

**KING'S DAUGHTERS MEDICAL CENTER      AUDIT, COMPLIANCE & ETHICS  
PROGRAM POLICY**

**POLICY AND PROCEDURE**

**EFFECTIVE DATE: DECEMBER 17,  
2013**

**SUPERSEDES POLICY DATED:  
6/21/12; 6/30/11; 12/1/10; 5/1/04; 5/3/99**

**FILE: A (5)**

**SUBJECT: RECORDS MANAGEMENT  
PROGRAM**

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**POLICY:** The Medical Center requires that its records be maintained in a consistent and logical manner and be managed so that the Medical Center:

- a. meets legal standards for protection, storage and retrieval;
- b. protects the privacy of patients, employees, agents and contract parties, as required by law or contract;
- c. optimizes the use of space and minimizes the cost of record retention; and
- d. destroys outdated records in an appropriate manner.

**PROCEDURES**

1. Oversight of Records Management Program. The Medical Center's General Counsel, in collaboration with the Office of Audit, Compliance & Ethics (OACE), shall oversee the records management program, and periodically review the record retention schedule (the "Retention Schedule"), amend it as appropriate, and conduct periodic audits to ensure compliance. Any requests for changes to the records retention schedule should be submitted to OACE.
- \* 2. Records Covered by Program. All Records, as defined herein, created, received, and maintained by Medical Center officers, directors, agents, independent contractors, or team members in the course of their duties on behalf of Medical Center must be retained and destroyed as provided in the Retention Schedule, attached hereto as Attachment A. "Records" include records in paper, electronic, or any other format, generated by any officer, director, agent, independent contractor or team member of the Medical Center, or received by an unrelated third party, including, without limitation, the following:
  - 2.1 The Electronic Health Record ("EHR") is an electronic record of patient health information generated by one or more encounters in any care delivery setting. The EHR includes, but is not limited to, patient demographics, progress notes, problems, medications, vital signs, past medical history, immunizations, laboratory data, and radiology reports. The EHR is maintained on an electronic

health records system implemented by Medical Center (“EPIC”) and/or any EPIC-linked application. The EHR is the legal health record, unless the record consists of both the EHR and paper records, in which case a combination thereof would be deemed the legal health record.

2.2 Other Business Records (“OBR”) consists of both electronic and non-electronic records. OBR includes, but is not limited to, accounting/payment, contracts, payroll, employment, environmental, equipment, and business operating reports.

3. Imaged Information. Imaged information can be used to replace paper documents only when the image will be identical to the paper document. Medical Center must retain the paper records until the imaged information is verified as an identical replication of the paper document. The department responsible for maintaining the original Record shall use its best efforts to verify that the image maintained on electronic media is identical to the paper document (including, without limitation, text in margins, footnotes, etc.).

4. Storage of Records.

\* 4.1. OBR which (a) have not surpassed the retention period as set forth in the Retention Schedule and (b) are no longer needed in the relevant department may be stored off-site at Medical Center’s official designated depository, currently Tri-Data (Huntington, WV). Storage sites other than the department and/or Tri-Data must be approved by OACE. The procedure for submitting Records to Tri-Data is set forth on Attachment B to this policy.

4.2. EHR shall be maintained in electronic format for the period set forth in the Retention Schedule and in compliance with Information Service Technology’s operational policies and procedures.

5. Compliance with Retention Schedule. All Medical Center team members shall be responsible for ensuring that all Medical Center Records are created, used, maintained, preserved and destroyed in accordance with the Retention Schedule. Each department director shall: (a) be familiar with this policy; (b) educate departmental staff in understanding and complying with the policy and Retention Schedule; and (c) restrict access to confidential records and information in accordance with Medical Center policies and applicable law.

6. Destruction of Records. Records shall be destroyed only after the expiration of the applicable retention period in accordance with the destruction protocol set forth herein.

\* a. OBR stored at Tri-Data will automatically be destroyed by Tri-Data pursuant to the destruction date identified on the box, provided there is no litigation hold on the records.

