UNIVERSITY OF WISCONSIN - MADISON

RECORDS RETENTION AND DISPOSITION SCHEDULE
FOR
University Health Services (UHS) - 579700

2015
We the undersigned have reviewed the above records series and approve the outlined retention and disposition. Approval is contingent on restrictions on records destruction contained in S.19.33 (5), Wisconsin Statutes (Open Records Law) and that no records are destroyed if litigation or audit involving these records has commenced or is imminent.

Dean/Department Chair/Administrative Officer
Sarah V. Orman
Date 3/11/15

Dean/Dept. Chair/Admin. Officer-PLEASE PRINT
Carrie Dallmeyer
University Legal Counsel
Date 3/20/15

Margaret E. Eusch, CRM
University Records Officer
Date 3/20/15

Date 3/20/15

University Archivist
Date JUN 10 2015

Date 7/10/15

State Archivist

APPROVAL SUBJECT TO 10 YEAR SUNSET. RESUBMITTAL REQUIRED PRIOR TO JUNE 2025

Executive Secretary - PR

University of Wisconsin - Madison Retention and Disposition Schedule
I. INTRODUCTION AND PURPOSE
This retention schedule represents the official University of Wisconsin-Madison policy with regard to the retention and disposition of all university and public records and information and has the approval of the University Records Management Advisory Group (URMAG) and the Wisconsin Public Records Board (PRB). The PRB is the statutory body with the responsibility to safeguard the financial, legal, administrative, and historical interests of the State in the disposition of records through the review of records schedules prepared by State agencies.

This retention schedule also provides guidance to University of Wisconsin-Madison employees regarding what does and does not comprise a public record. The UW-Madison campus must manage all records to ensure systematic control from creation or receipt through processing, distribution, maintenance, retrieval, retention and final disposal for records retention purposes.

II. SCOPE:
This schedule pertains to the records and information arising from currently understood UW-Madison record policies and procedures. It applies to all such records regardless of format or media. While an attempt has been made to describe the records in commonly used terms, there may be instances in which the schedule does not reflect the exact title or name used by a given department. If offices or departments cannot determine by the descriptive information provided on each item whether a given departmental record is covered or not, they should contact the University Records Officer. An attempt has been made to include all records commonly required or used within the University campus. However, as processes change, forms may be modified and new ones created, and documentation requirements may also change. This schedule will be reviewed periodically to insure that it is kept as up-to-date as possible. This schedule applies to all organizational units of the University of Wisconsin-Madison and any attached entities that are required to follow UW-Madison policies.

III. SUSPENSION OF THE RECORDS RETENTION SCHEDULE
University and Public Records may be delayed from disposition / destruction only under the following conditions:

1. Particular records have been identified as needed for a financial or performance audit.

2. Records that are required for legal proceedings are held under a "litigation hold" for an actual or imminent legal proceeding. Imminent meaning legal action is anticipated or there is reasonable expectation thereof.

3. An open records request has been received and not completed. Contact University Relations. See Office of Legal Affairs - Public Records http://legal.wisc.edu/public-records.htm
4. The Wisconsin Open Records Law, Wis. Stat. § 19.35(5), Wis. Stats, forbids the destruction of any record after an inspection or copying request until the request is granted, or at least 60 days after the date that the request was denied. Court orders and litigation may extend this time period. The agency's legal custodian of records can provide advice. For the University of Wisconsin Madison the legal custodian is the University Relations in the Chancellor's Office.

5. "It is the responsibility of the office holding the record to determine if an audit or litigation is pending, anticipated or imminent, or if an open record request is pending or the time specified in Wis. Stat. § 19.35(5) has not yet elapsed.

