

STAFFING

- 1. REASON FOR ISSUE:** To establish the Department of Veterans Affairs (VA) qualification standard for Medical Records Technician (MRT) (Release of Information (ROI)), GS-0675, appointed under 38 U.S.C. § 7401(3), and 38 U.S.C. § 7405(a)(1)(B).
- 2. SUMMARY OF CONTENTS/MAJOR CHANGES:** This handbook contains mandatory procedures on staffing. This policy establishes qualification standards for the MRT (ROI) occupation in Appendix II-G58 and removes the MRT (ROI) references and standards in Appendix II-G35. This qualification standard establishes lead MRT (ROI), supervisory MRT (ROI), and MRT (ROI-Legal) assignments. This policy is established under VA's hybrid title 38 excepted service employment system and the authority established under the "Caregivers and Veterans Omnibus Health Services Act of 2010" (Public Law 111-163). Authority is given to the Secretary of VA under 38 U.S.C. § 7402 to prescribe qualifications for occupations identified in or established under 38 U.S.C. § 7401(3) and 38 U.S.C. § 7405(a)(1)(B). This new qualification standard will be incorporated into the electronic version of VA Handbook 5005 that is maintained on the [Office of the Chief Human Capital Officer Website](#).
- 3. RESPONSIBLE OFFICE:** Recruitment and Placement Policy Service (059), Office of the Chief Human Capital Officer.
- 4. RELATED DIRECTIVE:** VA Directive 5005, Staffing.
- 5. RESCISSIONS:** None.

CERTIFIED BY:

**BY DIRECTION OF THE SECRETARY
OF VETERANS AFFAIRS:**

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**[APPENDIX G58. MEDICAL RECORDS TECHNICIAN (RELEASE OF INFORMATION)
QUALIFICATION STANDARD
GS-0675
Veterans Health Administration**

1. **COVERAGE.** Release of information falls under the jurisdiction of Health Information Management. The following are the requirements for appointment as a Medical Records Technician (MRT) (Release of Information (ROI)) in the Veterans Health Administration (VHA). These requirements apply to all VHA MRT (ROI) assignments in the GS-0675 series. The MRT (ROI) reviews and processes requests for patient protected health information (PHI). The MRT (ROI) also provides direct customer service to the Veteran (or third party), by providing copies of the Veteran's PHI, when a signed, written request is received, or upon the Veteran's valid authorization to a third party. The MRT (ROI) must ensure that only the information that the Veteran specified be released, is shared only with those whom the Veteran has authorized, or who have legal authority to receive such information. To perform this task, a MRT (ROI) must possess expertise in all applicable Federal laws, rules, and regulations regarding release of health information.
2. **DEFINITIONS.**
 - a. **Journey Level.** The full performance level for the MRT (ROI) assignment is GS-6.
 - b. **Creditable Experience.** Experience is only creditable if it is paid or non-paid employment directly related to the position to be filled, or in a related field such as medical support assistants, ward clerks, health record file room/scanning technicians, incomplete health record analysis, medical coding, or other positions that included knowledge of the content and use of health records. To be creditable, the candidate's experience must have demonstrated the use of knowledge, skills, and abilities associated with current release of information practice.
 - c. **Quality of Experience.** To be creditable, experience must be documented on the application or resume, and verified through an employment reference or other independent means.
 - d. **Part-Time Experience.** Part-time experience as a professional MRT (ROI) is creditable according to its relationship to the full-time workweek. For example, a MRT (ROI) would receive one week of full-time credit for each two weeks of half-time work.
 - e. **Predominant Specialty Area.** Lead and Supervisory MRT (ROI) whose assignments involve two or more MRT specialty areas will be assigned the parenthetical title for the predominant specialty area being led/supervised.