- b. EHR shall be destroyed in accordance with the Retention Schedule.
  - c. Confidential and/or sensitive records to be destroyed shall be placed in locked console(s) available in each department, and gathered by Cintas security personnel for destruction. Confidential and/or sensitive materials may include (but are not limited to) medical records, x-rays, pharmacy records, drug screens, billing records, insurance records, prescriptions, and registration forms.
7. Ownership of Records. All Records are the sole and exclusive property of the Medical Center. No officer, director, independent contractor, agent, or team member by virtue of his/her position, has any personal or property right to such Records even though he or she may have developed or compiled them, including but not limited to Medical Center Records created on home or non-Medical Center computer equipment used by Medical Center team members for work-related purposes. The unlawful destruction, removal from files, processing other than as provided in the Records Management Program and personal use of Records is strictly prohibited.
- \* 8. Litigation and Investigations. Any Record that is potentially relevant to any pending or anticipated litigation, claim, audit, investigation or enforcement action shall be retained until final resolution of the matter. The Legal Services Department and/or OACE shall direct the appropriate departments of such investigation to immediately safeguard the relevant Records and to suspend the normal Record destruction protocols for relevant Records until the matter is fully resolved. Team members who become aware of a pending or threatened investigation or legal proceeding shall promptly notify Legal Services or OACE.
- Likewise, if the Medical Center is served with a subpoena, search warrant or similar official request or if there is reason to believe that Medical Center may be served with a subpoena, search warrant or similar official request, the department responsible for the storage and retention of such Records shall immediately halt any planned destruction or transfer of Records and shall comply with the Medical Center's Subpoena Policy.
9. Unapproved Destruction and Unauthorized Action. Information pertaining to unauthorized destruction, removal or use of Medical Center Records or regarding falsification or alteration of information in any Medical Center Record or document should be reported to OACE. The unauthorized copying, transfer, dissemination, destruction, removal, accessing or use of Medical Center Records is prohibited.
- \* 10. Exception. To obtain any exception from this policy, there must be a written plan approved by OACE that assures compliance with the basic objectives of this policy.

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Vice President/Chief Legal & Regulatory Officer

## ATTACHMENT A

\* **Effective: December 17, 2013**  
**Ashland Hospital Corporation d/b/a King's Daughters Medical Center**  
**Records Management Schedule**

Document Content	Retention Period <sup>i</sup>	Office of Record
Accident reports and claims (KDMC vehicles)	7 years	Safety & Security
Administration records (professional affiliations, memberships)	5 years	Varies
Administrative or work committees (not otherwise listed) – Minutes	5 years	Varies
Advertising, publicity and communications with public *	10 years	Marketing/Public Relations
Accounts payable, ledgers, schedules, etc.	7 years	Accounting
Accounts receivable, administrative allows, write-offs *	10 years	Business Office
Acquisitions (signed Asset Purchase Agreements, Bills of Sale)	Permanent	Legal
Acquisitions (proposed/negotiated, not completed)	3 years	Legal
Annual Report (Form 990 – including supporting records)	Permanent	Accounting
Articles of Incorporation, charter, bylaws, minutes and other incorporation records	Permanent	Legal
Audit reports (administrative audits (external and internal), Joint Commission) *	6 years	Varies
Audit reports (external financial audits) *	Permanent	Accounting
Audit reports (internal financial audits)	7 years	Internal Audit
Background reports (team member or contractor)	2 years	Human Resources
Bank records (statements, canceled checks)	7 years	Accounting
Bank loans and credit facilities (including Bond Financing)	7 years after debt is paid, refunded, etc.	Accounting

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Bank reconciliations *	6 years	Accounting
Bankruptcy (patient)	7 years	Business Office
Benefits (Team Members) – Compensation and benefit plans (documentation, summary plan, descriptions, reports, etc.)	15 years	Human Resources
Bids (construction or equipment)	6 years	Varies
Bills of sale, mortgages, deeds	Permanent	Legal
Billing Records *	10 years	Business Office
Blood records (donor, testing, processing, storage and distribution)	10 years	Laboratory
Blood transfusion records	10 years	Laboratory
Blueprints of buildings	Permanent	Facilities
Board of Directors, Executive Committee, Board Committees (Meeting Packets)	Permanent	Legal/Administration
Board of Directors, Executive Committee, Board Committee (Studies, surveys, reports, and presentations)	10 years	Legal/Administration
Board of Directors – meeting miscellaneous (correspondence, work papers, meeting notices)	15 years	Legal/Administration
Board of Directors – Policies and Procedures Manual	Permanent	Legal/Administration
Board of Directors – Self Evaluation Surveys	2 years	Legal/Administration
Bylaws and charter	Permanent	Legal
Calendars and diaries (Senior Management)	5 years	Varies
Calendars and diaries (team members and other than Senior Management) *	3 years	Varies
Capital budget acquisitions (equipment, including computer and related systems, including CERs)	5 years after decommission	Legal – contract Varies – equipment-specific information
Certificates of Need (granted)	Permanent	Legal
Certificates of Need (denied)	10 years	Legal

