

## NORTHCARE NETWORK

<b>POLICY TITLE:</b> Sequestering a Record	<b>CATEGORY:</b> Information Management	
<b>EFFECTIVE DATE:</b> 9/12/17	<b>BOARD APPROVAL DATE:</b> 10/11/17	
<b>REVIEW DATE:</b> 3/31/25	<b>REVISION(S) TO POLICY STATEMENT:</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>OTHER REVISION(S):</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>RESPONSIBLE PARTY:</b> Chief Information Officer	<b>CEO APPROVAL DATE:</b> 4/3/25 Megan Rooney, CEO	

### **APPLIES TO**

NorthCare Network Personnel  
Member CMHSPs

### **POLICY**

It is the policy of NorthCare Network that a consumer record should be sequestered to protect from spoilage, alteration and destruction during certain situations including but not limited to unexpected death and/or litigation. Sequestration functionality can also be used to block specific users or allow only a specific list of users to access a consumer chart in cases where a conflict of interest or privacy concerns have been determined to require such an intervention by CMHSP or PIHP staff. The CEO or designee approval is required to sequester a record, limit access to a record using sequestration functionality, or release a record from sequestration.

### **PURPOSE**

To ensure that consumer medical records are protected from spoilage, alteration and destruction during potential litigation and in cases of an unexpected death, and that access to a consumer chart can be further controlled in cases where a conflict of interest or privacy concerns have been determined to require such an intervention by CMHSP or PIHP staff.

### **DEFINITIONS**

N/A

### **REFERENCES**

ELMER Sequester a Record Procedure

### **HISTORY**

NEW POLICY: 9/12/17

REVIEW DATE: 7/23/18, 5/29/19, 3/29/20, 1/18/21, 4/8/21, 2/21/22, 12/16/22, 5/24/24, 3/31/25

REVISION DATE: 4/8/21, 5/24/24

CEO APPROVAL DATE: 9/12/17, 8/14/18, 6/4/19, 4/6/20, 2/2/21, 4/8/21, 3/1/22, 1/10/23, 6/11/24, 4/3/25

BOARD APPROVAL DATE: 10/11/17

## **PROCEDURES**

1. Electronic Records – see ELMER Sequester a Record SOP
2. Paper (hybrid record) – Some historical records are stored in paper or on microfiche or other electronic methods. Each CMHSP has either ELMER as their master patient index or a consumer log for historical cases not in ELMER. For all consumers that have a MCOID in the EHR (ELMER), the source of knowledge for sequestering a record will be controlled in the ELMER system. Staff must reference ELMER for this setting prior to handling the paper record to assure no spoilage, alteration or destruction occurs while the case is sequestered. If the record exists only in paper form, the paper chart must be retrieved and secured in a locked cabinet per CMH policy. The CEO or designee must approve the release of the sequester. Each CMHSP is to follow their internal procedure on controlling the paper or hybrid record.