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APPENDIX G58**3. BASIC REQUIREMENTS.**

- a. **Citizenship.** Be a citizen of the United States. (Non-citizens may be appointed when it is not possible to recruit qualified citizens in accordance with chapter 3, section A, paragraph 3g, of this part.)

b. **Experience and Education**

- (1) **Experience.** One year of creditable experience that indicates knowledge of medical terminology and general understanding of health records. Six months of the required one year of creditable experience must have provided the knowledge, skills, and abilities (KSAs) needed to perform MRT (ROI) work.

OR,

- (2) **Education.** An associate's degree from an accredited college or university recognized by the U.S. Department of Education with a major field of study in health information technology/health information management, or a related degree with a minimum of 12 semester hours in health information technology/health information management (e.g., courses in medical terminology, anatomy and physiology, legal aspects of health care, and introduction to health records).

OR,

- (3) **Experience/Education Combination.** Equivalent combinations of creditable experience and education are qualifying towards meeting basic experience requirements. The following experience and educational/training substitutions are appropriate for combining education and creditable experience:

- (a) Six months of creditable experience that indicates knowledge of medical terminology, privacy and release of information, the health record, and one year above high school with a minimum of six semester hours of health information technology/health information management courses.
- (b) Six months of creditable experience that indicates knowledge of medical terminology, privacy and release of information, the health record, and successful completion of a course for medical technicians, hospital corpsmen, medical service specialists, or hospital training obtained in a training program given by the Armed Forces or the U.S. Maritime Service under close medical and professional supervision. The training program may be substituted on a month-for-month basis for up to six months of experience provided the training program included courses in anatomy and physiology, and health record techniques and procedures.

- c. **Grandfathering Provision.** All persons employed in VHA as a MRT (ROI) on the effective date of this qualification standard are considered to have met all qualification

requirements for the grade held, including positive education and licensure/certification/registration that are part of the basic requirements of the occupation. Employees who do not meet all the basic requirements in this standard, but who met the qualifications applicable to the position at the time they were appointed to it, the following provisions apply:

- (1) Such employees in an occupation that does not require a licensure/certification/registration may be reassigned, promoted, or demoted within the occupation, but will not be promoted beyond the journey level or placed in supervisory or managerial positions.
- (2) Employees who are appointed on a temporary basis prior to the effective date of the qualification standard may not have their temporary appointment extended, or be reappointed on a temporary or permanent basis, until they fully meet the basic requirements of the standard.
- (3) Employees initially grandfathered into this occupation, who subsequently obtain additional education and/or licensure/certification/registration that meet all the basic requirements of this qualification standard, must maintain the required credentials as a condition of employment in the occupation.

- d. **Physical Requirements.** See VA Directive and Handbook 5019, Employee Occupational Health Service.
- e. **English Language Proficiency.** MRTs (ROI) must be proficient in spoken and written English, as required by 38 U.S.C. § 7403(f).

4. GRADE REQUIREMENTS.

- a. **MRT (ROI).** All individuals assigned to this occupation must have an approved parenthetical title, as described below:
 - (1) MRT (ROI)
 - (2) MRT (ROI-Legal);
 - (3) Lead MRT (ROI); or
 - (4) Supervisory MRT (ROI).

5. GRADE DETERMINATIONS.

- a. **Medical Records Technician (ROI), GS-4**
 - (1) **Experience or Education.** None beyond basic requirements.

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- (2) **Assignment.** Employees at this level serve in entry level MRT (ROI) position and receive close supervision and support from more experienced ROI staff members. MRTs (ROI) receive and validate authorization forms and requests for information, and prioritize requests per policies and regulations. They use various computer applications to track and release all authorized ROI requests. They process and release health information to authorized first- and third-party requestors. MRTs (ROI) initiate and maintain the accounting of disclosure for all records disclosed from a Privacy Act system of records. They ensure compliance with policies, procedures, laws, and regulations governing privacy and release of information.

