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Records Retention and Destruction Policy	
Developed By: Record Retention Committee	Effective Date: 12/5/2019
Policy Owner: Record Retention Committee	Approved by: Douglas Brown, President, UMMH & CAO/CLO, UMMHC
Applicability: UMMHC Workforce Members	
Approved by: Eric Dickson MD, CEO UMass Memorial Health Care	
Keywords: Record, Retention	

Policy

This policy addresses the retention and destruction of UMass Memorial Health Care (UMMHC's) Records as defined in this policy. The retention periods set forth in the attached [Records Retention Schedule](#) are the minimum retention periods required by UMMHC. At the conclusion of the retention period, the Records should be properly destroyed.

UMMHC will retain and destroy UMMHC Records as described below.

- Retention:
 - UMMHC Records must be retained by the UMMHC Record Owner for the retention period specified in the attached [Records Retention Schedule](#).
 - The attached [Records Retention Schedule](#) lists different types of Records and the length of time those Records must be retained. Questions regarding the retention period for a specific document or class of documents should be addressed to the Office of General Counsel, your entity's compliance officer or the Internal Audit office.
 - Requests to change or update Records Retention Schedules should be made in writing and sent via e-mail to RecordRetentionUMMHC@umassmemorial.org.
 - All Records subject to a legal hold pursuant to the Litigation/Investigation Document Hold Policy **may not be destroyed and must be retained** until the release of the hold is approved by the Office of the General Counsel or by an outside counsel engaged by either the Office of the General Counsel or the Office of Claims Management.
 - UMMHC Records that contain confidential and proprietary information in nature must be secured, controlled, and protected to prevent unauthorized access in accordance with UMMHC Privacy and Information Security policies and procedures.
 - UMMHC Records are the property of UMMHC and therefore no UMMHC Workforce Member has the right to access such Records except as required to perform their job duties, or to personally retain a copy of Records unless otherwise approved even if they may have developed or compiled them.
 - UMMHC Workforce Members may not falsify or inappropriately alter information in any UMMHC Record.

- Destruction:
 - If the Record retention period has expired, the Record should be destroyed.
 - No medical record should be destroyed without written approval from the AVP of Health Information Management (HIM).
 - Records will be destroyed in a manner that does not allow for the information to be retrievable, recognizable, reconstructed or practically read.
 - If the [Records Retention Schedule](#) specifies that a regulatory or other notice must be provided prior to destruction, destruction may not occur until regulatory requirements have been met.
 - The unauthorized destruction or removal of UMMHC Records is strictly prohibited.

- Storage
 - All records archived after the effective date of this policy must be indexed and labeled with the UMMHC Record Owner, type of Record, Record description, and date when the record can be destroyed.
 - Storage areas for inactive archived paper records can include an area inside the facility that has been approved by the Office of the General Counsel, your entity's compliance officer or the Internal Audit office for records storage use, or an off-site, private, professional record storage facility with which UMMHC has an active contract for storage or retrieval services. NOTE: Garages, basements, homes, trailers, storage warehouses, or mini-storage facilities are not acceptable for storage of inactive archived paper records.
 - Electronic archived records should be retained for the period defined within the [Records Retention Schedule](#) and securely destroyed by UMMHC or at UMMHC's direction by the vendor of the electronic archive when all conditions required for destruction have been met.

Definitions

A **UMMHC Record** is defined as follows:

- Any document generated and/or received relating to providing patient care or transacting UMMHC business that records a business decision or outcome (such as an approval or report), sets policy, establishes guidelines or procedures, is a contract, is an attestation, records property transactions, relates to tax, insurance and financial reporting, records completion of a required task, is regulatorily required information, certifies a transaction, becomes a receipt, relates to an individual's employment and performance, or is part of the official medical record. A document is a Record based on its content, not based on its format. As a result, Records may be in paper, electronic, or any other format. Specific format examples include, but are not limited to, papers, letters, e-mails, medical records, x-rays, cards, books, maps, photographs, blueprints, sound or video recordings, microfilm, magnetic tape, electronic media, web files, and other information recording media, regardless of physical form or characteristic.

The following are **not** considered Records for the purpose of this policy.

- Documents that are not included in the definition of a Record above, including, but not limited to informal or short-term communication with short-lived or no administrative value, informal meeting notes, copies of Records used for short-term purposes, voicemail, self-sticking notes, and telephone messages, unless the documents are subject to a subpoena, warrant, or government investigation.

UMMHC Record Owner – the individual or department designated as the official keeper of a Record. This designation is made within this policy's accompanying [Records Retention Schedule](#). Other individuals may have copies of Records, but the Record holder must retain the Record for the time required under this policy or under a litigation hold.

Workforce Member – All employees, contractors, volunteers, trainees (including medical students,

interns, residents, allied health professional and business students), members of the medical staff including employed and private physicians, nurses in expanded roles, physician assistants, temporary employees, and other persons employed, credentialed or under the control of UMMHC whether or not they are paid by UMMHC.

Required Criteria for Procedures

N/A

Entity/Department Specific Procedures

[Record Retention Schedule](#)

Supplemental Materials

N/A

Rescission

This policy supersedes the following existing entity policies.

Marlborough Hospital:

- HR-44 Payroll Record Retention
- HR-20 Personnel Records

UMMMC:

- Policy 4087: Payroll Record Retention

UMMHC:

- HIM 1016: Medical Record Retention and Destruction
- MM 1050: Materials Management Record Retention Policy
- 2351 – Finance Record Retention Policy

CNEHA-Clinton:

- HA-60-58 Human Resources Record Keeping Guidelines
- HA-5742-098: Film and Digital Image Retention

UMMMG:

- Policy 4087: Payroll Record Retention

CHL:

- Medical Record Retention 6-22-6

References

N/A