1. **UTILITY AND FUNCTION OF INFORMATION PROVIDED WITHIN THIS DOCUMENT**

   a. **Minimum Retention Established and Permanent Retention Procedure.** The records retention 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 or transfer to the UW Archives.

   b. **Materials That Comprise Public Records.**

   Under Wisconsin law, many materials comprise public records performing the transaction of public business on behalf of the University Campus. Under Wis. Stats. § 16.61, Public records are defined as "all books, papers, maps, photographs, films, recordings, optical disks, electronically formatted documents or other documentary materials, regardless of physical form or characteristics, made, or received by any state agency or its officers or employees in connection with the transaction of public business”

   c. **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 Campus. Thereafter, in the interest of efficiency and proper resource management, they should be destroyed. Under Wis. Stats. § 16.61, the definition of "Record" does not include: duplicate copies of materials the original copies of which are in the custody of the University and which are maintained only for convenience or reference and for no other substantive purpose; materials in the possession of a library or museum made or acquired solely for reference or exhibition purposes; notices or invitations received by the University that were not solicited by the University and that are not related to any official action taken, proposed or considered by the University; drafts, notes, preliminary computations and like materials prepared for the originator's personal use or prepared by the originator in the name of a person for whom the originator is working; and routing slips and envelopes.

   d. **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 many electronic systems. Because of the potential for electronically-preserved information to be lost over time as electronic systems degrade or become obsolete, electronic systems should be used as the primary manner of preserving historical documents only if measures are implemented to ensure appropriate updates to the electronic storage systems are consistently purchased, installed, and maintained, and to ensure the
appropriate migration of the electronically-stored information as electronic systems become obsolete and are replaced by new technologies.


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 University Records Officer.

Using the Schedule

- Use the table to locate the record series item.
- Identify whether you are the holder of the official, department, or copy of the record.
- Implement the retention and disposition noted at the level of record you hold.
- If you are uncertain about the records series item or your responsibility for it, contact the Records Officer for clarification.
- Retention periods and disposition methods outlined in this document have been reviewed and approved by the University (University Records Management Advisory Group (URMAG) – Consisting of signatures from University Archivist, Office of Legal Affairs and the University Records Officer).
The University Health Service was founded in December 1910, a time when college campuses regularly confronted outbreaks of infectious diseases such as typhoid. For the first 80 years, the health service was primarily a medical clinic, although in 1968, it initiated an Environmental Health Program to help maintain air, water, and food safety on campus. In 1993, the university's Counseling and Consultation Services became part of UHS, which resulted in a name change to become "University Health Services." At this time, UHS began to broaden its prevention services and the Wisconsin Clearinghouse for Prevention Resources also joined UHS. University Health Services (UHS) is the student health center at UW–Madison. UHS endeavors to provide high-quality care in a manner that is culturally respectful, fiscally responsible, and developmentally appropriate to student needs. At UHS, we have an integrated care model, combining a wide range of medical, mental health counseling, prevention, occupational medicine, occupational health, and wellness services to help support individual students and staff so they can be personally and academically healthy and successful. On average, we provide more than 90,000 student visits a year in our combined services. The UHS provides services mostly to the Student Population but now also provides Occupational Medicine and Occupational Health services to faculty and staff who work in research settings and UW-Madison students.

This Schedule covers the following record series.

1. **UHS Patient Health Care Records (Clinical Records, Patient Counseling and Mental health records)**
   This records retention policy addresses the all patient health records which are all managed in an Electronic Health Records/Practice Management System (EHR/PMS). This system manages both employee and students and does not have the ability to separate retention time frames for the different record types. Patients in this health information management system may have more than one document type and have been seen in more than one specialty such as Clinical, and Counseling. For continuity of care, the retention of these records have been extended to EVT + 20 EVENT= Date of Last Encounter. Please refer to UHS Policy on the Designated Record Set and Legal Health Record for other types of records. (See Records Series 57001832 below for specific retention and disposition.)
   
   a. Patient Health Records = students/non-students/employees or both in this system.
   
   b. Counseling Health Record = students/non-students or both in this system.

2. **UHS Health Students Entrance Medical Forms/History Form – Not Seen**
3. **UHS Employee Occupational Health and Medicine Records**
4. **UHS Health Center Master Patient Index (MPI)**
5. **UHS Quality Assurance, Peer Review and Risk Management Records**
6. **UHS Community Outreach Prevention and Education Program**
7. UHS X-ray Films

*ACCESS REQUIREMENTS:

