

**NORTH COUNTRY HEALTH CONSORTIUM, INC.**  
**POLICY GOVERNING**  
**DOCUMENT RETENTION AND DESTRUCTION**

The North Country Health Consortium [the Consortium] adopts the following Policy in order to strengthen its existing policies and procedures, maintain and exemplify "best practices," and comply with applicable law and regulations.

**PRINCIPLES:**

1. The members of the Consortium Board, staff and volunteers must be aware that it is a crime to destroy, alter, cover up, or falsify any document<sup>1</sup> (or persuade anyone else to do so) to prevent its use in an official proceeding (for example, litigation or administrative proceeding, governmental investigation, or bankruptcy proceeding).
2. If an official investigation is underway or even suspected, management of the Consortium must stop any document purging in order to avoid criminal obstruction charges.
3. Similarly, if litigation is reasonably anticipated, document purging must be stopped.
4. The Consortium will adopt and maintain a written, mandatory document retention and destruction policy to help limit accidental or innocent document destruction.
5. The Consortium will monitor, justify, and carefully administer the document destruction process.
6. The Consortium will maintain appropriate records about its operations, and will also regularly dispose of unnecessary and outdated documents in accordance with the Policy.
7. The Consortium will manage, store, preserve and archive documents, including e-mail and other electronic messages or data, in accordance with the Policy.
8. The Consortium Corporate Compliance Officer will report on adherence to this policy to the Consortium Board of Directors which has responsibility for oversight of compliance with this Policy.

**POLICY:**

Sensitivity to the confidential and personal information regarding existing and prospective customers, members, and patients is the basic value that governs these guidelines that stress accuracy, confidentiality, security, and proper archiving or destruction for the North Country Health Consortium's records.

**Paper and Electronic Files**

1. The Consortium maintains both paper and electronic files, and is responsible to ensure the basic values of accuracy, confidentiality, security and proper archiving as well as ensuring proper document destruction once documents have served their purpose.
2. The Consortium keeps financial reports and sensitive customer, member and patient records secured in locked cabinets or in the Consortium Office.
3. Only Directors and Consortium Staff have access to Consortium paper and electronic files. For purposes of this document, "staff" includes outside consultants that have signed confidentiality agreements with the Consortium.

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<sup>1</sup> "Document" includes e-mail, voicemail and other electronic messages or data.

4. All electronic computer files are protected by password. All Consortium staff will use password protected screen savers.
5. Consortium staff members will not allow work study students or volunteers to use their desks or work areas unsupervised.
6. Consortium voicemail and email files will be protected, maintained and destroyed according to existing Consortium policy and/or procedure.
7. The Consortium abides by all state and federal guidelines in regards to storing and maintaining patient dental records. All dental records are in electronic format.
8. The Consortium maintains patient dental records for at least 10 (ten) years from the time the clinician last treated the patient. In the case of a minor patient, the Consortium maintains the patient's dental record for at least 10 (ten) years past the age of majority.
9. The Consortium protects Consortium records by providing regular computer system checks for reliability and protection against viruses in the ordinary course of maintaining the Consortium's records.

#### **File Access**

Only Consortium staff, the Board of Directors and the independent accountants retained to audit the Consortium's financial statements shall have access to financial files and records of the Consortium; other persons may be granted access to financial files upon permission of the Executive Director or Consortium President.

Only authorized clinic and management staff have access to patient dental records. All electronic computer files are protected by password. All clinic staff will use password protected screen savers.

Under an agreement with the State of New Hampshire, Department of Health and Human Services, the Consortium keeps such records as are necessary to fully disclose the extent of the care or services provided to dental patients served under the NH Title XIX Program and to furnish the Department with such information regarding any payment claimed, as requested.

Dental patients have the right to see, review, inspect, request, and obtain a copy of their dental record, including x-rays. A signed release is used to release a copy of the record to either the patient or patient representative.

#### **Backup**

Consortium electronic document files are backed up daily to prevent catastrophic file loss.

Consortium dental record database files are backed up on a weekly basis due to the mobile nature of the program.

#### **Retention Cycle**

1. The Consortium keeps permanent files in the Consortium Office of the following:
  - a. End-of-fiscal-year reports and financial statements
  - b. Annual Reports (audited)
  - c. Auditors' management letters
  - d. Minutes of Board meetings

- e. Minutes of Member meetings
  - f. Corporate Governance Policies
  - g. Office Policy and Procedures Manual
  - h. Submitted IRS forms (e.g., W-2, W-3, 1099, 990, 1065)
  - i. All legal documents
  - j. All correspondence with legal and financial counsel
  - k. Funded grant requests
2. The Consortium retains, in the Consortium Office, monthly account statements for 10 (ten) years. At the end of this time, these documents are destroyed in accordance with this Policy.
  3. The Consortium maintains patient dental records for at least 10 (ten) years from the time the clinician last treated the patient. In the case of a minor patient, the Consortium maintains the patient's dental record for at least 10 (ten) years past the age of majority.

### **Students and Other Temporary Employees**

1. All temporary Consortium employees, including volunteers and third party consultants, must sign a confidentiality agreement prior to being allowed access to Consortium Office files.

### **Archives**

1. Consortium records no longer needed for current operations but deemed to be of historic value are stored within the Consortium's Office.
2. Consortium patient dental records are stored in a secure electronic format within the Consortium's office.

### **Document Destruction**

1. All Consortium paper documents that are neither necessary for current operations nor designated for archiving must be destroyed. Such destruction will be conducted under the direction of the Executive Director of the Consortium and/or the Corporate Compliance Officer.

### **Suspension of Policy – Litigation Hold**

If the Consortium becomes aware of litigation or the threat of litigation against the Consortium or any officer or director thereof for acts or omissions during term of service, all usual document and record destruction shall be suspended immediately. The Consortium should then promptly consult with counsel so that the Consortium can assess the scope of documents and records that must continue to be retained by the Consortium to ensure compliance with applicable law.

Adopted by Board of Directors: 8/27/10  
Date