

**UNIVERSITY OF WISCONSIN SYSTEM
UNIVERSITY HEALTH SERVICES
GENERAL RECORDS SCHEDULE**

**APRIL 2009
Amended January
2010, 2014**



UNIVERSITY OF WISCONSIN SYSTEM: GENERAL RECORDS SCHEDULES FOR UNIVERSITY HEALTH SERVICES

I. INTRODUCTION AND PURPOSE

The University of Wisconsin System comprises fifteen distinct institutions, many of which create and receive records that are similar in purpose and utility. In the interest of efficiency, therefore, this records schedule identifies categories of records resulting from processes commonly associated with health services. The identified processes are common to all University of Wisconsin institutions.

This document also provides guidance to University System employees regarding what does and does not comprise a public record, which will in turn allow University employees to retain for a discrete time period and thereafter destroy expired public records, as well as those materials that do not comprise public records. The UW-System must manage all records within University Student Health Services to ensure systematic control from creation or receipt through processing, distribution, maintenance, retrieval, retention and final disposal.

University Health Services provides students with quality medical healthcare, counseling and preventative services. University Health Services are covered under Wisconsin State Statute 146.81 which defines Patient Health Care Records and Health Care Provider, Wisconsin State Statute 146.82 on Confidentiality of Patient Health Records and Wisconsin State Statute 51.30 which covers Mental Health and Treatment Records. HIPAA and FERPA privacy rules apply to these records.

II. SCOPE: The records schedules described within this document include the following records:

A. STUDENT HEALTH CENTER

- DIRECTORS CORRESPONDENCE - (HRS100)
- ADMINISTRATIVE SUBJECT FILES - (HRS101)
- ANNUAL REPORTS – (HRS102)
- MEETING RECORDS – (HRS103)
- HEALTH INSURANCE RECORDS – (HRS104)
- HEALTH ADVISORY COMMITTEE RECORDS – (HRS105)
- MEDICAL RECORDS – (HRS106)
- EMPLOYEE/VISITOR ENCOUNTER – (HRS107)
- INSTRUCTIONAL CAMP HEALTH RECORDS (NON-ATHLETIC) – (HRS108)
- STUDENT HEALTH CENTER DAILY LOG – (HRS109)
- APPOINTMENT SCHEDULES AND STATISTICAL LOGS – (HRS110)
- VISIT AND CODING STATISTICS – (HRS111)
- HEALTH HISTORY FORM-INACTIVE – (HRS112)
- PHARMACY RECORDS – (HRS113)
- LABORATORY REPORTS – (HRS114)

General Records Schedule: Student Health Services

- MASTER PATIENT INDEX (MPI) – (HRS115)
- STD CASE RECORDS – (HRS116)
- QUALITY CONTROL RECORDS – (HRS117)
- HEALTH SERVICE PROGRAMS – (HRS118)

B. COUNSELING CENTER

- AMINISTRATIVE SUBJECT FILES– (HRS119)
- ANNUAL REPORTS – (HRS120)
- MEETING RECORDS – (HRS121)
- STUDENT COUNSELING PATIENT FILES – (HRS122)
- EMPLOYEE ASSISTANCE PROGRAM (EAP) – (HRS123)
- APPOINTMENT SCHEDULE AND STATISTCAL LOGS – (HRS124)
- SATISFACTION SURVEYS – (HRS125)
- COMMUNITY OUTREACH PREVENTION & EDUCATION – (HRS126)

C. STUDENT ATHLETICS

- STUDENT ATHLETE MEDICAL FILES – (HRS127)
- STUDENT ATHLETE DIAGNOSTIC FILES – (HRS128)
- SPORTS CAMP MEDICAL RECORDS – (HRS129)

III. UTILITY AND FUNCTION OF INFORMATION PROVIDED WITHIN THIS DOCUMENT.

- a. Preservation of Historical Documents.** Historically, University records have been preserved in paper files. Presently, however, advances in technology are beginning to present a viable alternative to paper records: electronic data stored in computer systems. Using electronic data to store University records presents a potentially fatal flaw, however, because electronic data decays over time. Thus, unlike paper records, with the passage of time electronic records lose information as it randomly slips away in byte-sized chunks, unless software updates are consistently purchased, installed, and maintained.

