or create a sticker on-site per instructions obtained from CMR.
- C. Review DAI Policy 500.50.02 – Attachment 1, for the list of documents the PSU forwards to the HSU for filing in the white envelope.
- D. Forward an email request to the PSU to request copies of the documents for the missing date range. Retain the email.
- E. Upon receipt, file PSU documents in the replacement envelope.

VIII. Create Replacement PRF When Search Is Unsuccessful

- A. Create a replacement PRF with the proper name label.
- B. Obtain a “replacement record” sticker from CMR and affix to outside front of the replacement folder, or create a sticker on-site per instructions obtained from CMR.
- C. Ask the inmate patient if he/she has copies of HSRs. If the inmate patient agrees, promptly copy and return the copies to the inmate patient.
- D. File copies in proper date order, most recent on top, in the PRF.
- E. HSUs shall be routinely forwarding the contents of the PRF to scanning vendor for scanning into Electronic Content Management. Therefore, if a PRF cannot be located, only a few months of records should be missing.

IX. Create Replacement for Dental Record When Search Is Unsuccessful

- A. Create a new Dental Record following DAI Policy 500.40.03.
- B. Obtain a “replacement record” sticker from CMR and affix to outside front of the replacement Dental Record, or create a sticker on-site per instructions obtained from CMR.
- C. X-rays: Digital x-rays are stored in a PAC System when taken at DCI/TCI since 2011. If the missing Dental Record includes the time period of 2011 to the present, x-rays may be viewed in the PAC system. Contact the Dental Director about obtaining printed versions of the x-rays.
- D. Classification Screen: Print out the Dental Classification screen in WICS, and file in the Correspondence Section.

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E. Copies of Records in Possession of Inmate Patient: An inmate patient may have in his/her possession copies of DSRs, and other dental documents. If the inmate patient agrees, the DSU shall promptly copy and return the copies to the inmate patient.

X. Create Replacement for PSU Record When Search Is Unsuccessful

- A. Create a new PSU Record: yellow envelope or multi-section record per DAI Policy 500.70.11.
- B. Obtain a “replacement record” sticker from CMR and affix to outside front of the new PSU Record, or create the a sticker on-site per instructions obtained from CMR.
- C. Copies of PSU Records in HSU: Ask the HSU to copy and forward to the PSU documents filed in “Psychological Record – Copies” envelope for the missing date range. If the HSU responds the envelope is missing, or contains only a very few records, ask the Records Office to search the confidential envelope of the Social Services File.
- D. Psychiatric Reports – Access Escribe to obtain Psychiatric Reports for the missing date range.
- E. Psychiatric Reports – Medical Chart: Ask the HSU if the Medical Chart includes Psychiatric Reports for dates preceding the dates of reports available in Escribe, if those reports are in date range of the missing PSU Record.
- F. Electronic Database: If any PSUs maintain an electronic database that contain PSU records for the inmate (such as the DOC-3472 – Mental Health Screening Interview or DOC-3473 – Psychological Services Clinical Contact), ask them to print out those reports for filing in the PSU Record.
- G. Classification Screen: Print-out the WICS Mental Health Classification screen and file in Reports Section of a multi section PSU Record.
- H. Copies of Records in Possession of Inmate: An inmate patient may have copies of PSRs, and other PSU documents. If the patient agrees, the PSU shall promptly copy and return the documents to the inmate patient.

XI. Additional Steps When Search Is Unsuccessful

- A. When the only volume, or the most recent volume, of the Medical Chart Volume is missing:
1. Ask the inmate patient to complete a DOC-3018 – Intake Screening/Medical History.

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2. Upon receipt and filing of the records requested from various sources, a medical provider must review the Chart to ensure identified medical problems are being addressed.
 3. Upon receipt and filing of the records requested from various sources, schedule a physical examination, if there one has not been completed within the past year.
 4. A new TST screening shall be done following normal procedures, when the Chart does not contain TST results within the past year.
- B. When the missing Medical Chart Volume is not the most recent volume of a multi-volume Chart, obtain as many of the documents as possible for the time period covered by the volume, but the DOC-3018 – Intake Screening/Medical History does not need to be redone, nor does a physical examination need to be completed.
- C. When any part of the HCR maintained by the HSU cannot be located, the HSM shall schedule an appointment with the inmate patient to discuss any concerns he/she has about the missing records, and to explain the process being followed to replace as much of the missing record as possible.
- D. Missing PSU Record: A psychologist shall promptly meet with the inmate patient to complete a new DOC-3472 – Mental Health Screening Interview, and to discuss any concerns the inmate patient may have about the missing record.
- E. Missing Dental Record: Dental assistance shall schedule an appointment for an examination and x-rays within 30 days at no charge to the inmate patient. At the appointment the dentist shall discuss any concerns the inmate patient may have about the missing record.

Bureau of Health Services: _____ **Date Signed:** _____
 James Greer, Director

_____ **Date Signed:** _____
 David Burnett, MD, Medical Director

_____ **Date Signed:** _____
 Mary Muse, Nursing Director

Administrator’s Approval: _____ **Date Signed:** _____
 Cathy A. Jess, Administrator

DIVISION OF ADULT INSTITUTIONS FACILITY IMPLEMENTATION PROCEDURES

Facility: Name		
Original Effective Date:	DAI Policy Number: 500.50.22	Page 14 of 14
New Effective Date: 00/00/00	Supersedes Number:	Dated:
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Will Implement <input type="checkbox"/> As written <input type="checkbox"/> With below procedures for facility implementation		
Warden's/Center Superintendent's Approval:		

REFERENCES

DEFINITIONS, ACRONYMS, AND FORMS

FACILITY PROCEDURE

- I.
 - A.
 - B.
 - 1.
 - 2.
 - a.
 - b.
 - c.
 - 3.
 - C.

II.

III.

RESPONSIBILITY

I. Staff

II. Inmate

III. Other