

# **INOVA FAIRFAX MEDICAL CAMPUS GRADUATE MEDICAL EDUCATION POLICY**

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## **Institutional Policy on Content, Access and Retention for Files of Residents and Subspecialty Residents/Fellows**

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### **I. Purpose:**

To establish a policy describing the procedure that will govern intern, resident and fellow files related to their training at Inova Fairfax Medical Campus (“Hospital”).

### **II. Scope:**

This policy applies to all ACGME-accredited and CPME approved training sponsored by the Hospital. This policy pertains solely to the data relevant to the educational experience. Information that is primarily non-educational in nature, if documented, should be kept in a separate confidential file. Release of said information will only occur with written authorization from the individual resident or through legal process.

### **III. Definitions:**

“House Staff/House Officer” – refers to all interns, residents and fellows enrolled in a post-graduate training program.

### **IV. Responsibilities/Requirements:**

- A. Each graduate medical education program sponsored by the institution will maintain a file concerning each House Officer’s experience at the Hospital.
- B. The file will contain a record of the House Officer’s application to and acceptance in the program (including documents listed in the Resident Agreement), specific rotations and other training experiences (including training procedures), written evaluations from the faculty and others, the periodic summative evaluations by the Program Director and evaluation committee, any institutional disciplinary actions, periods of leave if applicable and other information concerning the House Officer that the Program Director judges appropriate to maintain in the file for purposes of evaluation and training, including records required to be maintained by applicable Institutional and Program Requirements of the ACGME or CPME.
- C. The file will be regarded as confidential, will be maintained in a secure location and, except as provided below, will be available only to the Program Director, the Director of Graduate Medical Education, the program’s evaluation committee, and designated administrative staff in the Department of Graduate Medical Education and in the applicable post-graduate training program offices. The following will be printed on the exterior of each file:
  - 1) This file contains confidential information.
  - 2) Access to this file and the information contained therein is governed by the Content, Access and Retention Policy for Files of Residents and Subspecialty Residents/Fellows.
  - 3) Access to this file and the information therein may be governed by state and federal patient privacy laws, including the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) and its Privacy and Security Standards.
- D. The Program Director and the Director of Graduate Medical Education may disclose the file, or portions thereof, to others whom they determine have a legitimate need for the information for reasons relating to the education of the House Officer, the quality of education in the program or the quality of patient care in the program. The Program Director and the Director of Graduate Medical Education may also disclose the file, or portions thereof, to others, as authorized in writing by the House Officer. Further, the file may be disclosed as required by law.

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- E. House Officers will always have access to their evaluations through the electronic evaluation system (MedHub). Any additional documentation maintained by the program is available for review by the house officer under the supervision of his or her Program Director.
  
- F. Upon completion of a training program, where the House Officer will be recommended for Board certification, only the final summative evaluation of the House Officer, the record of the House Officer's specific rotations and other training experiences (including training procedures) and a record of any disciplinary actions must be retained in the file. The file will then be maintained as a permanent record. The Program Director may exercise his or her discretion to retain other records for which there may be particular need.
  
- G. For House Staff who do not complete the training program, or who complete the training program but who will not be recommended for Board certification, the entire file will be maintained as a permanent record.