Because of this aspect of information technology systems, records storage within an information system must comply with the legal requirements set forth in Regent Policy Document 3-2: University of Wisconsin System Public Records Management; and Chapter Administrative 12: Electronic Records Management- Standards and Requirements. Please carefully review these documents prior to storing official copies of public records upon information systems and if you have questions or concerns, then please seek assistance from the records officer at their respective University of Wisconsin institution.

b. Use of the Systems Approach. To as great extent as possible, the records schedules included within this document were developed using a systems approach. That is, the substantive information contained within an individual document, rather than the document's format, is the basis for the descriptor of each department. This is because the format for some documents is dynamic in nature and subject to administrative change. Thus, the descriptors for each document are as comprehensive as possible without relying upon format or form names.

Due to these changes, however, there may be instances in which an individual records schedule does not reflect the exact title or name of a form as used by the originator of a document. In such cases, if a University employee has difficulty determining whether a document comprises a record by reviewing the descriptive information contained within both the document and a records schedule, then employees seek assistance from the records officer at their respective University of Wisconsin institution.

c. Minimum Retention Established and Permanent Retention Procedure. The records schedules included within this document establish minimum retention periods for each type of record. The disposition of each record is assumed to be destruction after its minimum retention period. However, expired records may be retained, for as long as they are needed as a resource for performing future projects on behalf of the University of Wisconsin.

d. Materials That Do Not Comprise Public Records. Under Wisconsin law, many materials do not comprise public records. Therefore, non-records should be retained only so long as they are useful as a resource for performing the transaction of public business on behalf of the University of Wisconsin System. Thereafter, in the interest of efficiency and proper resource management, they must be destroyed.

The following materials are not public records, under Wis. Stats. §§ 16.61 and 19.35.

1. Duplicates. Public records do not include duplicate copies of records, the original copies of which are in the custody of an office contained within the University of Wisconsin System Administration, and which are maintained by a University employee only for convenience or reference and for no substantive purpose.

2. Unsolicited Notices or Invitations. Public records do not include unsolicited notices or invitations received by a University employee, which are not related to any official action taken, proposed, or **considered** by the University of Wisconsin System.

3. Drafts, Notes and Preliminary Computations. Public records do not include drafts, notes, preliminary computations, and like materials, but only if they are intended for personal use by a University employee or prepared by a University employee in the name of the person for whom the employee is working.

4. Routing Slips and Envelopes. Public records do not include Routing slips and envelopes.

5. Personal Materials. Public records do not include materials that are the personal property of a University employee and that have no relation to his or her office.

Please note that non-records should be destroyed as soon as possible, concurrent with the time at which they are no longer useful as a resource for performing the transaction of public business on behalf of the University. Moreover, personal materials should neither be created nor retained by a University during the regular course of business.

Also note that if non-records are retained beyond the time they are no longer useful as a resource for performing the public business on behalf of the University, then under Wisconsin law, duplicates, unsolicited notices, invitations, routing slips and envelopes would have to be turned over to a requester in response to a relevant public records request, and in response to audit or litigation proceedings. See Wisconsin Statute 13.94, 19.35, and 804.01.

CONDITIONS AFFECTING FINAL DISPOSITION,

All recommended dispositions stated within this schedule may be carried out by University of Wisconsin institutions without further consultation or approval from the University of Wisconsin Archives, legal services, or internal audit with the following exceptions:

a. Public Records Request. If a public records request is received by an office for any record or records included within this schedule, then the record (s) cannot be destroyed until the request is granted, or until at least sixty days after the date the request is denied. Court orders may extend this time period. If necessary and upon request, the Office of General Counsel will provide guidance to University of Wisconsin institutions regarding public record requests.

B. Litigation or Audit. Each University of Wisconsin institution must not only retain records that are subject of pending litigation or audit, but also suspend any disposition of those records until such time as the litigation or audit is completed. Requests for records relating to open audit must be filled with the University of Wisconsin institution involved in the audit.

**UNIVERSITY OF WISCONSIN SYSTEM HEALTH SERVICES
GENERAL RECORDS SCHEDULE**

The University of Wisconsin System Health Services General Records Schedule applies to all University of Wisconsin institutions. In order to facilitate efficient records management for University employees, this general schedule is provided in narrative format.

A. STUDENT HEALTH CENTER

UWSH100

Student Health Center Directors Correspondence

The record series includes all general correspondence of the Student Health Center Director. This may include statistical summaries, physician contracts and matters other than individual student health issues.

Retention Time Period

Original: Creation + 3 years, then destroy if not transferring to Archives.
(Some institution's archives may consider the Director's general correspondence to have archival value. Each institution will need to make this determination.)