APPRaisal note:
Master Patient Index are to be retain permanently to track for long term statistical information. UHS will retain these permanently due to confidentiality requirements, but older microfilm from 1921 through 1980 are retain by the UW-Madison Archives. See record schedule on next page.
<table>
<thead>
<tr>
<th>Record Series ID Number</th>
<th>Record Series Title</th>
<th>Record Series Description</th>
<th>Retention</th>
<th>Media Type</th>
<th>Disposition</th>
<th>Office of Record</th>
</tr>
</thead>
<tbody>
<tr>
<td>57001832</td>
<td>UHS Patient Health Care</td>
<td>This record series includes but not limited to the following types of patient health information: *Patient Clinical Records which contain information on each person that received medical care. Records may include but are not limited to: Demographic Information, Problem Lists; Visit/Encounter Notes; and Provider Progress notes, Telephone Notes, Orders, Surveys &amp; Questionnaires, Secure Messages, Medication Lists, Results from Diagnostic Tests, Treatment notes, X-ray Reports, Vaccinations or Laboratory evidence of immunity or history of disease, copies of outside provider notes or records pertaining to any of the above and Pharmacy Records. See UHS Designated Record Set and Legal Health policy</td>
<td>Retention: EVT + 20 Years EVENT = Date of Last Encounter</td>
<td>Electronic managed in Patient Health Information System</td>
<td>Destroy Confidential</td>
<td>University Health Services</td>
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<tr>
<td></td>
<td>Records</td>
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<td>Copies: Destroy when no longer needed, but not longer than the Originals.</td>
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<td>Supersedes</td>
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<td>Confidential: Yes or PII: Yes</td>
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<td>UWSH106</td>
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<td>PII Registry: Yes – d. these records contain employee information.</td>
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<td>UWSH107</td>
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<td>* See Access Requirements</td>
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<td>UWSH113</td>
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<td>UWSH123</td>
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<tr>
<td>Code</td>
<td>Description</td>
<td>Retention</td>
<td>Format</td>
<td>Confidentiality</td>
<td>PII Registry</td>
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</tbody>
</table>
| 57001833      | UHS Health Students Entrance Medical Forms/History Form – Not Seen | Retention: CR + 6 years  
CR = Date of Creation.  
Copies: Destroy when no longer need, but not longer than the Originals.  
Confidential: YES  
OII or PII: Yes | Paper/Electronic | Destroy Confidential | No             |

