

<b>SELFHELP COMMUNITY SERVICES, INC.</b>		<b>Policy #: 22</b>
CORPORATE COMPLIANCE POLICY AND PROCEDURE MANUAL		<b>Page 1 of 4</b>
<b>Subject:</b> Records Retention/Destruction	<b>Effective Date</b> January 2006	<b>Revision Date</b> March 2008, October 2014, August 2023
<b>Section:</b> Corporate Compliance		

**POLICY:**

Selfhelp Community Services Inc. maintains financial, personnel, administrative, clinical and guardianship records of clients in accordance with all regulatory requirements. These records are retained for periods prescribed by appropriate regulatory requirements and are disposed of after the expiration of the retention period only upon express approval of the division head.

"Records" refers to all forms and all media including handwritten, printed paper documents, electronic documents, video, audio, graphic presentations, network servers and document management systems.

**PROCEDURE:**

1. Financial Records: General ledgers, journals, copy of annual audited financial statements, audit reports, employee earnings and pensions, and corporate records including minutes books of the Board of Directors and its committees, articles of incorporation and bylaws, policies and procedures, tax exempt status documents and annual filings with IRS are retained permanently. All other financial records and information, unless longer retention is necessary for historical reference or to comply with contractual or legal requirements including examination of records in court litigation, are retained for seven (7) years.
2. Personnel Records, including INS I-9 forms, counseling records, and Conflict of Interest forms, if applicable, will be maintained for 7 years following the employee's

<sup>1</sup> Note: All Records Retention policies related to the Home Care CHHA and LHCSA programs are referenced in the department policies, at respectively CHHA Policy #: IMS-001, and LHCSA Policy #: OS-001.

resignation or retirement. Benefit plan and pension/profit sharing plan records are to be retained permanently.

3. Workers Compensation and disability records are maintained for 18 years beyond employee's termination date.
4. Hiring data (applications, resumes, test, job advertising and replies) relating to persons not hired will be retained for one year. Applications, resumes, tests, job advertising and replies relating to persons hired shall be retained during employment and 7 years thereafter.
5. Records maintained on behalf of the clients in accordance with Selfhelp's guardianship program will be maintained seven (7) years from the date the court issued an order discharging Selfhelp's duties and responsibilities as a guardian due to death of the client or for other reasons. The order settling the final account and the final discharge order should be retained indefinitely. Selfhelp should also retain important documents that evidence ownership of property to the extent that Selfhelp has not turned them over to the executor or the administrator of the client's estate.
6. Litigation-related documents will be retained for 7 years after termination of the matter, although some materials may be retained indefinitely if needed for regulatory or insurance purposes.
7. Insurance policies, applications and claims materials will be retained for 7 years after expiration of the policy or resolution of claims.
8. Information about Selfhelp benefactors (grantors, significant donors and contributors) is retained in the donor's database indefinitely. However, supporting documentation such as grant proposals, notice of grant award and other related documents are maintained for seven (7) years after the funds have been fully utilized.
9. Clinical Records:
  - A) Paper copies of clinical records will be maintained in Selfhelp's office and kept in locked, fire-resistant file cabinets when the office is closed.
  - B) Clinical records for discharged patients are retained in a separate, secure Discharge File for a period of six (6) years after discharge.

- C) In the case of minors, records will be kept for no less than six (6) years after discharge or seven (7) years after they reach majority (18 years), whichever is the longer period.
- D) Records involved in litigation are retained until after settlement and no less than six (6) years after discharge unless in the case of a minor.
- E) In the event that the Agency should cease to provide services and close, Selfhelp will maintain the clinical records securely for up to six (6) years. These records would be made available to future service providers pending a Release of Information form signed by Selfhelp patient or his legally designated representative.

10. Facilities Management will work with department leadership to document records to be stored or destroyed and Facilities Management will keep a log of the storage and destruction of such records.

11. Records and other documents or materials that are not expressly addressed herein may be destroyed at any time (upon authorization of the department leadership) provided that they have been retained for the periods prescribed for substantially similar records.

12. Storage of records:

Records are stored in the staff offices or in the department's storage area if the records are in active use for convenience or ready reference. Inactive records, for which use or reference has diminished sufficiently, are archived in a secured data and information warehouse. Appropriate records of the archived files are maintained and retrieval or movement of files is recorded.

13. Records Destruction:

- A) A date and appropriate number or label should appear on all boxes or document containers to keep records in context and to facilitate compliance with the records management program.
- B) Computers and hard drives that are repositories for many documents must never be sold, given away or discarded without first eliminating all business documents. The Vice President Technology and Informatics together with Facilities Management must approve all disposals of hard drives and used computers of any kind.

- C) All records, both electronic and hard copy, that have an expired retention period should be disposed of properly after the retention period with the express approval of the department/program manager, unless Organization management:
    - 1. Has approved an exception to preserve them for business need
    - 2. Has classified them for historical preservation
    - 3. Has identified them to litigation or governmental proceeding
  - D) Shredding is the preferred method of destruction of paper files. Burning or pulping as appropriate, are alternative methods of destruction for other than paper files.
  - E) Any clinical records in paper form are to be handled confidentially and shredded.
14. Records processed and maintained through a software as a service that are used as the program's systems of record, will be retained in accordance with Selfhelp record retention policy. However, destruction of any record by the computer service organization must be approved by a Vice President or their designee.
15. The computer service organization will provide an annual report from an individual or firm of independent accountants to Selfhelp in accordance with the requirements of Statement of Auditing Standards (SAS) No. 70 "Report on the Processing Transactions by Service Organization."
16. Documents relevant to any pending or active litigation must not be destroyed. A Legal Hold Order will be distributed by the CEO and/or Chief Operating Officer or their authorized representative to ensure that everyone who has records relating to pending or active litigation, or a government investigation, is aware of the matter. When the Legal Hold Order is lifted, the maintenance of records will be reverted back to their usual categories and may be destroyed according to their corresponding retention period.
17. An annual records review must be done by all employees who maintain Organization records. This annual review program will be coordinated between Facilities Management and all Selfhelp's programs, business units, or sub-agency to ensure proper records retention and destruction of records in all forms and media. This review is also designated to educate employees and help them perform a self-assessment of the records under their control.