UWSH101

Student Health Center Administrative Subject Files

The series includes alphabetic topical files, operational policies and procedures and other issues that arise regarding the administration of the Student Health Center.

Retention Time Period

Original: Creation + 5 years then destroy if not transferring to Archives.
(Some institutions may consider administrative files to have archival value. Each institution will need to make this determination.)

UWSH102

Student Health Center Annual Reports

The annual reports document all activities of the Student Health Center on a yearly basis. The report provides financial and statistical information, summaries, accomplishments and discussion of future goals.

Retention Time Period

Original: Creation + 1 year and transfer to University Archives.

Copies: Destroy when no longer needed.

UWSH103

Student Health Center Meeting Records

The record series includes meeting minutes, agendas and distribution materials of all committee and sub-committees created to assist in the management of the Student Health Center.

Retention Time Period

Original: Fiscal year + 3 years then destroy.
(Some institutions archives may consider the meeting records to have archival value. Each institution will need to make this determination.)

Copies: Destroy when no longer needed.

UWSH104

Student Health Services Health Insurance Records

These records include information on the health insurance plan products for students and the different type of information regarding coverage. Also included are enrollment options, types of waivers, payment options, COBRA coverage and foreign government billing and vendor accounting related to insurance plans.

Retention Time Period

Original: Creation + 5 years and then destroy confidentially.

Copies: Destroy when no longer needed.

UWSH105

Student Health Services Health Advisory Committee Records

The record series includes meeting minutes, agendas and distribution materials related to the work of the advisory committee which serves as a liaison with the Student Health Center as well as an advocate for health outreach programs to the campus community.

Retention Time Period

Original: Fiscal year + 3 years then destroy.

Copies: Destroy when no longer needed.
(Some institutions archives may consider the meeting records to have archival value. Each institution will need to make this determination.)

UWSH106

Student Health Center Medical Records

The student medical files contain comprehensive information on each student who receives medical services at the Student Health Center. It may include, but is not limited to Problem Lists, Face Sheets, visit notes, encounter notes, telephone notes, lab tests, radiology tests, mental health tests, other diagnostic tests, physical exams, outside records, correspondence such as emails, messages, allergy injection records, immunization records, consent forms, WIR immunization reports, laboratory reports, T-B Skin Tests, progress notes, flow sheets, psychological reports, Billing records, notices of privacy practices and disclosures. Student Health records are kept according to FERPA confidentiality requirements. These records are considered to be part of the designated set of health records and part of the legal health record guidelines which are center specific.

Retention Time Period

Original: Last semester of attendance + 10 years and then destroy confidentially. Amendment for retention approved 3/2014 See last page.

UWSH107

Student Health Services Employee/Visitor Encounter record

This series contains medical information on each visitor who was treated for emergency or occasional treatment at the Student Health Center.

Retention Time Period

Original: Date of last encounter + 3 years and then destroy confidentially.

UWSH108

Student Instructional Camp Health Records (Non-Athletic)

The records consist of health records and consent forms generated by the Student Health Center for all individuals attending UW System sponsored camps. These records may include individual and family histories, health questionnaires, physical examination results, and X-ray and laboratory reports as well as signed consent forms to allow for medical treatment and medicinal dispensing. **This series does not apply to sports camps record series HRS129**

Retention Time Period

Original: Last year of enrollment + 4 years unless participant is a minor, then records need to be kept until minor reaches age 18. Destroy confidentially.

UWSH109

Student Health Center Daily Log

The daily log includes the name of each patient, the name of the medical personnel attending the patient and the medical problem or treatment it may include procedures done in the laboratory which contain the patient's name, the name of the medical personnel, who attended the patient, and the prescribed treatment.

Retention Time Period

Original: Creation + 3 years and then destroy confidentially.

UWSH110

Student Health Center Appointment Schedules and Statistical Logs

The series includes a weekly schedule for each nurse and physician and the name of the patient seen. It also includes a log for laboratory tests and results, log of physician's appointments, which also includes the patient's name, diagnosis, laboratory work and treatment.

Retention Time Period

Original: Creation + 5 years and then destroy confidentially.

UWSH111

Student Health Center Visit and Coding Statistics

The records series includes appointments, schedules, physician information, coding, invoices, billings, patient accounts, reporting and payment posting.

Retention Time Period

Original: Creation + 7 years and then destroy confidentially.

