



Subject:	Retention of Records
Endorsed By:	Compliance Committee
Approved By:	Compliance Committee, Board of Managers
DSRIP Implementation Deadline:	April 2015
Effective Date:	October 2015
Supersedes:	April 2015
Purpose:	It is the goal of SI-PPS to ensure that all documents related to compliance, the DSRIP Program, business and medical records (the “Documents”) are maintained in a manner consistent with SI PPS’ Compliance Program and all applicable federal, -state and local regulations and guidelines as related to document retention.
Policy:	It is the Policy of SI-PPS to maintain, preserve, and protect against inadvertent and/or purposeful destruction, loss, unauthorized access, corruption, damage or unauthorized reproduction of all Documents. SI-PPS expects all PPS Associates to comply with this Document Retention Policy.
Procedure:	<ol style="list-style-type: none">1. SI-PPS will have a system of controls to ensure proper maintenance, retention and destruction of records.2. PPS Associates shall not destroy or discard any records known to be the focus of a pending investigation or subject to a pending request.

3. PPS Associates shall contact their Compliance Officer or the SI-PPS Compliance Officer in the event of a potential violation or a question as to whether a record may be destroyed.
4. All PPS Associates shall keep accurate, timely, and complete records, reports, communications and other medical and business information and documentation relating to any activity, claims submission, arrangements or transactions relating to the operations of SI-PPS or the DSRIP Program.
5. If documentation is incomplete, contradictory, or inaccurate, that documentation will not be used to report data and metrics under the DSRIP program.
6. In providing reports on data and metrics, PPS Associates will correctly enter data and ensure that reported data is accurate and truthful. SI- PPS will not tolerate any PPS Associates engaging in any improper reporting practice. No false or artificial entries shall be made for any purpose.
7. All reports submitted to governmental agencies, insurance carries, or other entities will be accurately and honestly made. Deliberate or reckless misstatements to government agencies are prohibited. PPS Associates are encouraged to direct questions regarding records to their compliance officer.
8. Records will only be distributed to either (1) authorized personnel on a need-to-know basis; or (2) legally authorized individuals and in strict conformance with applicable federal, State, and local laws and regulations.
9. Whenever authorized government agency personnel (with appropriate identification) request access to any SI-PPS or DSRIP program information, legal counsel and/or SI-PPS Compliance Officer shall be notified immediately, prior to granting access to the requested information
10. Medical record amendments and addendums shall be consistent with and compliant with federal, state and/or local laws, rules and regulations.
11. Records created in conjunction with the Compliance Program, including billing and other records created in the ordinary course of business will be

preserved and maintained for ten (10) years from the fiscal year in which the record is created or ten (10) years from the date that a final determination is made by the payor (payment or appeal exhaustion) if applicable, WHICHEVER IS LATER to comply with the Federal False Claims Act or any other applicable law, rule or regulation. These records include any letter to or from the government, and documented compliance efforts and implementation processes to confirm the effectiveness of the program.

12. Records will be stored:

- a. in an appropriate location taking into consideration confidentiality laws and regulations; and
- b. in a manner that to the extent possible takes into consideration environmental elements known to compromise or deteriorate documents, such as water and fire.

13. Retrieval and access to medical records will be in accordance with SI-PPS' HIPAA program and policies and procedures, and applicable laws and regulations. Only persons with appropriate authorization to access such records shall be permitted to view, copy or remove such records.

14. Records will be destroyed in accordance with applicable laws and regulations. Records shall not be thrown into a trashcan or into any receptacle that is part of the public waste removal system.

15. Record destruction will be suspended immediately upon any indication of an administrative, civil or criminal investigation or court proceeding involving a particular record or document. Upon learning of such investigation or proceeding, the SI-PPS Compliance Officer or legal counsel shall notify all PPS Associates to preserve, and cease and avoid any destruction of, all documents and records, both hard copy and electronic, pertaining to that matter or subject. Destruction will be reinstated upon conclusion of the investigation or proceeding.

Scope:

SI- PPS, SI-PPS Associates (PPS Associates shall mean all individuals and entities that participate in or do business with SI-PPS, including but not

	limited to its employees, independent contractors, vendors, agents, suppliers, executives and governing body members).
Project(s):	
Regulatory Alignment:	
Reference(s):	
Attachment(s):	none

Reviewed/Revised by: Regina Bergren April 2016

Approved by Compliance Committee: August 2016

Partner Organization	Responsible Staff Name & Title	Date Reviewed	Signature