Guidelines for Electronic Maintenance of Files

The Guidelines below are preliminary parameters that Residential Child Care (RCC) would require in order for a facility/agency to maintain part or all of their files electronically that are subject to regulatory review. Prior to transitioning any documents subject to RCC review to an electronic format, a facility/agency needs to submit to RCC their policies and procedures related to the maintenance of electronic files and receive approval.

Below are specific highlights that need to be addressed in the policies and procedures in order for them to be approved:

- Policies must specify which documents will be maintained electronically versus external paper documents when only portions of the files are being kept electronically. Additionally, the hard copy files must contain a cover sheet that details the documents that are located within the file.
- Policies will address how the electronic files will be made accessible to all applicable caregivers during their work shift and emergency evacuations.
- Policies will require that all electronic records be available during operating hours for review by licensing upon request.
- Policies will require that three (3) operable laptops/computers with access to all electronic documents along with printing capabilities be accessible to licensing representatives during their site visits.
- Policies shall require a staff member familiar with the computer program to be available to orientate the surveyor to the electronic format system, using an existing tutorial/orientation program or handout, and to answer questions and provide technical assistance during the duration of the site visit.
- Policies will require that all electronic documents be stored in a PDF format or some other permanent storage to prevent alteration of the document. If this is not possible, policies will require that the system used by the facility will automatically time stamp all edits to the documents. This can be saved in a cloud or archived.   Case Management systems can be used as long as those systems track changes made to the various fields.
- Policies will require that any previously existing paper documents converted to an electronic format shall be available in its original paper format for one licensing cycle. After that licensing cycle has elapsed, the original paper format shall be discarded according to the agency's document retention policies.
- Policies shall require that there be a separate and distinct electronic file for each resident and staff member. Within each resident and personnel file, there will be clearly labeled folders that are organized in a way that promotes easy navigation for the surveyor to find medical info, service plans, etc.
- Policies shall include the method that will be used to obtain signatures on documents that are required by the rules and regulations, including whether the use of electronic signatures will be accepted and if so, the procedures for such use.
- Policies will require that the electronic database be reasonably secure, includes anti-virus software, is available by password, is in accordance with HIPPA guidelines, and is kept confidential and inaccessible to unauthorized persons.
- Policies will provide for a data recovery plan that includes a system for backing up data either locally or remotely. The back-up media shall be stored at both on-site and off-site locations or alternatively at multiple offsite locations. It must also have the capability of timely (with minimal disruption in the delivery of care and services to the children) restoring the data to the facility or to the central server in the event of a system failure. A full back-up shall be performed at least weekly, with incremental or differential backups daily.