



POLICY TITLE:	Client Records Management		
 	CHILD AND FAMILY SERVICES AGENCY		
Approved By:	Date Approved:	Original Effective Date:	Last Revision:
Robert L. Matthews - Director	February 10, 2023	February 29, 2009	February 8, 2023

I. AUTHORITY	<p>The Director of the Child and Family Services Agency (“CFSA”) adopts this policy to be consistent with the Agency’s mission, and applicable federal and District of Columbia laws personnel regulations, applicable collective bargaining agreements, and DC Official Code §§ 2-1701 et seq., 4-1302.03, and 16-311, 22-A DCMR 6322, District of Columbia Public Records Management Act of 1985 (DC Law 6-19), the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and associated regulations promulgated by 45 CFR Parts 160, 162 and 164), and Health Information Technology for Economic and Clinical Health (HITECH) Act.</p>
II. APPLICABILITY	<p>This policy applies to all CFSA employees, including contracted employees and volunteers who may be responsible for filing or handling CFSA case records.</p>
III. RATIONALE	<p>CFSA maintains active and closed case and investigative records, all of which fall under the CFSA’s policy on confidentiality. Proper management of case and investigative records is essential to support effective practice, reporting, and compliance.</p> <p>CFSA records must be securely stored in accordance with local and federal laws and regulations. Accordingly, CFSA has established policy to ensure compliance with the law as well as the development of secure, efficient, and effective management of all CFSA case records.</p>
IV. POLICY	<p>Any record created or received by the District of Columbia during official business is the property of the District of Columbia. Workforce members shall not destroy, transfer, or dispose of any client case record information (photocopies or original documents), or CFSA client files without consulting CFSA’s Records Management Unit (“RMU”).</p> <p>This policy is set forth to ensure compliance with District of Columbia law in addition to ensuring the efficient management, security, and confidentiality of all CFSA client records. Records shall be accessible to authorized entities and staff to support CFSA’s practice, regulatory compliance, and litigation requirements. While the RMU is responsible for the general oversight and maintenance of all active and closed CFSA case records, regardless of location, each provider, program area or unit shall store and secure the active and closed case records within their respective programs.</p> <p>In collaboration with CFSA program administrators, RMU shall ensure that client information is securely stored and protected. For purposes of this policy, “secured storage” is defined as a specifically designated office area with locked file cabinets or areas with restricted entry that prohibit intrusion by unauthorized personnel.</p>

V. CONTENTS	A. General Practice B. Closed Records C. Transferring Records D. Requesting Access to Records
VI. GUIDELINES	<p>Section A: General Practice</p> <p>CFSA employees shall refer to the online Client Records Management (CRM) Business Process for detailed procedures associated with the policy guidelines under this section.</p> <ol style="list-style-type: none"> 1. CFSA client records (including all documents and related volumes) shall remain the exclusive property of CFSA, regardless of where they are located and maintained. 2. The organization of records shall include all required documents, appropriately filed and formatted in a manner established by Agency standards (see <i>CRM Business Process Attachment A</i>). 3. CFSA client records and documents shall be stored, maintained, archived, and disposed of based upon the DC Government record retention schedule developed by CFSA and approved by the DC Office of Public Records (“OPR”). CFSA’s records retention schedule ensures that required records are properly maintained and disposed of in an organized and thorough manner (see <i>CRM Business Process Attachment B</i>). 4. Medical records created, updated, and compiled within the Health Services Administration remain independent of the child or family case file and are subject to the same retention and archival standards as outlined in the records retention schedule. 5. For case records involving a child who is adopted, all documentation and information pertaining to the adopted child or adoptive parents shall be removed from the biological family’s case record. 6. Persons responsible for producing hard copies of client information shall remove copies from copiers, printers, and fax machines (see the CFSA Confidentiality policy). <ol style="list-style-type: none"> a. CFSA records containing protected health information (“PHI”) shall be stored in a secure location to prevent access by unauthorized individuals. b. There are civil and criminal sanctions imposed for the negligent or intentional breach of PHI confidentiality (which includes medical, dental, and mental health information). 7. In the event of a lost case record, the assigned social worker or employee who was formerly in possession of the record shall immediately contact their supervisor, program manager and the RMU to report the loss (see <i>Procedure G of the Business Process</i>).

	<p>8. If actual, impending, or threatened unlawful destruction, defacement, or alteration of CFSA records is brought to the attention of any staff member, they shall immediately notify their supervisor, or program manager, or administrator, who shall notify the CFSA privacy officer, RMU, and the director of the Agency.</p> <p>9. No case records should be removed from the premises except under the circumstances listed in the CRM Business Process (see <i>Procedure A, General Practice 4c</i>).</p> <p>10. CFSA contracted private agencies shall maintain a hard copy of client records in the original CFSA standard six-section classification folder.</p>
	<p>Section B: Closed Records</p> <p>1. The Records Management Policy shall provide guidance regarding creation, preservation, security of closed records retained for legal, operational, historical reasons, and disposal of those records or files once they have reached the end of their retention period.</p> <p>2. CFSA client records shall be forwarded to RMU for closure processing within 30 business days of closure in court or the end date of client services.</p>
	<p>Section C: Transferring Records</p> <p>1. Any transfer of an active or closed record from one entity or individual to another shall be processed through RMU, including the following types of transfers:</p> <ul style="list-style-type: none"> a. From and within CFSA programs b. Between CFSA programs and private agencies c. Archival transfers to and from the OPR <p>Note: <i>The RMU is the only CFSA entity authorized to transfer records to the OPR for archiving.</i></p> <p>2. Workforce members shall arrange transferred records and relevant documents according to guidelines established in the (see Procedure B and C of the CRM Business Process).</p> <p>3. If a private agency decides to convert CFSA client records to a new format, that agency, at its own expense, shall convert the records back to the original CFSA standard six-section classification folder prior to transfer to a new agency or submission for case closure.</p> <p>4. The Contract Monitoring Division shall notify the RMU of the closing of a private agency two weeks before the agency's final closing date (see <i>Procedure J of the of the CRM Business Process</i>).</p>

Section D: Requesting Access to Records

Access to hard copy active or closed case records, electronic records stored either in CFSA Child Welfare Information System or archived at the OPR is restricted to persons who:

1. Are authorized to access client records by law.
2. Are approved or assigned CFSA personnel.
3. Have a court order from the Superior Court of the District of Columbia authorizing access to the record.

Note: *To access information in final adoption records, the requestor shall have a court order from the Family Court to gain access to Break Seal records.*

4. The RMU shall forward all external requests to access client information to CFSA's Office of the General Counsel.