



wisconsin department of
children & families

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Governor Scott Walker
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Division of Safety and Permanence

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Child Welfare Licensing Memo Series 2012-11L

To: Private Child Placing Agencies
Residential Care Center Providers
Group Home Providers
Child Placing Agency Directors

From: Ron Hermes 
Bureau Director

RE: **Use of Electronic Records**

The purpose of this memo is to inform private child placing agencies, group homes, shelter care and residential care centers of the Department's policy regarding electronic records. The Department requires licensed agencies that use electronic records for staff, residents, foster children and foster home records to develop policies and procedures regarding the use of electronic records and submit the proposed policies and procedures to their licensing specialists prior to implementation. The policy and procedures that are submitted must reference the rule number for each specific record that will be stored electronically. In order to assist each agency in this process, the rule number for each of the records can be found on the licensing checklist. (See e.g., Residential Care Centers- CFS-2139-E, CFS-2140, Group Homes- CFS-379 and CFS-383. Child-Placing Agencies- CFS-380, CFS-369, and CFS-381 and Shelter Care Facilities- CFS-2389 and CFS-2399.) All of these licensing checklists can be found on the child welfare forms website at <https://dcf.wisconsin.gov/cwlicensing/forms>

The policies and procedures must contain the following topic areas to ensure the safety and confidentiality of all electronic records:

- A description of how confidentiality will be maintained for the records.
- The process to ensure the integrity of the data being entered into the electronic file
- Identify which staff that will have access to the files and what type of access staff will have, such as, read only or access to edit files or limited access to edit specific areas in the electronic file.
- An explanation of how data will be time stamped to ensure integrity of the electronic records.

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- A description of the data back-up process and firewall protection for the information.
- A description of the specific records that the agency intends to maintain electronically. For example, personnel, residents, foster children, foster home, or adoption files.
 - If only parts of the files are going to be electronically maintained, please describe which parts.
- A description of how information may be shared electronically with a purchaser and what protections are put in place to ensure confidentiality of those records.
- A description of how the child's records will be maintained electronically, access to files; and, if line staff do not have access to electronic files, a description of how the line staff will be kept up to date on the child's progress, including records of treatment plans and progress notes.
- A description of the process that provides access to electronic records to the Department or for any other governmental agency that has authority to have access to the records at the time of the visit. The process should include:
 - The location on premises of where the Department or other agencies will view the electronic records and which people within the agency will be assigned to facilitate the review.
 - Whether electronic records will be read only for any records reviewed by others outside of your agency

If you have any questions regarding this requirement, please contact your licensing specialist.

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