

6. Topic: Removal of Client Data from MACSIS

The purpose of these guidelines is to establish the criteria and process for removing protected health information (PHI) from MACSIS, Mental Health (MH) Outcomes and the Behavioral Health Module and to establish ODMH, ODADAS and board responsibilities.

A. Conditions

The following matrix illustrates various scenarios of when it is and is not permissible under applicable federal and state statutes and policies for the State to delete protected health information (PHI) from the ODMH and ODADAS systems.

Scenario	Delete	Comments
Client enrolled but has no claims	Yes	Follow process below
Client has received services(s) paid in whole or part with public funds	No	Information needs to be maintained in accordance with Business Records retention schedule
Client has received services but they have NOT been paid in whole or part with public funds.	Yes	MACSIS Guidelines – Topic 2 indicates that only those clients receiving services funded in whole or in part with public funds administered through the boards will be enrolled in MACSIS.

B. Process

1. The MACSIS Support Desk, hereinafter referred to as State, will timely process requests submitted by the board to remove client information from MACSIS.
2. Documentation to substantiate request to remove client information should be maintained at the local level (board and/or provider) and not routinely submitted to the State. The State reserves the right to request information as necessary to timely process the request.
3. Boards or providers can initiate a request on behalf of the client by completing the [Request to Remove Client from MACSIS form](#). Reason for request must be documented and approved by board prior to submission to the State. Board approval process should include but not be limited to the following:
 - Exploration to assure client has not received services paid in whole or part with funds administered through requesting board. Board should verify this by checking to make sure that a net amount of zero is not the result of benefit rules, rider codes or 100% withhold (i.e. clients served in Women’s Set-Aside Grant Program shall not be submitted for deletion).
4. State will verify client has not received services in other boards areas
5. If MACSIS has claims paid by a board other than from the requesting board then the State will work with those board(s) prior to removing client from database to assure services were not funded in whole or part with public funds (i.e. even if netted to zero)

- 6.** State will take action to remove member and claims information from the MACSIS on-line system. Information archived (on-line) or on back-up tapes will not be modified.
- 7.** State will take action necessary to remove client information from Outcomes database.
- 8.** Board(s) will be responsible for notifying provider of action taken by State.
- 9.** Provider(s) must submit a delete record to ODADAS in accordance with Behavioral Health Instruction Manual to delete client information from BH module.
- 10.** Boards and providers should take necessary action to remove client information from local databases and files.