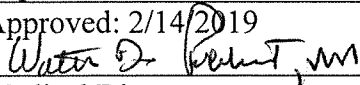


Index Section:	Corporate Compliance (CC)	Effective: 2/14/2019
Policy:	(CC 1.5) Business Record Retention	Replaces or Modifies:
	Primary Responsibility: Compliance Officer, Site Managers, Directors	Approved: 2/14/2019  Medical Director

BACKGROUND: This Records Retention Policy addresses the retention, and destruction of Galen Medical Group's electronic and paper business records. Attached to this Policy is Galen's official Records Retention Schedule that identifies the broad range of records and categories of records created by and/or retained by Galen Medical Group and its contractors.

PURPOSE: to ensure that Galen records are created, retained and destroyed in accordance with all applicable federal and state laws, ordinances and regulations; to ensure that records relevant to any on-going or anticipated litigation, audits, or governmental investigations are properly preserved in order to protect the interests of Galen Medical Group.

POLICY:

Each specific category of records shall be preserved for the period indicated.

Employment Records:

- A. Employee Agreements: Permanently
- B. Payroll Time Cards: 4 years
- C. Employment Applications: 3 years
- D. Health and Benefit Beneficiary Forms: Termination plus 3 years
- E. Medical, Dental/Vision Plan Elections: Termination plus 3 years
- F. Drug Test Results: Termination plus 3 years
- G. Education Assistance Program Records: Completion of program + 3 years
- H. FMLA Leave Reports: Termination + 3 yrs.
- I. USERRA Leave Records: Permanent
- J. Job Related Injuries & Illnesses Records: Termination + 5 yrs.
- K. Reasonable Accommodation Records: Termination + 3 yrs.

Pre-Employment/Employment Documents

- A. Job Description: Termination + 3 yrs.
- B. Position Requisition: Termination + 3 yrs.
- C. Recruitment Notice/Job Ads: Termination + 3 yrs.
- D. Employment Application/Resume: Termination + 3 yrs.
- E. Interview Evaluation: Termination + 3 yrs.
- F. Assessment Results: Termination + 3 yrs.
- G. Background Check Information: Termination + 3 yrs.
- H. References/Verifications: Termination + 3 yrs.

- I. New-Hire Action Form: Termination + 3 yrs.
- J. Offer Letter: Termination + 3 yrs.
- K. Form I-9: Termination + 3 yrs.
- L. EEO Data Form: Termination + 3 yrs.
- M. Employee Policy Acknowledgements: Termination + 3 yrs.
- N. Conflict of Interest Statement: Termination + 3 yrs.
- O. Intellectual Property Ownership/Nondisclosure: Termination + 5 yrs.
- P. Employee Change Action Documents: Termination + 3 yrs.
- Q. Disciplinary Records: Termination + 3 yrs.
- R. Employee Development Records: Termination + 3 yrs.
- S. Position/Pay History Records: Termination + 3 yrs.
- T. Employee Performance Reviews: Termination + 3 yrs.
- U. Relocation Agreement: Termination + 3 yrs.
- V. Resignation Letter: Termination + 3 yrs.
- W. Termination Action Form: Termination + 3 yrs.
- X. COBRA Election Notice: Termination + 3 yrs.
- Y. Separation Agreement: Termination + 5 yrs.
- Z. Exit Interview Form: Termination + 3 yrs.
- AA. Unemployment Claim Records: Termination + 4 yrs.

* Note: If an applicant is ultimately not hired, the above records should be retained for three (3) years after the no-hire decision is made.

Retirement

- A. 401(k) Allocation Records: Termination + 4 yrs.
- B. 401(k) Loan Payment Forms: Termination + 3 yrs.
- C. Pension Eligibility Records: Termination + 50 yrs.
- D. Request for Calculation: Termination + 4 yrs.
- E. Retirement Beneficiary Form: Termination + 50 yrs.

Payroll/Tax

- A. Paychecks/stubs, W-2s, W-4s: 4 yrs.
- B. Earnings Register: 4 yrs.
- C. Employee Withholding: 4 yrs.
- D. Expense Reports: 3 yrs.
- E. Federal & State Payroll Tax Forms: 4 yrs.
- F. Federal Forms 1099: 4 yrs.
- G. Time Sheets/Cards: 4 yrs.

