Documentation and Retention of Records

APPLICABILITY:

This policy applies to the following entities (collectively referred to as "UNC Health Care System" or "UNCHCS" in this policy):

- UNC Health Care System/UNC Medical Center*
- UNC Physicians Network
- UNC Physicians Network Group Practices
- Rex Healthcare / Rex Hospital
- Chatham Hospital
- Caldwell Memorial Hospital
- UNC Rockingham Health Care / UNC Rockingham Hospital
- Johnston Health
- Lenoir Memorial Hospital
- Margaret R. Pardee Memorial Hospital
- Nash Healthcare System / Nash Hospitals
- Wayne UNC Health Care

*UNC Medical Center includes all UNC Hospitals' facilities and the clinical patient care programs of the School of Medicine UNC-Chapel Hill (including UNC faculty physicians).

I. Description

UNCHCS and its Members shall document and retain certain documents associated with the UNCHCS privacy program and related activities as required by law. This policy shall be followed in conjunction with UNCHCS' other policies regarding retention of records.

Included within the scope of this policy are the patient care programs of the UNC School of Medicine (UNC SOM). As a result, this policy shall apply to all UNC SOM personnel, including but not limited to faculty, staff, students, trainees, interns and volunteers who may be full-time, part-time, paid or unpaid who create, store, transmit, access or use any patient information in support of clinical purposes for UNCHCS or any other healthcare entity.

II. Policy

A. Format of Documents to be Retained. UNCHCS shall maintain in written or electronic format all privacy
policies and procedures.

B. **Requirement.** If an action, activity, designation or communication is required by the UNCHCS privacy policies to be in writing, UNCHCS (or the appropriate UNCHCS Facility as applicable) shall maintain such writing, or an electronic copy, as documentation.

C. **Retention Period.** UNCHCS (and UNCHCS Facilities as applicable) will retain any documentation required by the UNCHCS HIPAA policies for a period of at least six (6) years from the date of its creation, or the date when it was last in effect, whichever is later.

### III. Definitions

None

### IV. References

45 C.F.R. § 164.530(j)

### V. Related Policies/Forms

UNCHCS Policy, "Retention of Designated Record Set, Legal Health Record, and Financial Records"

### Attachments:

No Attachments

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<td><strong>Step Description</strong></td>
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<td>Jerylyn Williams: VP Chief Audit &amp; Comp Officer</td>
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<td>SYSTEM Site Administrator</td>
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### Applicability

Caldwell Memorial Hospital, Chatham Hospital, Johnston Health, Nash Health Care, UNC Health Care System, UNC Lenoir Health Care, UNC Medical Center, UNC Physicians Network, UNC Rex Healthcare, UNC Rockingham Health Care, Wayne Memorial Hospital