



SAMPLE RECORDS RETENTION POLICY AND PROCEDURE

FUNCTION
RECORDS
RETENTION
MANUAL

NUMBER

PRIOR ISSUE

EFFECTIVE DATE
DRAFT

Page 1 of 3

Purpose

To provide guidance for ABC Nursing Home Company (the “ABC Nursing Home Company”) centers and for Corporate Headquarters Functional Areas in the creation, use and disposition of Records.

Introduction

Records management is the establishment of a systematic procedure for control of records that must be maintained and the disposition of records. This Record Retention Policy is the result of cross-functional collaboration of the ABC Nursing Home Company’s Corporate Headquarters functional areas. It applies to all functional areas at the Corporate Headquarters and to all centers in the field and affects official ABC Nursing Home Company documents.

Official documents shall be defined as any records residing in paper, film, or electronic format that are created by a center or Corporate Headquarters functional area as a record of business activity.

Policy

Each Corporate Headquarters functional area or each center will provide its own records management in accordance with the company’s record retention schedules.

Procedure

The Corporate Headquarters has identified six areas that must be addressed when planning and implementing a records management program. These are outlined below:

1. Creation of an official records inventory.
 - A. An inventory of all official documents will be completed by all ABC Nursing Home Company centers and Corporate Headquarters functional areas and will be updated periodically. Record Retention Schedules are included in the Record Retention Manual. Each Corporate Headquarters functional area or center department should maintain an up-to-date record inventory, adding records and deleting records as necessary. In many instances centers may choose to use these Records Retention Schedules as a basis for the center specific inventory. Use the Document Retention Survey form to complete the inventories.
 - B. All information on the records inventory form will be completed to the extent known.
 - 1) The ultimate disposition of records depends upon the purpose that any given record may have. These purposes can be classified into four major types:
 - (a) Administrative – defined as records that are required for management of the center or ABC Nursing Home Company.
 - (b) Legal – defined as documents required by law.
 - (c) Fiscal – defined as records relating to financial matters.
 - (d) Historical – defined as documents that may have historical significance.
2. Assignment of responsibilities for Record Retention.
 - A. The functional area or center department responsible for record retention is often determined when the Document Retention Survey sheet is prepared. Normally, the responsible record keeper is the

Corporate Headquarters functional area or center department that maintains a document as a primary record. This document is normally the original, but in certain instances this is not the case.

- B. An inventory review of all retained records should be conducted periodically by an employee of the applicable Corporate Headquarters functional area or center department.
- C. The Record Retention Manual schedules will provide guidance for the retention periods for records. Documents that have exceeded their retention period will be destroyed. Acceptable methods for discarded or disposal of materials will be used (e.g. contracted shredding company, electronic destruction, etc.).
- D. Unless otherwise instructed, each applicable Corporate Headquarters functional area or center department will determine in what format documents should be stored and is responsible for appropriate long-term storage or destruction.
- E. A system of storage for electronic records will be established and maintained by Information Systems and Technology.

3. Accountability of legal requirements for records management.

- A. It is suggested that official inventories be broken down in the following departments or a similarly appropriate classification.

1) Record department may be defined as: *(insert corporate-specific classes)*

Corporate	Facility
Accounts Payable	Activities
Accounts Receivable	Administration
Clinical Services	Admissions
Compliance	Business Office
Finance	Clinical/Nursing
Human Resources/ Employee Relations	Dietary
Legal	Housekeeping/Environmental Services
Payroll	Human Resources/Payroll
Real Estate/Development	Maintenance
Rehabilitation Services	Medical Records
Reimbursement	Rehabilitation Services
Risk Management	Social Services
Sales Marketing	
Tax	

- B. Research may be needed by the applicable Corporate Headquarters functional area or the center for its state specific requirements on each document in order to determine which local, state, or federal regulations apply to each record.
- C. If there are no laws governing the retention of a record, the functional department shall decide the retention period with legal approval.
- D. In cases where retention intervals are known to be greater or lesser than the ones stated, use the greater time span.

4. Elimination of unnecessary duplication of records.

Control of unnecessary duplication of records may be accomplished by retaining only one copy of each document in its appropriate main file. This copy may be electronic, film or paper, depending on legal

requirements. All other copies should be destroyed when activity has ceased and there is no further need for duplicate copies. In some cases, Corporate Headquarters functional areas or centers may decide to retain duplicate records for a short period of time after the activity has ceased. This determination should be made on an individual basis by the department involved.

5. Establish procedures for records disposition.

- A. No record listed on the retention schedules may be destroyed until authorization has been obtained from the appropriate corporate party.
- B. All records should be destroyed following approved destruction methods. If the volume of required shredding exceeds the center's capacity to fulfill this task in-house it is recommended that arrangements be made with a contracted shredding company. The Corporate Headquarters Purchasing Department can assist in locating a contract Shredding Company.
- C. Records in high risk of litigation or in litigation will not be scheduled for disposition per direction of legal counsel. However, in some cases, such retention may be permanent. Refer to record retention schedules.

To assist in determining how long documents should be retained, the Record Retention Manual will list many of the documents that pertain to the ABC Nursing Home Company. If the document is not an official document held by the applicable functional area or department, in most instances the document can be destroyed when the ABC Nursing Home Company has completed its fiscal year.

As Corporate Headquarters functional areas and centers prepare their Record Retention Inventory lists, new records may be added to the Record Retention Guidelines.

This document is presented as a model only by way of illustration. It has not been reviewed by counsel. Before applying to a specific use in your organization it should be reviewed by counsel knowledgeable concerning federal and state laws.

