

RECORDS RETENTION**OPS.018**

Approved By:	Chief Operations Officer	Adopted Date:	07/01/97
Distribution:	Administration, Billing Staff, Finance Staff, Medical Records, Corporate Services	Revision Date(s):	6/00, 4/03, 12/12

PURPOSE:

The purpose of this policy is to define the standards for retention of records at the Open Door Community Health Centers.

POLICY:

1. Management of records retention is the responsibility of the Compliance and Information Director.
2. All materials to be sent to storage shall be securely boxed, and clearly labeled with the following information.
 - item type(s)
 - initials of the individual responsible for boxing the records
 - date range of records
 - earliest date at which records can be destroyed
3. Storage files shall be purged annually. Items which are of a confidential nature shall be destroyed by shredding or incineration.
4. The retention schedule is as follows:

	Justification / Regulation	Retention
ADMINISTRATION Board Documents – Open Door Community Health Centers Records documenting actions of the Board of Directors, including meeting agendas, meeting minutes, and resolutions.		Life of corporation
ADMINISTRATION General Correspondence		10 years
ADMINISTRATION Documentation for Annual Data Reports Reports and documents used for preparation of UDS, OSHPD and other reports submitted to state and federal agencies.		7 years
ADMINISTRATION Grant Applications		Life of corporation
ADMINISTRATION Grant Applications – Funded RFP, Submitted Application, Funding Letter/Contract		Life of corporation
ADMINISTRATION Grant Applications – Funded Invoices, back-up, correspondence	Considered as Business Records	10 years
ADMINISTRATION Grant Applications – Not Funded		10 years

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	Justification / Regulation	Retention
ADMINISTRATION Insurance Records		Life of corporation
ADMINISTRATION Personnel Files – Terminated Employees Employment documents relating to individuals no longer employed by ODCHC.		7 years
ADMINISTRATION Unusual Occurrence, Problem and Accident Reports; Patient Complaints and Logs		7 years
BILLING Billing Documents – MediCal, CPSP, EPSDT, CMSP Billing documents for processing of MediCal and related claims, including encounter forms, claim forms, print-outs of electronic claims, EOBs, and remittance advices.	MediCal Provider Manual Vol. I, Prov Regs 1-2; California Title 22 Sections 51476 & 51502	3 years, plus any years still open to audit
BILLING Billing Documents – Other Programs Billing documents for processing of BCCCP, FamilyPACT, EAPC, HIV Testing and Counseling and other special programs, including encounter forms, claim forms, print-outs of electronic claims, EOBs, and remittance advices.	MediCal Provider Manual Vol. I, Prov Regs 1-2; California Title 22 Sections 51476 & 51502, Various Program Contracts	3 years, plus any years still open to audit
BILLING Billing Documents – Insurances Billing documents for processing private insurance claims, including encounter forms, claim forms, print-outs of electronic claims, and EOBs.		3 years, plus any years still open to audit
BILLING Billing Documents – Early Intervention Program, Ryan White CARE Billing documents for processing claims to EIP and CARE programs, including claim forms, invoices, grantor correspondence and other pertinent items.	Grant Contracts	5 years
BILLING Duplicate Copies of Patient Statements	Medicare	3 years

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	Justification / Regulation	Retention
BILLING Medicare Billing documents for processing claims to Medicare, including claim forms, invoices, grantor correspondence and other pertinent items.	FQHC Medicare Manual	5 years
CLINICAL Appointment Records / Daysheets Original records of appointment schedules, including patient names, dates, times and clinicians allocated for appointments.	MediCal Provider Manual Vol. I, Prov Regs 1-2; California Title 22 Sections 51476 & 51502	3 years, plus any years still open to audit
CLINICAL Medical & Dental Records – Adult Medical and dental records for patients aged 19 or older at the date of last visit.	California Title 22 Section 75055(a)	7 years
CLINICAL Medical & Dental Records – Minor Medical and dental records for patients under age 19 at the date of last visit.	California Title 22 Section 75055(a)	Until age 19, or 7 years, whichever is greater
CLINICAL Medical Records - Obstetrical Records of obstetrical care.	California Title 22 Section 75055(a)	19 years from date of delivery.
CLINICAL Medical Records – Custodial Records Medical records for patients will be kept in accordance with above ODCHC guidelines.		
FINANCE Payroll Summaries Records documenting payments for payroll including dates, employee names, withholding amounts and purpose, final check amount, and other related information.	26 CFR 31.6001-1; 301.6501(E)-1	10 years
FINANCE Payroll -Time Cards Records indicating time worked, including absences, vacation, sick leave, etc. Includes payroll tickets, time slips, and time edits.	29 CFR 405.9; 29 CFR 516	5 years

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FINANCE Banking Records Bank deposit records, summary reports, and workpapers. Bank reconciliation workpapers. Bank statements. Check registers. Cleared checks.	26 CFR 301.6501(E)-1	10 years
FINANCE General Ledger Workpapers Original documents and workpapers documenting transactions posted to the general ledger.	26 CFR 301.6501(E)-1	15 years
FINANCE Cost Reports Cost reports and appeals filed with HHS for Medicare/Medicaid cost reimbursement. Essential workpapers used to construct cost reports or appeals.	42 CFR 413.20; 42 CFR 413.24	15 years
FINANCE Fixed Assets Fixed asset inventory and depreciation schedules.	26 CFR 1.167(A)-11,12; 26 CFR 301.6501(E)-1	10 years
FINANCE Financial Summaries Accounting summary reports and journals that are for reference only and are not needed for documentation or verification of account transactions, including trial balances, profit and loss statements, and general ledger summaries.		3 years
FINANCE Tax Records		Life of corporation

For those records not listed above the default retention schedule is 10 years.

Approved:



Cheyenne Spetzler
Chief Operations Officer