




## Policy and Procedures

<b>DEPARTMENT NAME:</b> Quality Management		
<b>SUBJECT:</b> Electronic Storage of Original Records and Shredding Paper Documents		<b>POLICY NUMBER:</b> QM-044
<b>APPROVAL:</b> 	<b>EFFECTIVE DATE:</b> 12/22/2020	<b>REPLACES :</b> QM-044 dated 4/1/2013

- I     **PURPOSE:** To electronically scan all designated service provider's client documents; designate the electronic documents as original; and set forth the process for destroying the paper (hard copy) documents.
  
- II    **CONTACT:** Quality Management Director
  
- III   **PERSONS AFFECTED:** This policy applies to Children's Network of Southwest Florida (CNSWFL) staff and staff with designated contracted agencies within the geographic areas of the 20<sup>th</sup> Judicial Circuit.
  
- IV    **POLICY:** This policy assures that the Children's Network of Southwest Florida, its contracted Case Management Organizations, and other designated contracted agencies will fully utilize the electronic storage of client records, maintaining consistent standards set forth in statute, rule, and policy.
  
- V     **BACKGROUND / RELATED AUTHORITY:** General Counsel Opinion dated September 9, 2008 regarding storing records electronically; Section 92.29 Florida Statutes; rule 1B-26.003 Florida Administrative Code. Department of Children and Families Operating Procedure CFOP 15-4 as well as all provisions of retention and disposition requirements of public records and media as outlined in Florida Statute Chapters 119 and 257; Florida Administrative Code sections 1B-26.003, 1B-24.001 and 1B.24.003.
  
- VI    **DEFINITIONS:**
  - A. ASK System (Agency Secured Knowledge): Combined hardware/software solution that acts as a virtual file room, storing scanned electronic copies of physical documents that comprise the case record.
  
  - B. Case Management Organization (CMO): An agency in which the Children's Network of Southwest Florida contracts with to provide case management services to families and children.
  
  - C. Hard Copy: The same as the paper document.

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- D. Records Retention Schedule: Length of time a "record copy" must be maintained by the agency before the copy may be destroyed.
- E. Record Copy: Official master record that must be retained for the retention period. There is only one "record copy" and it will always be stored in the ASK System. In accordance with Florida Statute 92.29, the record copy will be received as evidence with a like force and effect as the original document.

**VII. PROCEDURES:**

**A. Record Maintenance:**

1. All client records are maintained in ASK, in the industry standard TIFF file format at 300 dpi.
  - a. The ASK System is a web-based electronic document storage system that can be accessed by authorized users from anywhere.
  - b. The ASK System allows users to quickly search for and retrieve client records.
2. Each center has a scanning station and a trained scanning operator that will be able to scan documents and upload PDF files into ASK.
3. The service provider's staff is neither to create their own cases files nor to have any copies of client documents without prior written authorization by CNSWFL.
4. The Scanning Operator receives the hard copy of the document. They then prepare, scan, and index the documents. Each location is responsible for creating its own in-house protocol for scanning documents.
5. Documents should be available in ASK within forty-eight (48) hours after they have been received by the Scanning Operator.
6. The Scanning Operator scans the submitted documents and links each document to its associated case utilizing validation in Batch Manager. There they will be able to apply to section, date, and title to facilitate quick and accurate retrieval from ASK.
7. Any documents not able to be validated at that moment because of information not available will then be rejected and sent to the Imaging Specialist for correction.
8. Printing of documents in the ASK system is restricted to authorized individuals.

**B. Records Retention Schedule:**

1. CNSWFL retention schedule adheres to the retention and disposition requirements of public records as outline in Florida Statute Chapters 119 and 257, applicable Florida Rules, including but not limited to Chapter 1B-24, and all applicable contracts.
2. The retention schedule is applicable to all records and information created and maintained by the provider and includes all media, e.g., hard copy, electronic data, film, etc., per Chapter 119 Florida Public Records Law.
3. At no time will any information in the case record be removed or expunged, unless legally amended, ordered, or directed to do so. The case file is to be retained in its entirety prior to any conversion based on the appropriate retention schedule.
4. The retention schedules include the following requirements for different documents:
  - a. All Records:

The record copy for all case records is never destroyed. As of July 2012, these records will be kept in electronic format in ASK.
  - b. Original Hard Copy of Client Documents Never to be Destroyed:
    - i. Birth certificates
    - ii. Social security cards
    - iii. Passports
    - iv. Photographs
    - v. Original correspondence /greeting cards/letters
    - vi. Marriage/Death certificates
    - vii. Immunization records
    - viii. Medicaid cards
    - ix. Fingerprint cards
    - x. Anything with a seal
    - xi. Original report cards
    - xii. Original diplomas
    - xiii. Original certificates of completion of any classes completed
    - xiv. Any other personal items, such as mementos or jewelry, etc.
  - c. Each agency should have a designated locked area where these records are stored.
  - d. Once the client case is closed, all original documents, except birth certificates stamped/watermarked for official use only, will be

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provided to the caregiver or the child, if the child has reached the age of majority.

- e. Upon termination of agency involvement, the agency is to retain any birth certificate that is stamped / watermarked for official use only. The document is not to be given to the child / caregiver / birth family or to another agency.

**C. Disposal:**

1. Scanned documents are shredded within 90 days of scanning with the exception of documents that the hard copy must be retained. See Section VII. B. Records Retention Schedule.
2. Once a document is scanned, it is placed in a storage box by calendar day.
  - a. The box is clearly labeled with the date the contents were scanned.
  - b. The box is held for ninety (90) days.
  - c. On the ninety first (91<sup>st</sup>) day, the documents are shredded by the scanning staff.
  - d. The date on the box is removed and the box is reused.
3. When the original document is an electronic file that has been uploaded to the document imaging system, a hard copy of the original will be made and retained for ninety (90) days or the electronic original will be retained in a designated folder on the J:Drive for ninety (90) days. On the ninety first (91<sup>st</sup>) day the hard copy will be destroyed or the electronic document will be permanently deleted from the folder.

**D. Retrieving Records from Archives:**

1. When a client requests a copy of their closed file, it is retrieved by the CMO and delivered to CNSWFL. The Children's Network redacts the file and provides a copy to the client. The original file is then returned to the CMO for scanning.
2. When a file is retrieved from archives due to the case being reopened, the CMO scans the file into ASK, and then notifies the Imaging Specialist. The hard copy of the files is then maintained for ninety (90) days, at which time the documents can be shredded with the exception of documents that the hard copy must be retained. See Section VII. B.4.b.

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**E. Staffing Responsibilities:**

Scanning staff are responsible to

1. Scan/upload the submitted documents into the ASK system and to link each document to its associated client cases;
2. Verify that all documents are properly saved and available in ASK.
3. Maintained scanned originals for ninety (90) days and destroy the originals on the ninety first (91<sup>st</sup>) day.