UWSH112

Student Health History Form – Inactive Students

The record series contains health history forms completed by every student at the start of their enrollment. This series includes only those forms of students who never made an appointment at the Student Health Center. (The forms of students who have been seen as a patient at the Student Health Center are included in the Students Medical file covered under HRS106)

Retention Time Period

Original: Last semester of attendance + 5 years and then destroy confidentially.

UWSH113

Student Health Center Pharmacy Records

This series contains patient prescriptions for pharmaceuticals written by the medical staff of the Student Health Center for patients. The records include the type of medication, the dose and quantity of the medication, when the medication was dispensed and the name of the medical staff person who dispensed it.

Retention Time Period

Original: Date of last visit + 7 years and then destroy confidentially.

UWSH114

Student Health Center Laboratory Reports - Copies

This series includes copies of laboratory reports which include testing and their results completed on each patient at the Student Health Center. (Original Laboratory Reports are kept as part of the Students Medical Record – HRS106)

Retention Time Period

Copy: Creation + 3 years, destroy confidentially

UWSH115

Student Health Center Master Patient Index (MPI)

The record series contains a record of all patients who received care at the Student Health Center and contains the Patient's Medical Record Number, Patient's Legal Name, DOB, Gender, Race, Ethnicity, Address, Campus ID, Account #, Admission or Encounter date, Discharge or Departure date, Encounter or Service Type, Patient's disposition. Master Patient Index is the link in tracking patient, person, or member activity within an organization (or enterprise) and across patient care settings. The MPI identifies all patients who have been treated in a Facility or enterprise and lists the medical record or identification number associated with the name. An index can be maintained manually or as part of a computerized system

Retention Time Period

Original: Keep 75 years or Life of University Health Service, whichever is longer.

UWSH116

Student Health Center STD Case Records

The records series includes all materials which document a positive case of sexually transmitted disease (STD) on campus. The records may include test requisitions, test analytics reports, quality control analytics and other documentation required to verify the report.

Retention Time Period

Original: Send to the Wisconsin Department of Health and Family Services

Copies: Date of test + 3 years and then destroy confidentially

UWSH117

Student Health Center Quality Controls Records

Record series contains Student Health Center studies which are utilized to improve the quality of health care. They include, but are not limited to, quality studies, peer review and case review, risk management reports, satisfaction surveys and National College Health Assessments. It also includes a complaint form or surveys to be completed on optional bases by any patient. The form includes the date, nature of the complaint and a comment section. The staff person's name and the patients name are optional.

Retention Time Period

Original: Creation + 3 years then destroy confidentially.

UWSH118

Student Health Centers Service Program Records

The records series contains materials on various educational programs, reports and correspondence provided by the Student Health Center. This may include posters, circulars, contests and other preventive health care initiatives.

Retention Time Period

Original: Creation + 3 years and then destroy if not transferring to Archives.
(Program material, however, on significant public health issues should be offered to University Archives. If questions arise the Student Health Directors should consult with their University Archivists, regarding what constitutes a significant public health issue.)

Copies: Destroy when no longer needed.

B. COUNSELING CENTER

UWSH119

Counseling Center Administrative Subject Files

The record series includes all correspondence, alphabetic topical files, policies and procedures that deal with the administration of the Counseling Center created by the Director.

Retention Time Period

Original: Creation + 5 years then destroy if not transferring to Archives.
(Some institutions may consider administrative files to have archival value. Each institution will need to make this determination.)

UWSH120

Counseling Center Annual Reports

The Director prepares an annual report which documents all activity of the Counseling Center on a yearly basis. The report includes statistical information.

Retention Time Period

Original: Creation + 1 academic year and transfer to University Archives.
Copies: Destroy when no longer needed.

UWSH121

Counseling Center Meeting Records

The records series includes meeting minutes, agendas and distribution of materials of all committees and sub-committees created to assist in the management of the Counseling Center.

Retention Time Period

Original: Fiscal year of meeting + 3 years than destroy.
(Some institutions archives may consider the meeting records to have archival value. Each institution will need to make this determination.)
Copies: Destroy when no longer needed.

UWSH122

Counseling Center Student Counseling Patient Files

This record series represents the main student health care record for the counseling center. Records include counselor's notes and reports, psychological test results, referral records, correspondence with referring agencies, release forms, security reports and additional information gathered about the client in the course of counseling. The files are used for crisis intervention, monitoring progress and as a resume for future treatment by other professionals. Student Health records are kept according to FERPA and HIPAA confidentiality requirements. These records are considered to be part of the designated set of health records and part of the legal health record guidelines which are center specific.