b. **Medical Records Technician (ROI), GS-5**

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level;
- OR,
- (2) **Education.** Successful completion of a bachelor's degree from an accredited college or university recognized by the U.S. Department of Education, with a major field of study in health information management, or a related degree with a minimum of 24 semester hours in health information technology/health information management (e.g., courses in medical terminology, anatomy and physiology, legal aspects of health care, and introduction to health records).
- (3) **Assignment.** Employees at this grade level serve in developmental positions as MRTs (ROI) and receive guidance from more experienced staff members for complex release of information procedures. They receive and validate authorization forms and requests for information and prioritize requests according to policies and regulations. They utilize various computer applications to track and release all authorized release of information requests. They also process and release health information to authorized first- and third-party requestors. They initiate and maintain accounting of disclosure for all records disclosed from a Privacy Act system of records. They communicate with internal and external stakeholders to provide technical expertise regarding the release of information process. They ensure compliance with policies, procedures, laws, and regulations governing privacy and release of information.
- (4) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Ability to utilize health information technology and various office software products utilized in MRT (ROI) positions (e.g., the electronic health record, release of information systems, etc.).
- (b) Knowledge of health record documentation guidelines and processes for disclosing protected health information.
- (c) Ability to manage priorities and coordinate work in order to complete duties within required timeframes, and the ability to follow-up on pending issues.

- (d) Knowledge of policies, procedures, laws, and regulations governing privacy and release of information.
- (e) Ability to communicate with individuals from various backgrounds to obtain the desired effect or gaining information by establishing rapport.

c. Medical Records Technician (ROI), GS-6

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Assignment.** This is considered the journey level for MRT (ROI) positions. Employees at this level apply, interpret, and analyze laws and regulations related to the disclosure of health information. MRTs (ROI) are responsible for educating requestors on requirements for submitting requests for health information. They receive and validate authorization forms and requests for information and prioritize requests according to policies and regulations. They use various computer applications to track and release all authorized release of information requests. MRTs (ROI) process and release health information to authorized first- and third-party requestors. They initiate and maintain the accounting of disclosure for all records disclosed from a Privacy Act system of records. They communicate with internal and external stakeholders to provide technical expertise regarding the release of information process. They ensure compliance with policies, procedures, laws, and regulations governing privacy and release of information.
- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
 - (a) Knowledge of the laws and regulations related to the authorization and disclosure of health information (e.g., Privacy Act, Freedom of Information Act, Health Insurance Portability and Accountability Act (HIPAA), and 38 U.S.C. § 7332, Confidentiality of Certain Medical Records).
 - (b) Ability to apply health record documentation guidelines and processes to navigate efficiently through the paper and/or electronic health record to locate, assemble, and disclose protected health information.
 - (c) Ability to apply policies, procedures, laws, and regulations governing privacy and release of information to process requests for release of information.
 - (d) Ability to research and solve difficult questions related to release of health information in an accurate and timely manner.

d. Medical Records Technician (ROI-Legal), GS-7

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.

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- (2) **Assignment.** For all assignments above the journey level, the higher-level duties must consist of significant scope, complexity (difficulty), range of variety, and be performed by the incumbent at least 25% of the time. MRTs at this grade level will serve as the sole point of contact, and accurately process and timely respond to complex medical legal requests, including, but not limited to, subpoenas, depositions, testimony, tortfeasor (Third Party Liability), Workers' Compensation, Labor and Industries, and court orders for information from attorneys, courts, local law enforcement agencies, public defenders, or insurance agencies. They serve as a liaison to Regional Counsels and U.S. Attorney's offices, for trial cases. They review and analyze requests to ascertain the type of case to be developed. MRTs (ROI -Legal) ensure all disclosures are made in compliance with existing policies, procedures, guidelines, laws, and regulations. They ensure that information released is limited to what is specifically authorized and to the person or agency designated to receive it. They maintain the accounting of disclosures for all legal cases. MRTs (ROI-Legal) compile the legal health record and provide advisory and technical assistance to patients and internal and external stakeholders pertaining to medical legal requests. They extensively research and resolve conflicting or inconsistent information related to complex medical legal requests.
- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Knowledge of the laws and regulations related to the authorization and disclosure of health information.
 - (b) Ability to apply laws and regulations related to the disclosure of health information (e.g., Privacy Act, Freedom of Information Act, HIPAA, and 38 U.S.C. § 7332, Confidentiality of Certain Medical Records).
 - (c) Ability to investigate the contents of paper and electronic health records and systems that contain health information to compile the legal health record based on existing standards and requirements.

