



Michigan Breast and Cervical Cancer Control Navigation Program (BC3NP) Policy for Retention of BC3NP Client Records

Effective Date October 1, 2019

Purpose:

Provide guidelines for agencies on time frames for retention of BC3NP clinical data.

Time Frame for Retention of BC3NP Clinical Data

- A. Clinical data for BC3NP clients who receive breast and/or cervical cancer screening and diagnostic services are to be retained by the local coordinating agency for the specified time period as stated in this policy.
- B. These guidelines pertain ONLY to BC3NP local coordinating agencies, NOT subcontracted providers. Agencies that have clinical data retention policies should continue to follow those policies unless the time frames stated in those policies are LESS than the guidelines stated in C and D.
- C. For agencies using Electronic Medical Records:
 1. Clinical data must be verified for accuracy and completeness prior to being entered in MBCIS and authorized for reimbursement by BC3NP.
 2. Agencies that document client care in Electronic Medical Records DO NOT need to print paper copies of medical records if these records can be accessed to verify test results and care provided for BC3NP women.
 3. Results recorded in the Electronic Medical Record must be able to be accessed for the CURRENT year plus 3 years previous or for client duration in the program if less than 3 years.
- D. For agencies that DO NOT use Electronic Medical Records:
 1. The following clinical data/forms must be retained at the BC3NP agency for a duration of the CURRENT year plus 3 years previous.
 - a. BC3NP Client Enrollment form
 - b. Signed Agreement for Program Participation form
Note: To eliminate the number of paper copies, the agency can add separate client “initial and date” lines to the bottom of current consent forms.) This can be reviewed with the client at each renewal period.
 - c. BC3NP Screening Form- Pap test/Mammogram Results
 - d. Breast and/or Cervical Follow-up Forms
 - e. Patient Navigation Forms
 - f. Copies of all imaging, pathology reports, consult notes, progress notes
 2. For MTA enrolled client’s forms must be retained at the BC3NP agency for a duration of the **current** year plus 7 years previous.
 - a. Signed initial MTA Enrollment Form and Re-Enrollment Forms
 - b. Client citizenship and identify documentation
 - c. Provider/Agency progress notes describing care of client within current year and previous 7 years