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North Sound Behavioral Health Administrative Services Organization, LLC

Section 1000 - Administrative: Records Retention

Authorizing Source: RCW 40.14.070; WAC 44-14-03005 or 2 CFR 200.333

Approved by: Executive Director Date: 09/15/2020 Signature:

POLICY # 1025.00

SUBJECT: RECORDS RETENTION

POLICY

All hard copy Records, Documents, Protected Health Information (PHI), Board Minutes and other supporting evidence to satisfy contract negotiation, administration and audit requirements will be retained according to North Sound BH-ASO's record retention schedule, or as instructed by the Revised Code of Washington (RCW) 40.14.070, Washington Administrative Code (WAC) WAC 44-14-03005, or Code of Federal Regulations (CFR) 2 CFR 200.333, or another governing directive, after the file is closed (whichever is greater). Any documents submitted to HCA by North Sound BH-ASO may be construed as "public records", as defined in Chapter 42.56 RCW, and therefore subject to public disclosure within HIPAA guidelines

PROCEDURES

Hard copy records retained must be kept in a locked storage cabinet with access only to authorized individuals. Hard copy records may be kept on-site as storage space allows. However, once the capacity for the files has exceeded the allotted space, records may be kept at an approved off-site storage facility compliant with applicable record retention and security requirements. Once the retention timeline has been met, records requiring permanent retention will be sent to the Washington state Archives for storage. This includes requirements for storage of records containing PHI and/or e-PHI as required by Health Insurance Portability and Accountability Act (HIPAA)/HIPAA Health Information Technology for Economic and Clinical Health Act (HITECH) and for which the North Sound BH-ASO has established a contract, to include Business Associate Agreement (BAA).

Once the hard copy records from a team, program, or committee, are identified to be stored off-site, it is the responsibility of that team, program, or committee Administrative Assistant to gather all the files into banker's boxes and provide them to the Administrative Assistant responsible for Records Retention.

When preparing hard copy records to be relocated for retention off-site, it is the responsibility of the Administrative Assistant for Records Retention to follow the written procedures, outlined in Attachment 1025.01.

If records are required to be sent to the Washington State Archives for permanent archival or appraisal for permanent archival, it is the responsibility of the Administrative Assistant for Records Retention to follow the written procedures, outlined in Attachment 1025.02.

The Administrative Assistant for Records Retention is also to maintain accurate and up-to-date procedures, location of internal locked records location, listing of individuals with specific access to each record set, a spreadsheet tracking of record off-site storage information and is accountable for ordering supplies necessary for off-site storage.

An update of the list of all records retained on-site will be performed annually to ensure the records sets reported previously as being retained on-site has not changed. Interim changes to this list of records or the corresponding access list should be reported by the responsible designated record set holder as they occur. New record sets will be added to the list maintained by the Administrative Assistant responsible for Records Retention in consultation with the Privacy Officer and accounted for according to the governing retention policy.

Responsibility for storing hard copy or paper records off-site falls under the purview of the Administrative Support team and responsibility for policy, procedures and oversight of storing electronic records, media and data off-site falls under the purview of HIPAA Security Officer.

ATTACHMENTS

1025.01: Off Site Storage Procedure

1025.02: Off Site Storage Procedure- State Archives

1025.03: Records Retention Schedule