

Action Item A-2

Revision of Policy 27 – Health Information Management

Background:

CBH staff have reviewed the CBH Health Information Management Policy (Policy #27) and are pleased to recommend revisions to the Board of Directors for review.

A primary theme of the recommended changes is the movement of several portions of the Policy to the level of procedure. These changes are made without compromising the intent or integrity of the Policy itself.

This policy and accompanying revisions have been reviewed and endorsed by Pat McDermott.

Summary of Changes:

Current Health Information Management Policy	Proposed Changes to Policy
Contains procedural references	Remove procedural items leaving the policy statement
Regulatory references listed	Mr. McDermott recommended and CBH adopted the legal references listed in updated policy.
There are no other changes.	

Motion from the CBH Executive Committee:

That the Board approve the revisions to Health Information Management policy as presented.

COLONIAL BEHAVIORAL HEALTH

COUNSEL REVIEW OF BOARD POLICY

Name of Policy: Health Information Management

Category: Administration and Operations

Policy No.: 27

Review Date: 12/29/2025

Name of Counsel: Patrick B. McDermott, Esq.

Comments of Counsel:

1. Virginia Code Compliance: Make the following changes:

- a. Delete: 12VAC105-880
- b. Delete: 12 VAC105-910
- c. Delete: 12 VAC105-920
- d. Delete 12VAC122-120
- e. Delete 12VAC120-930
- f. Delete 12VAC120(b)(c)
- g. ADD 12VAC105-910 Records Retention
- h. ADD 12VAC115-80 Confidentiality

2. Federal Law Compliance: No Change

3. Grammar and Punctuation: Title contains misspelling of “Information.”

4. Comments: Major repeals and additions to Virginia Administrative Code.

Patrick B. McDermott, Esq.

Signature of Counsel

Policy

Category: Organization
Title: Health Health Information Management
Policy Number: 27
Primary Areas Affected: Clinical Staff and Support Staff

Policy Statement.....	2
Source of Authorization	2
Legal/Regulatory References	3
Definitions	3
Diary of Changes	5
Date of Origin	5
Dates of Review	5
Dates of Revision	5
Approved By	5

Policy

Category:	Organization
Title: Health	Health Information Management
Policy Number:	27
Primary Areas Affected:	Clinical Staff and Support Staff

Policy Statement

It is the policy of Colonial Behavioral Health (CBH) to ensure that all health record documentation is accurate, complete, and maintained in compliance with applicable state and federal regulations, professional standards, and CBH policies and procedures. All documentation shall support the integrity of the health record and provide clear evidence of the assessment, treatment, monitoring, and evaluation of each individual's condition and progress. Information and documents created or scanned by authorized CBH personnel on behalf of the agency constitute the legal health record. Staff may utilize collaborative documentation practices in which the provider and the individual receiving services work together to complete assessments, progress notes, and service plans. Staff may use CBH approved abbreviations when documenting in the health record.

The electronic signature shall be the deemed signature of the author and suffice as the written signature of the employee or individual making the entry in the health record. The electronic signature will be treated as a written signature with all the same ethical and legal consideration.

This policy applies to documentation and forms used across CBH programs and is implemented in conjunction with applicable program plans and related agency policies and procedures that outline specific documentation requirements, standards of practices and compliance expectations for each program providing services to individuals.

This policy applies to all CBH staff, contractors, interns, and volunteers who create, maintain, or access client health information in any form. It governs all documentation and forms used across CBH programs, including electronic health records (EHR), paper charts, and other authorized data systems.

Source of Authorization

 Board of Directors

Policy

Category: Organization
Title: Health Health Information Management
Policy Number: 27
Primary Areas Affected: Clinical Staff and Support Staff

Legal/Regulatory References

CARF - Section 2.G: Records of Persons Served
DBHDS - 12VAC35-105-870: Records Management
DBHDS – 12VAC35-105-890: Individual Records
DBHDS – 12VAC105-910 Records Retention
DBHDS – 12VAC115-80 Confidentiality
Library of Virginia – GS-18 Community Services Boards: Retention and Disposition Schedule

Definitions

1. Abbreviations - Standardized shortened forms of medical words, phrases, diagnoses, procedures, or measurements used in clinical documentation for record keeping.
2. Electronic Signature is a unique personal password, personal identification number or biometric scans that identify authorized personnel to gain access and sign health record documents in an electronic health record. The electronic signature attests and authenticates health information documents in the electronic health record.
3. Electronic Health Record (EHR) – A digital version of an individual's medical and health information that is created, stored, and maintained within a secure electronic system as well as paper documents that are scanned into the record. The EHR includes demographic information, medical history, diagnoses, medications, treatment plans, progress notes, test results, correspondence, evaluations, releases of information/authorizations and other relevant clinical documentation. It is designed to support the delivery, coordination, and continuity of care by allowing authorized providers to access and update health information electronically.

Policy

Category: Organization

Title: Health Health Information Management

Policy Number: 27

Primary Areas Affected: Clinical Staff and Support Staff

4. Protected Health Information (PHI) – Health information (including demographic data) relating to an individual, which identifies the individual or for which there is a reasonable basis to believe it can be used to identify the individual, and which is transmitted or maintained in any form or medium.
5. Records Management – The set of organizational policies and procedures covering the creation, receipt, maintenance, use, and final disposition of records (both active and closed).

Policy

Category: Organization
Title: Health Health Information Management
Policy Number: 27
Primary Areas Affected: Clinical Staff and Support Staff

Diary of Changes

Date of Origin

10/01/1998

Dates of Review

12/10/2025	11/16/2020 – COVID	12/09/2015	02/14/2011
07/12/2023	19 Protocol	07/22/2014	
07/22/2022	04/08/2019	02/25/2013	
09/16/2021	10/03/2017	10/01/2010	

Dates of Revision

12/10/2025	04/08/2019	02/25/2013	10/30/2009
07/12/2023	10/03/2017	02/14/2011	08/17/2006
07/22/2022	12/09/2015	10/01/2010	06/19/2003

Approved By

Signature

Effective Date

Ryan Ashe

CBH Board Chair

Printed Name

Title