e. **Lead Medical Records Technician (ROI), GS-7**

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Assignment.** For all assignments above the journey level, the higher-level duties must consist of significant scope, complexity (difficulty), range of variety, and be performed by the incumbent at least 25% of the time. This assignment is for facilities that cannot justify or support a MRT (ROI-Legal) assignment, and must place a lead MRT (ROI) over employees up to the journey level. Lead MRTs (ROI) monitor quality and quantity of work to ensure adherence to applicable requirements and regulations. They ensure the work assignments of the team are carried out by performing duties which include distributing and balancing workload, monitoring the status and progress of work, instructing and answering employee questions, checking employee work, and amending or rejecting work not meeting standards. Lead MRTs (ROI) develop training and provide resources pertaining to VHA and other Federal policies, guidelines, and regulations. They conduct training for all new

release of information staff regarding the software, the process of requesting archived health records, and the use of VHA computer applications. Lead MRTs (ROI) act as the technical experts and provide consultation regarding HIPAA and the Privacy Act, as it pertains to release of information.

- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Ability to work with a team to provide technical guidance, plan, organize, and coordinate activities of release of information to effectively complete job assignments (i.e., distributing workload, monitoring the status and progress of work, monitoring accuracy of work, and ensuring required timelines are met.)
 - (b) Knowledge of the laws and regulations related to the authorization and disclosure of health information.
 - (c) Ability to effectively communicate, both orally and in writing, to meet program objectives.
 - (d) Ability to prepare reports in various formats and present data to various organizational levels.
 - (e) Ability to provide or coordinate staff development and training.

f. **Supervisory Medical Records Technician (ROI), GS-7**

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Assignment.** For all assignments above the journey level, the higher-level duties must consist of significant scope, complexity (difficulty), range of variety, and be performed by the incumbent at least 25% of the time. This supervisory MRT (ROI) will be assigned responsibilities at smaller medical centers where a GS-7 Lead MRT (ROI) or MRT (ROI-Legal) assignment cannot be supported, justified, or established. The supervisory MRT (ROI) is responsible for the supervision, administrative management, and direction of ROI staff at or below the journey level. They generate workload reports, distribute pending workload to staff, and monitor completion status. They ensure timely release of health records in accordance with policies and procedures. The supervisory MRT (ROI) ensures orientation and competency assessment of assigned staff is conducted. They develop policies and procedures, performance standards, position descriptions, and/or functional statements. They maintain interdepartmental relations with other services to accomplish medical center goals. The supervisory MRT (ROI) also serves as the primary point of contact, and will accurately process, and provide timely responses to complex medical legal requests, including, but not limited to, subpoenas, depositions, testimony, court orders for information from attorneys, courts, local law enforcement agencies, and/or public defenders. They serve as a liaison to Regional Counsels and U.S. Attorney's offices, for trial cases. They compile the legal health record and research and resolve conflicting or inconsistent information related to complex medical and legal requests.

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- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Knowledge of the laws and regulations related to the authorization and disclosure of health information.
 - (b) Ability to manage and supervise individuals, set priorities, and schedule work assignments.
 - (c) Skill in interpersonal relations and conflict resolution.
 - (d) Ability to investigate the contents of paper and electronic health records and systems that contain health information to compile the legal health record based on existing standards and requirements.
 - (e) Ability to provide or coordinate staff development and training.
 - (f) Knowledge of and ability to provide a full range of supervisory duties, to include responsibility for assignment of work, performance evaluation, selection of staff, recommendations of awards, advancements, and disciplinary actions.

