

State of Iowa Department of Corrections Policy and Procedures

Policy Number: HSP-306

Applicability: Institutions

Policy Code: Public Access

Iowa Code Reference: N/A

Chapter 6: Health Services

Sub Chapter: Health Record

Related DOC policies: AD-CR-01, HSP-504, HSF-615

Administrative Code Reference: N/A

Subject: Retention of Inactive Medical Records

ACA Standards: 5-ACI-6D-07

Responsibility: Dr. Michael Riley

Effective Date: September 2025

Authority:

1. PURPOSE

To ensure appropriate retention, storage, and destruction of medical records in accordance with applicable state of Iowa and federal law, professional standards, and Iowa Department of Corrections (IDOC) a proper procedure for the retention of medical records within the Iowa Department of Corrections (IDOC) in accordance with mandates of the state of Iowa.

2. POLICY

It is the policy of the Iowa Department of Corrections to provide for the retention and maintenance of medical records for legally defined timeframes in accordance with mandates of the state of Iowa and to maintain them securely for reference, continuity of care, and risk management.

3. DEFINITIONS - As used in this document:

- A. Inactive Medical Record: A health record for an individual no longer in IDOC custody or medical care.
- B. Litigation Hold: A directive to preserve records beyond the standard retention period due to ongoing or anticipated legal matters.

- C. Destruction: Irretrievable disposal via shredding, secure digital deletion, or contracted secure destruction.

4. PROCEDURES

A. Retention Timeframes

1. Adult Patient Medical/Mental Health Record. The minimum retention period is 10 years from the last date of service or release from IDOC.
2. Youthful Patient Medical/Mental Health Record. The minimum retention period is until the individual reaches age 28 (i.e., 10 years after age majority).
3. Death in Custody Records. The minimum retention period is 10 years from the date of death.
4. X-rays. The minimum retention period is 5 years or 10 years if related to pending litigation or ongoing medical concern.
5. Records Under Legal Litigation Hold. The records shall be retained indefinitely until litigation is resolved, then applicable retention period is applied. If any medical record is involved in a known investigation, litigation, or grievance then a hold shall be placed on them immediately.

B. Mandatory Documents to be Scanned into ICON Medical

All medical records shall be scanned into ICON Medical prior to the patient's release from the Department of Corrections. The following shall be included:

1. Death Certificate (if applicable)
2. Autopsy Report (if applicable)
3. Iowa Physician Orders for Scope of Treatment - IPOST (if applicable)

C. Destruction

Records shall be destroyed in accordance with IDOC records management policies and HIPAA privacy rules. Each destruction must be logged and include patient name and ID number, last date of service, destruction date, destruction method, and signature of authorizing staff member.

D. Employee Inactive Medical Records

1. Inactive hard copy medical records must be stored in a secure, access-controlled location. Electronic records shall be archived in a secure database with restricted access and audit trail capability. Only the Health Services Administrator or designee(s) may access inactive records.
2. Employee inactive medical records shall not be archived off-site or uploaded to a long-term storage system.