Retention Time Period

Original: Last semester of attendance + 10 years and then destroy confidentially.

UWSH123

Counseling Center Employee Assistance Program (EAP)

The record series represents the main employee health record for the counseling center. Employee assistance files contain comprehensive information on each university employee who receives counseling services through the EAP. It includes the counselor's notes and reports, referral records, correspondence with referring agencies, release forms, security reports and additional information gathered about the client in the course of counseling. The files are used for crisis intervention, monitoring progress and as a resume for future treatment by other professionals.

Retention Time Period

Original: Last appointment date + 7 years and then destroy confidentially.

UWSH124

Counseling Center Appointment Schedule and Statistical Logs

The record series includes weekly appointment sheets for each counselor with the name of the client, date and time. The statistical logs are compilations of the weekly appointment sheet used for end-of-the month reports.

Retention Time Period

Original: Creation + 2 years then destroy confidentially.

UWSH125

Counseling Center Satisfaction Surveys

Surveys record client satisfaction with Counseling Center services, counselors and admission procedures.

Retention Time Period

Original: Creation + 3 years then destroy confidentially.

UWSH126

Counseling Center Community Outreach Prevention and Education Program

Record series includes materials on community outreach prevention and education programs. This includes but is not limited to posters, circulars, contest materials as well as program related reports.

Retention Time Period

Original: Creation + 3 years then destroy.
(Program material, however, on significant public health issues should be offered to the University Archives.)

Copies: Destroy when no longer needed

C. STUDENT ATHLETICS

UWSH127

Student Athletics Student Athlete Medical Files

Series represents the main student athlete health record for athletics programs. Student athlete medical files contain health physicals, health history questionnaires, physician notes, injury evaluations, injury rehabilitation, diagnostic imaging results, operative reports, operative pictures, health insurance information and any other health material.

Retention Time Period

Original: Last semester of attendance + 7 years and then destroy confidentially.

UWSH128

Student Athletics Athlete Diagnostic Tests

The record series includes MRI's, X-Rays, Bone scans and CT scans. The tests are filed alphabetically by team sport for active student athletes and alphabetical only for non-current student athletes.

Retention Time Period

Original: Last semester of eligibility + 7 years and then destroy confidentially.

UWSH129

Sports Camp Medical Records

Medical records consist of a health history form which is required for each person enrolled in a athletic sports camp sponsored by a UW System institution. The form includes date of last physical examination, immunization records, allergic reactions and identification of any existing medical problems, as well as signed consent forms to allow for medical treatment and medicinal dispensing

Retention Time Period

Original: Year of participation + 4 years unless participant is a minor, then records need to be kept until minor reaches age 18. Destroy confidentially.

To: Georgia Thompson and PRB
From: Peg Eusch, CRM on behalf of UW System and UWROC
Date: 11-25-2013 - updated 2-14-2014
RE: Amending UWSH106 retention event.

The University Records Officer Counsel (UWROC) would like to request that the *Event* to the UW-System GRS for UWSH106 Student Health Care Medical Records be amended to Last Date of Encounter at University Health Services. It was found that the current event needed to be updated to make the retention schedule executable.

Amending the GRS for University Health Services

GRS# UWSH106

Student Health Center Medical Records

The student medical files contain comprehensive information on each student who receives medical services at the Student Health Center. It may include, but is not limited Problem Lists, Face Sheets, visit notes, encounter notes, telephone notes, lab tests, radiology tests, mental health tests, other diagnostic tests, physical exams, outside records, correspondence such as emails, messages, allergy injection records, immunization records, consent forms, WIR immunization reports, laboratory reports, T-B Skin Tests, progress notes, flow sheets, psychological reports, Billing records, notices of privacy practices and disclosures. These records are considered to be part of the designated set of health records and part of the legal health record guidelines which are center specific. Mental Health records are covered under UWSH122 Counseling Center Student Counseling Patient Files.

These records contain student information which is covered under the Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99).
Confidential and may contain PII.

Retention Time Period

Original: ~~Last semester of attendance + 10 years and then destroy confidentially.~~ Change Event from Last Semester of Attendance to

EVT + 10 Years EVENT= Last Date of Encounter at University Health Services (UHS)

Mate Blum 3/5/14
State Archivist

G. Thompson 3/14/14
Executive Secretary-PRB

APPROVAL SUBJECT TO 10-YEAR
SUNSET. RESUBMITTAL REQUIRED
PRIOR TO March 2024