g. Lead Medical Records Technician (ROI), GS-8

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Assignment.** For all assignments above the journey level, the higher-level duties must consist of significant scope, complexity (difficulty), range of variety, and be performed by the incumbent at least 25% of the time. Lead MRTs (ROI) distribute and prioritize workload among employees. Individuals in this assignment perform lead functions over GS-6 MRT (ROI) and GS-7 MRT (ROI-Legal) positions. Lead MRTs (ROI) ensure an even workflow and distribution of the workload, as well as resolve workflow and workplace issues. They revise work assignments to meet anticipated and unanticipated needs, as necessary. They also review work in progress, or spot check work to ensure compliance with established procedures, methods, and deadlines. They monitor daily productivity and accuracy of staff ensuring turnaround times are met and backlogs are addressed. They keep management informed of performance issues, assignment changes, and task completion. They also provide guidance to employees on work-related activities, policies, procedures, and goals. The Lead MRT (ROI) develops trainings and provides resources pertaining to VHA and other Federal policies, guidelines, and regulations. They conduct training for all new release of information staff regarding the software, the process of requesting archived health records, and the use of VA computer applications. They act as a technical expert and provide consultation regarding HIPAA and the Privacy Act, as it pertains to release of information.

- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Ability to lead individuals, set priorities, and schedule work assignments.
 - (b) Ability to monitor and report on the status and progress of work, and make adjustments to accomplish the workload in accordance with established procedures.
 - (c) Skill in communicating with staff to ensure compliance with established policies, procedures, and regulations.
 - (d) Ability to provide or coordinate staff development and training.

h. Supervisory Medical Records Technician (ROI), GS-8

- (1) **Experience.** One year of creditable experience equivalent to the next lower grade level.
- (2) **Assignment.** For all assignments above the journey level, the higher-level duties must consist of significant scope, complexity (difficulty), range of variety, and be performed by the incumbent at least 25% of the time. This assignment performs supervision, administrative management, and direction of release of information staff, which includes GS-7 MRT (ROI-Legal), and lead MRT (ROI) positions. They have full supervisory responsibility, including preparing work assignments, monitoring the performance of release of information staff, evaluating employee performance, selecting staff, recommending awards and advancements, and taking disciplinary actions. The supervisory MRT(ROI) generates workload reports, distributes pending workload to staff, and monitors completion status. The employee ensures the timely release of health records in accordance with policies and procedures. They ensure compliance with accrediting agency and regulatory requirements and ensure corrective action is initiated, as needed. They work collaboratively with VA Regional Counsel to ensure health records related to malpractice, subpoenas, and tort cases are prepared and disclosed in a timely manner. The supervisory MRT (ROI) ensures orientation and competency assessments are conducted for all assigned staff. They develop policies and procedures, performance standards, and position descriptions, and/or functional statements. They are responsible for professional and administrative management of release of information staff. They maintain interdepartmental relations with other services to accomplish medical center goals.
- (3) **Demonstrated Knowledge, Skills, and Abilities.** In addition to the experience above, the candidate must demonstrate all of the following KSAs:
- (a) Ability to develop policy and provide workload analysis for release of information.
 - (b) Skill in interpersonal relations and conflict resolution.
 - (c) Ability to provide or coordinate staff development and training.

- (d) Ability to provide the full range of supervisory duties, to include responsibility for assignment of work to be performed, performance evaluation, selection of staff, recommendations of awards, advancements, and disciplinary actions.

6. DEVIATIONS.

- a. The appointing official may, under unusual circumstances, approve reasonable deviations to the grade determination requirements for MRT (ROI) in VHA whose composite record of accomplishments, performance, and qualifications, as well as current assignments, warrants such action based on demonstrated competence to meet the requirements of the proposed grade.
- b. The placement of individuals in grade levels or assignments not described in this standard must be approved by the Under Secretary for Health, or designee, in VHA Central Office.

Authority: 38 U.S.C. §§ 7402, 7403.]