*Patient Counseling and Mental Health records such as counseling and mental health notes and reports, surveys and questionnaires, release forms, secure messages, consents, outside provider records, mental health tests and psychological reports. These files may be used for crisis intervention and monitoring progress of patient. And Pharmacy Records. (See internal policy for UHS Designated Record Set and Legal Health Record)
| 57001834 | **UHS Employee Occupational Health and Medicine Records** | Employee Health Record = patient health records created and maintained in the course of furnishing either UHS or UW occupational health, and occupational medicine services for the following purposes:  
- Applying employee health data to job placement;  
- Documenting employee health over time;  
- Providing data for use in health program evaluation;  
- Fulfillment of regulatory requirements.  
These records include but are not limited to: waiver or declinations forms, consents and notices to employees, post exposure evaluations, pre-employment physicals, medical health care provider
<p>| <strong>RetentionPolicy:</strong> CR + 75 Years |
| | <strong>Copies:</strong> Destroy when no longer need, but not longer than the Originals. |
| | <strong>Confidential:</strong> Yes or PII: Yes |
| | <strong>PII Registry:</strong> Yes – d. these records contain employee information. |
| | <strong>See Access Requirements</strong> |
| | <strong>OSHA 29CFR 1920</strong> |
| | <strong>Electronic/Paper</strong> |
| | <strong>Destroy Confidential</strong> |
| | <strong>University Health Services Environmental Health and Safety. NEW</strong> |</p>
<table>
<thead>
<tr>
<th>57001835</th>
<th>UHS Health Center Master Patient Index (MPI)</th>
<th>The record series contains a record of all patients who received care at the UHS. The Master Patient Index contains the following patient information: the Patient’s Medical Record Unit Number, Patient’s Legal Name, DOB, Gender, Race, Ethnicity, Address, Campus ID, Account #, Admission or Encounter dates, Discharge or Departure dates, Encounter or Service Type,</th>
<th>Retention: PERMANENT</th>
<th>Paper/Electronic</th>
<th>See Appraisal Note: UHS Retains Permanently to track for long term statistical information.</th>
<th>University Health Services Supersedes UWSH115</th>
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</thead>
<tbody>
<tr>
<td>UHS Quality Assurance/Improvement, Peer Review and Risk Management Records</td>
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<td><strong>Record series contains UHS studies and quality assessment in Healthcare documentation which are utilized to improve the quality of health care. They include, but are not limited to, quality assurance studies, peer review and case review, risk management reports, satisfaction surveys and American College Health Associations (ACHA) – National College Health Assessments (NCHA) and Methods Reports.</strong></td>
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<td><strong>This records series also includes complaint forms or surveys to be completed on optional bases by any patient. These forms include the date, nature of the complaint and a comment section. The staff person’s name and the patients name are optional.</strong></td>
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<td><strong>Retention:</strong> EVT + 6 years EVENT = Date of Completion of UHS investigation, audit or review. <strong>Copies:</strong> Destroy when no longer need, but not longer than the Originals. <strong>Confidential:</strong> No or PII: YES <strong>PII Registry:</strong> Yes – d. these records contain employee information.</td>
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<tr>
<td>Electronic/Paper</td>
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<td>Destroy Confidential</td>
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<td>University Health Services Superseding UWSH117 UWSH125</td>
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<tr>
<td>Code</td>
<td>Description</td>
<td>Retention:</td>
<td>Medium</td>
<td>Transfer to</td>
<td>Notes</td>
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<tr>
<td>57001837</td>
<td>UHS Community Outreach Prevention and Education Program</td>
<td>EVT + 6 years EVENT = Date of Creation</td>
<td>Paper/Electronic</td>
<td>Transfer to UW-Archives</td>
<td>University Health Services Supersedes UWSH118</td>
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<td>Record series includes informational materials on community outreach prevention and education programs provided to the clients. This includes but is not limited to posters, circulars, contest materials as well as program related reports.</td>
<td>Copies: Destroy when no longer need, but not longer than the Originals.</td>
<td>Confidential: No or PII: YES PII Registry: No</td>
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<tr>
<td>57001838</td>
<td>UHS X-ray Films</td>
<td>EVT + 10 years EVENT = Date of Last Encounter</td>
<td>Film</td>
<td>Destroy Confidential</td>
<td>University Health Services New</td>
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<tr>
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<td>Record series includes patient x-ray films taken in the course of treating patients.</td>
<td>Copies: Destroy when no longer need, but not longer than the Originals.</td>
<td>Confidential: YES or PII: YES</td>
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</tbody>
</table>
The following record series were superseded or closed for UW-Madison use.

UWSH100 Student Health Center Directors Correspondence. Superseded by GRS Administrative: UWADM003 Alphabetical/Topical Files
UWSH101 Student Health Center Administrative Subject Files. Superseded by GRS Administrative: UWADM003 Alphabetical/Topical
UWSH102 Student Health Center Annual Reports. Superseded by GRS Administrative: UWADM023 Annual/Summary Reports
UWSH103 Student Health Center Meeting Records. Superseded by GRS Administrative: UWADM018 Agendas/Minutes
UWSH104 Student Health Services Health Insurance Records Closed Records series.
UWSH105 Student Health Services Health Advisory Committee Records. Superseded by GRS Administrative: UWADM018 Agendas/Minutes
UWSH108 Student Instructional Camp Health Records (Non-Athletic) See UW-Madison GRS for Camp Records
UWSH109 Student Health Center Daily Log. Closed Record Series
UWSH111 Student Health Center Visit and Coding Statistics. Closed Record Series
UWSH110 Student Health Center Appointment Schedule and Statistical Logs. Closed Record Series.
UWSH114 Student Health Center Laboratory Reports – Copies. Closed Record Series
UWSH119 Counseling Center Administrative Subject Files. Superseded by GRS Administrative: UWADM003 Alphabetical/Topical Files
UWSH120 Counseling Center Annual Reports. Superseded by GRS Administrative: UWADM023 Annual/Summary Report
UWSH121 Counseling Center Meeting Records. Superseded by GRS Administrative: UWADM018 Agendas/Minutes
UWSH127 Student Athletics Student Athlete Medical Files. See UW-Madison GRS Student Records
UWSH128 Student Athletics Athlete Diagnostic Tests. See UW-Madison GRS Student Records
UWSH129 Sports Camp Medical Records. See UW-Madison GRS for Camp Records

PII Registry: Yes – d. these records contain employee information.
*See Access Requirements