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Continuing Medical Education (CME) Records	7 years	Learning & Development
Continuing Nursing Education (CNE) Records	7 years	Learning & Development
Collection accounts (Patients)	5 years	Business Office
Collective Bargaining Agreement	Permanent	Legal and Human Resources
Computer systems (including control table reports, flow charts, file layouts, programs, screen formats, user manuals, training manuals)	5 years after decommission	IST
Computers (security violations)	6 years	IST/Safety-Security
Computers (system backup)	Until system decommission	IST
Computers (system security authorizations)	3 years	IST
Computer (warranty files)	Duration of warranty + 1 year	IST
Conflict of Interest Statements obtained under KDMC Policies and Procedures *	5 years	OACE/Human Resources
Contracts (executed) *	8 years after expiration	Legal
Contracts (proposed, not finalized)	2 years	Legal
Contracts – mortgages, notes and leases *	8 years after expiration	Legal
Copyright, trademarks, service marks, patent registrations *	Permanent	Marketing
Compliance documentation (including team member education)	5 years	OACE
Compliance Plan (including Code of Conduct)	Permanent	OACE
Corporate Officers and Directors (List and CV) *	Permanent	Administration
Corrective Action Plans (team member records)	3 years	Human Resources
Correspondence/e-mail, administrative (related to strategic planning, structural issues, substantial corporate actions, including e-mail)	3 years	Varies
Correspondence/e-mail, general (non-administrative, routine incoming/outgoing and internal correspondence) <sup>ii</sup>	0-1 year	Varies

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Correspondence/e-mail related to lawsuits, regulatory issues or government investigations *	10 years	Legal
Correspondence/e-mail with patients and vendors (not retained under another category) <sup>iii</sup>	0-2 years	Varies
Credentialing Records (medical staff and allied health professionals)	10 years	Medical Affairs
Credentials Committee – Minutes	10 years	Medical Affairs
Credit extensions (patients)	5 years	Business Office
Credit Records (patients) (including NSF checks, Promissory Notes, etc.)	7 years	Business Office
Deeds, mortgages, bills of sale	Permanent	Legal
Deposit Records, EFTs	7 years	Business Office
Depreciation schedules	7 years after depreciation	Accounting
Dispositions (proposed/negotiated, not completed)	3 years	Legal
Dispositions (signed Asset Purchase Agreements, Bills of Sale)	Permanent	Legal
Donations, endowments, bequests (to or from KDMC)	5 years	Varies
EASY Reports (including PCEs) *	10 years; or if minor, majority + 10 years	Risk Management
EFTs, deposit records	7 years	Business Office
Elevator certification	As long as certification active	Plant Operations
E-mail/correspondence, administrative (related to strategic planning, structural issues, substantial corporate actions)	3 years	Varies
E-mail/correspondence, general (Non-adminstrative, routine incoming/outgoing and internal correspondence)	1 year	Varies
E-mail/correspondence related to lawsuits, regulatory issues, or government investigations *	10 years	Legal

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
E-mail/correspondence with patients and vendors	2 years	Varies
Emergency Operations Program and Drills Documentation (including reports related to fire drills) *	Permanent	Safety-Security
Employee accident/illness/injury report (including OSHA Form 101) *	5 years	Human Resources
Employment applications	7 years from record creation or personnel action	Human Resources
Employee Assistance Program records	10 years	Occupational Health
Employee Data Sheet Summary	Permanent	Human Resources
Employee discrimination reports (EEOC, ADA, etc.)	Permanent	Human Resources
Employee – exit interviews	10 years from date of interview	Human Resources
Employee Benefits – Compensation and benefit plans (documentation, summary plan descriptions, reports, etc.)	15 years	Human Resources
Employee Health Records (Team Health Records)	10 years after employment terminates, unless otherwise dictated by HR Policy	Human Resources
Employee Personnel Record (except FMLA)	10 years after employment terminates, unless otherwise dictated by HR Policy	Human Resources
Employees (Union) – arbitration and grievance records	10 years	Human Resources
EMTALA Records	6 years	Emergency Department
Environmental – general, unregulated waste disposal	3 years	Facilities
Environmental – Hazardous Waste records	3 years	Facilities
Environmental – Medical Waste records	3 years	Facilities
Environmental – Notices of Violation (NOV)	5 years	Facilities
Environmental – Team member exposure to regulated substance	30 years	Facilities



