

 HAWAII HEALTH SYSTEMS CORPORATION <i>Quality Healthcare for All</i> POLICY	Department: Legal	Policy No. HIM 0001A
		Supersedes Policy No.
Subject: Administrative Closure of Incomplete Medical Records	Approved By: <i>Stephany Vaioleti</i> HHSC Board of Directors By: Stephany Vaioleti Its: Secretary/Treasurer	Approved Date: January 26, 2023
		Last Reviewed: September 23, 2022

I. **PURPOSE:** This policy establishes guidelines to administratively close incomplete inpatient medical records, after all avenues to provide clinicians with opportunities to complete documentation have been exhausted. The intent of this policy is to ensure that inpatient medical records shall not remain delinquent in perpetuity.

II. **DEFINITIONS:**

The following terms used herein are defined in this Section II. Any other terms used in this policy are defined by the Hospital and Critical Access Hospital Conditions of Participation rules and CMS State Operations Manual (“SOM”) Appendices A and W.

“Incomplete Medical Records” – are records that do not contain the required document(s) or required information or signatures, or both, on the document(s) as required by Hawaii Administrative Rules section 11-93-21, CMS SOM Appendix A, Sections A-0431 to A-0469, CMS SOM Appendix W, Sections C-0300 to C-0311, CMS SOM Appendix PP, Sections F514 to F515.

“Delinquent Medical Records” – are documents or medical records that are incomplete thirty (30) days after the respective patient’s discharge.

III. **POLICY:**

A. In the event that a clinician fails to complete medical record documentation and is either no longer employed by HHSC or is no longer associated with the HHSC facility, the respective HHSC facility Health Information Management (“HIM”) department shall attempt to contact the clinician and request completion of the medical record(s) in accordance with that facility’s standard practices.

B. If reasonable or good faith attempts to contact the clinician are unsuccessful, the respective facility HIM department shall administratively close the Incomplete Medical Record in accordance with that facility's standard practices. Such attempts shall be documented in accordance with that facility's standard practices. Notwithstanding, the respective facility HIM department may administratively close any Delinquent Medical Record in accordance with that facility's standard practices.

C. If the medical record is incomplete due to permanent physical or mental incapacitation or death of a clinician, a request for closure shall be submitted to the respective HHSC facility's HIM department without following the facility's standard practices.

IV. APPLICABILITY: This policy applies to the following HHSC facilities:

- Hilo Medical Center
- Hale Ho'ola Hamakua
- Ka'u Hospital
- Kohala Hospital
- Kona Community Hospital
- Kauai Veterans Memorial Hospital
- Samuel Mahelona Memorial Hospital
- Leahi Hospital
- Maluhia

V. AUTHORITY:

- 45 C.F.R. Parts 160 and 164; 42 C.F.R. §§ 482.24, 483.75(l) and 485.638, Hawaii Administrative Rules § 11-93-21;
- CMS SOM Appendix A – Survey Protocol, Regulations and Interpretive Guidelines for Hospitals, available at https://www.cms.gov/Regulations-and-guidance/Guidance/Manuals/downloads/som107ap_a_hospitals.pdf;
- CMS SOM Appendix W – Survey Protocol, Regulations and Interpretive Guidelines for Critical Access Hospitals (CAHs) and Swing-Beds in CAHs, available at https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/som107ap_w_cah.pdf;
- CMS SOM Appendix PP – Guidance to Surveyors for Long Term Care Facilities, available at http://www.hhsc.org/wp-content/uploads/ADM_0038A_Records_Release_and_Schedule_of_Charges.pdf

As all such regulations and rules may be amended from time to time.

VI. ATTACHMENTS: None.