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| Document Retention and Destruction | **Last Revision:** | March 2019 |
| **Last Reviewed** | March 2020 |
| **Applies to the following THA Group of Companies:** | * Island Hospice * Island Health Care * Independent Life at Home * RightHealth * Palliation Choices |
| **Included in the following THA Manuals:** | Administrative Policies & Procedures  Management of Information & HIPAA |

**PURPOSE**

To define the process for the systematic review, retention, and destruction of organizational documents and to ensure that the organization maintains appropriate records for their operations. Types of documents include paper, electronic, and voicemail.

#### POLICY

# Document Retention

The organization will retain documents in accordance with appropriate legal, regulatory, and accreditation standards and practices. The records will be retained in a safe, secure and accessible manner. Documents and financial files that are essential to the operations of the organization in an emergency situation will be duplicated or backed up on a routine basis.

Electronic mail that needs to be retained will be printed in hard copy and kept in an appropriate file and or downloaded to a computer file and saved . The departments will annually review active files and may send appropriate documents to storage. A log of all records in storage will be maintained. The types of documents included in this policy include:

* Corporate records
* Accounting and Corporate Tax Records
* Business Expense Records
* Bank Records
* Payroll and Employee Tax Records
* Employee Records
* Donor Records
* Legal Insurance and Safety Records
* Clinical Records

# Document Destruction

The organization is responsible for the ongoing process of identifying records which have met the required retention period and to oversee their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

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| **Keep 1 Years Min.** | **Keep 2 Years** | **Keep 3 Years** |
|  | * Correspondence (general) * Correspondence (with customers and vendors) * Duplicate deposit slips * Hiring Documents (selection documents, job applications, resume, job ads, screening tools/tests, interview notes and other records related to hire/no hire decisions) * Records related to promotions, demotions, transfers, performance appraisals, terminations, reasonable accommodations and/or requests, training records, incentive plans, merit systems, and seniority systems. | * Insurance Policies (expired) * Internal audit reports * I-9 Form (3 yrs after hire date or 1 year after separation, whichever is later) * FMLA documents * Training records for exposure prone employees * EEO Data Form * Exit Interview Form * Cobra Election Notice |
| **Keep 5 Years** | **Keep 6 Years** | **Keep 7 Years** |
| * OSHA forms 300, 301 * Minutes of Governing Body * Cost Reports | * Form 5500 (401k) * Medical/Benefits – 6 years after plan year | * Accounts payable ledgers and schedules * Contracts, mortgages, notes and leases (expired) * Expense Analyses/expense distribution schedules * Inventories of products, materials, and supplies * Invoices (to customers, from vendors) * Payroll records and summaries * Personnel files (7 years after termination) * Timesheets * Withholding tax statements * Client minor records after the age of majority reached |
| **Keep 10 Years** | **Keep tenure of employee + 30 Years** | **Keep Permanently** |
| * Bank Reconciliations * Bank Statements * Client Adult Records- after provision of service * Hospice Client Patient Records | * Employee exposure records on toxic substances and harmful physical agents * Employee medical records (including medical histories; examinations and test results;medical opinions and diagnoses; description of treatment and prescriptions; and employee complaints) | * Audit reports * Checks (for important payments and purchases) * Contracts (still in effect) * Correspondence (legal and important matters) * Deeds, mortgages, and bills of sale * Depreciation Schedules * Year End Financial Statements * Insurance records, current accident reports, claims, policies, etc. * Minute books, bylaws and charter * Patents and related papers * Retirement and pension records * Tax returns and worksheets * Trademark registrations and copyrights * Client records involved in litigation are retained until after settlement |

Exception Related to Litigation

# If records are relevant to anticipated, potential or actual litigation, the organization must preserve the records until it is determined that the records are no longer

# needed. This exception supersedes any previously or subsequently established destruction schedule for these records. Document destruction will be ceased immediately upon any indication of an official investigation or when a lawsuit is

# filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

# Compliance

Failure on the part of employees or contract staff to follow this policy can result in possible civil and criminal sanctions against the organization and its’ employees or contracted staff and possible corrective actions against the individual. The organization will periodically review these procedures to ensure that they are in compliance with new or revised regulations.

1. Labeling Boxes for Record Storage

Sometimes Contents and Details may seem like the same thing. The goal is to be able to look at the outside of the box and know what it contains when attempting to retrieve records.

General Labeling Rules:

* Use a BLACK permanent marker on the end of the box
* NEVER use the words “misc”, “miscellaneous”, or “old”
* Items not properly labeled will be returned for labeling
* Before using any abbreviations, make certain they will be universally understood in 10 years
* If the box contains employees or multiple random items (that you are tempted to call “misc”), prepare the list of names or files in the box and tape to *inside* top of the box IN ADDITION TO end of box labeling. (This DOES NOT apply to Patient files.)