Other Payroll Records

- A. Loan Agreements: Termination + 5 yrs.
- B. Direct Deposit Records: Termination + 4 yrs.
- C. Garnishment Records: Termination + 4 yrs.
- D. Final Payroll Deduction Checklist: Termination + 4 yrs.

HR Policies & Reports

- A. EEO-1 Reports: Permanent.
- B. HR Policies: While current + 3 yrs.
- C. State New-Hire Reports: 3 yrs.
- D. Affirmative Action Plans/Records: 5 yrs.
- E. Form 5500: 6 yrs.
- F. VETS-4212 Reports: 5 yrs.
- G. Galen Compliance Hotline Reports: 6 yrs.

OSHA Records:

- A. Bloodborne Pathogens: 3 years for training documents.
- B. Exposure Incidents: At least duration of employment plus 30 years for employee exposures and medical records.
- C. Hazardous Communications (chemicals) training records: Duration of employment plus 5 years.
- D. Sharps Injury Logs: 5 years (if not an Exposure Incident).
- E. OSHA 300/300A: Posting date + 5 yrs.

CLIA Records:

- A. 2 years for most records'
- B. 10 years for pathology reports generated by testing facility'

HIPAA Records:

- A. 6 years from creation or last effective date, except as noted in Galen's Medical Records Retention Policy.

Meaningful Use Records:

- A. Meaningful use records must be kept 6 years from reporting date.

Financial Records:

- A. Capital Stock ledgers: Permanently.
- B. Corporate minute books: Permanently.
- C. Deeds/Titles: Permanently.
- D. Abstracts and other papers pertaining to sale of real estate: Permanently.

- E. General Ledgers: Permanently.
- F. Financial Statements: Permanently.
- G. Books of original entry (i.e. cash receipts and disbursements including general journal entries): Permanently.
- H. Tax Returns: Permanently.
- I. IRS Audit Reports: Permanently.
- J. Contracts: 7 years after expiration.
- K. Accounts receivable ledgers (patient accounts): 7 years.
- L. Royalty statements or computations: 7 years.
- M. Bank statements and cancelled checks: 7 years.
- N. Accounts Payable Files (purchase order, packing slips, invoices, statements): 7 years.
- O. Charge tickets (encounter forms or super bills): 7 years.
- P. Explanation of Benefits: 7 years.
- Q. Appointment records: 7 years.

Retention and Deletion of Email

- A. Galen's email system is intended to be used for communication purposes and should not be used as an official records filing system. Galen restricts the size of employees' and contractors' email boxes, and Galen employees and contractors are discouraged from routinely saving all email. As a general rule, email communications that are not subject to a Legal Hold, and that are not required to be kept as part of an official record under this Policy and the Records Retention Schedule, should be deleted. All Galen employees and contractors are required to review their email regularly and to delete email that does not meet one of these requirements.
- B. In the event of a threatened or pending lawsuit, audit, investigation, or government inquiry, the same Legal Hold rules apply to email that apply to paper records.

Email Retained as a Business Record:

- A. Email messages retained as official records or supporting records should be filed as separate records and retained by the employee or contractor maintaining them in compliance with the Records Retention Schedule. As much as possible, they should be kept electronically, secure from deletion, during their retention period.

Legal Holds

- A. When Galen becomes aware of the need to preserve records due to a lawsuit, audit, investigation, or other inquiry, the Compliance Officer will send out notice to the affected department/s. A Legal Hold notice suspends all requirements of the Records Retention Schedule that might otherwise apply to the records on hold. Once a Legal Hold is in effect, none of the affected records, including drafts and duplicates, may be altered or destroyed until the department receives notification from the Compliance Officer.

- B. If a Galen employee or contractor becomes aware of the likelihood of an audit, inquiry, investigation or lawsuit, Galen has not been formally notified or served and no Legal Hold has been issued for the relevant documents, the employee or contractor must notify his/her manager, who should notify the Compliance Officer that a Legal Hold must be issued.
- C. Records subject to a Legal Hold must be retained for the period during which the Legal Hold is implemented, or for the period specified in the Records Retention Schedule, whichever is longer.