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

<table>
<thead>
<tr>
<th>Step Description</th>
<th>Approver</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Jerylyn Williams: Chief Audit &amp; Compliance Ofcr</td>
<td>06/2020</td>
</tr>
<tr>
<td>SYSTEM Site Administrator</td>
<td>Emilie Hendee: HCS Attorney Sr</td>
<td>06/2020</td>
</tr>
<tr>
<td></td>
<td>David Behinfar: HCS Exec Dir Privacy</td>
<td>06/2020</td>
</tr>
</tbody>
</table>

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