**18. Data Retention Policy**

Despite not being a requirement within HIPAA, Familyfirst understand and appreciates the importance of health data retention. Acting as a subcontractor, and at times a business associate, Familyfirst is not directly responsible for health and medical records retention as set forth by each state. Despite this, Familyfirst has created and implemented the following policy to make it easier for Familyfirst Customers to support data retention laws.

**18.1 State Medical Record Laws**

• [Listing of state requirements for medical record retention](http://www.healthit.gov/sites/default/files/appa7-1.pdf)

**18.2 Data Retention Policy**

• Current Familyfirst Customers have data stored by Familyfirst as a part of the Familyfirst Service.

• Once a Customer ceases to be a Customer, as defined below, the following steps are

i Customer is sent a notice via email of change of standing, and given the option to reinstate account.

ii If no response to notice in #1 above within 7 days, or if Customer responds they do not want to reinstate account, Customer is sent directions for how to download their data from Familyfirst and/or to have Familyfirst continue to store the data at a rate of $25/month for up to 100GB. If there is more than 100GB of data, Familyfirst will work with Customer to determine storage costs.

iii If Customer downloads data or does not respond to notices from Familyfirst within 30 days, Familyfirst removed data from Familyfirst systems and Customer is sent notice of removal of data.