



HEALTH AFFAIRS

THE ASSISTANT SECRETARY OF DEFENSE

WASHINGTON, D C 20301-1200

JUL 22 2003

MEMORANDUM FOR ASSISTANT SECRETARY OF THE ARMY (M&RA)  
ASSISTANT SECRETARY OF THE NAVY (M&RA)  
ASSISTANT SECRETARY OF THE AIR FORCE (M&RA)

SUBJECT Custody and Control of Outpatient Medical Records at Department of Defense  
Military Treatment Facilities

Medical records are the property of the Department of Defense (DoD) and their maintenance and availability at the military treatment facility (MTF) is key to appropriate medical care and legal and administrative proceedings. In April 1999, our system was cited by the DoD Inspector General (IG) regarding the difficulty of locating outpatient records and the inability to validate workload due to the lack of supporting documentation. Additionally, a recent Iowa Foundation Report cited the inability to locate some outpatient medical records at 50 MTFs required for a coding audit. The consequences associated with the paucity of documentation regarding medical care raises accreditation questions and weakens the Department's confidence in the direct care system. I have the following expectations concerning the Department's MTF medical record custody program:

- (1) Appropriate medical documentation be available to substantiate the healthcare provided in our inpatient and ambulatory settings
- (2) MTFs establish custody program for control of medical records.
- (3) A record of healthcare be retained at the site where healthcare is provided
- (4) When care is provided in and out of the MTFs, copies of consults/treatment records should be provided to patients' primary care site for inclusion in government maintained patient records. Copies may be provided to patients as requested
- (5) Copies of appropriate portions of the medical record be provided with consult requests
- (6) Discontinue using patients as means of transporting medical records
- (7) Beneficiary education is a cornerstone of the medical records custody policy
- (8) The Computerized Patient Record (CPR) is the planned solution for medical record custody

Outlined below are immediate actions required to return outpatient medical records to MTF custody:

- (1) Maintain 95 percent availability of all outpatient health records, goal is 100 percent
- (2) Monitor outpatient medical record availability metrics deployed by my office in the Data Quality Management Control Program (DQMC) (DoDI 6040.40 of 26 November 2002)
- (3) Facilitate local medical record audits.

- (4) Implement Military Department outpatient medical record availability compliance through your IG and Audit Agency
- (5) Include health record availability in commanding officer performance reports

Your assistance in ensuring that our MTFs implement improved custody and control procedures for outpatient medical records is appreciated. I request your report of the implementation of these measures within 90 days of the date of this memorandum. Full implementation is expected by October 1, 2003.

The point of contact for this action is Mr. David Fisher, TMA/RM (MC&FS). He may be reached at (703) 681-3492, ext. 4078.



William Winkenwerder, Jr., MD

cc  
Surgeon General of the Army  
Surgeon General of the Navy  
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