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Owner: *David Behinfar: HCS Exec Dir Privacy*
Policy Area: *HIPAA - Privacy*
Policy Tag Groups:
Applicability: *UNC Health Care System (all owned and managed entities)*

Documentation and Retention of Privacy Program Records

APPLICABILITY:

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

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

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

I. Description

UNC Health and its Members shall document and retain certain documents associated with the UNC Health privacy program and related activities as required by law. This policy shall be followed in conjunction with UNC Health's 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 UNC Health or any other healthcare entity.

II. Policy

- A. **Format of Documents to be Retained.** UNC Health 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 UNC Health privacy policies to be in writing, UNC Health (or the appropriate UNC Health Facility as applicable) shall maintain such writing, or an electronic copy, as documentation.
- C. **Retention Period.** UNC Health (and UNC Health Facilities as applicable) will retain any documentation required by the UNC Health 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

UNC Health Policy, "[Retention of Designated Record Set, Legal Health Record, and Financial Records](#)"

Attachments

No Attachments

Approval Signatures

Step Description	Approver	Date
	Jerylyn Williams: Chief Audit & Compliance Ofcr	06/2020
SYSTEM Site Administrator	Emilie Hendee: HCS Attorney Sr	06/2020
	David Behinfar: HCS Exec Dir Privacy	06/2020

Applicability

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