<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Environmental – Evidence of conservation efforts	3 years	Facilities
Environmental – regulated water discharge	6 years	Facilities
Environmental – Site Assessment and Remediation	Permanent	Facilities
Equipment – Capital Equipment Requests (CER)	7 years	Materials Management
Equipment – depreciation	Until 7 years after fully depreciated	Accounting
Equipment – service records *	5 years after decommission	Varies
Family and Medical Leave Act records (FMLA) <sup>iv</sup>	3 years	Human Resources
Financial Reports (monthly)	7 years	Accounting
Financial Statements (interim, supplemental and year-end)	7 years	Accounting
Fire Drill Program (reports, inspections, minutes)	Permanent	Safety-Security
Fire extinguisher records	3 years	Facilities
Food Services – daily meals served (cafeteria and patient trays, including diet requisitions)	1 year	Food Services
Food Services – menus	2 years	Food Services
Garnishment	6 years	Payroll
General ledgers (year-end trial balance, journals)	Permanent	Accounting
Governmental reports (mandatory)	10 years	Varies
Government reports (voluntary)	5 years	Varies
Grants (funded)	3 years after closure	KHF (on behalf of KDMC)
Grants (unfunded)	1 year	KHF (on behalf of KDMC)
Hazardous Waste Records	3 years	Facilities
HIPAA and HITECH compliance records	6 years	Safety-Security
I-9s	3 years after hire date	Human Resources

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Infection Control Committee – Minutes	10 years	Quality Management
Insurance – Bonds	5 years	Legal
Insurance – Certificates (KDMC)	5 years	Legal
Insurance – Certificates (Vendors)	5 years	Legal
Insurance – Claims	5 years	Legal
Insurance – Inspections	5 years	Varies
Insurance – Policies	Permanent	Legal
Intellectual Property (Copyright, trademark, service mark, patent registrations) *	Permanent	Marketing
Institutional Review Board (IRB) – Minutes	Permanent	Office of Research
Institutional Review Board (IRB) – Records	25 years; minors or pregnant subjects – majority of child + 25 years	Office of Research
Investment records (buying and selling)	10 years	Accounting
Invoices	7 years	Accounts Payable
Job announcements	2 years	Human Resources
Job descriptions	3 years	Human Resources
Joint Commission and regulatory reports (including responses to investigations) *	10 years	Legal
Journals	Permanent	Accounting
Laboratory – blood records (control systems for donor testing, processing, storage (including daily temperature monitoring) and distribution)	10 years	Laboratory
Laboratory – Blood transfusion records	10 years	Laboratory
Laboratory – Surgical pathology reports	10 years	Laboratory
Laboratory – Quality Control Records	5 years	Laboratory
Laboratory – Pathology Slides	10 years	Laboratory

<b>Document Content</b>	<b>Record Retention</b>	<b>Office of Record</b>
Laboratory – Test Requisitions/Accession logs	2 years	Laboratory
Laboratory – Quality Assurance Records	2 years	Laboratory
Licenses/Operating Permits (other than related to Environmental, Health & Safety)	3 years	Varies
Licenses and Permits (Environmental, Health & Safety)	10 years	Facilities
Litigation – filed suits, claims, hearing, investigations, etc. *	10 years; if minor involved, majority of child + 10 years	Legal
Litigation – Loss Run Report	10 years	Legal
Litigation – Settlement agreements and releases	Permanent	Legal
Loan documents and notes	Permanent	Legal
Logs and Registers (birth, death, surgery) *	Permanent	Varies
Master Patient Index *	Permanent	Medical Records
Medical Audit Committee – Minutes	10 years	Varies
Medical Executive Committee – Minutes	10 years	Medical Affairs
Medical Records Committee – Minutes	10 years	Medical Records
Material Safety Data Sheets (MSDS)	Permanent	Safety-Security
Medicaid Cost Reports *	10 years	Accounting
Medical Records (all, including Mammography, Home Health, Rehab, Radiology, Cardiovascular, etc.) *	10 years; if minor, majority + 10 years	Varies
Medical Staff – Minutes (including Section Minutes)	10 years	Medical Affairs
Medical Waste records	3 years	Facilities
Medicare cost reports *	10 years	Accounting
Medicare Secondary Payer Reporting	10 years	Business Office
Minutes – Corporate Compliance Committee (including related records) *	Permanent	OACE

<b>Document Content</b>	<b>Record Retention</b>	<b>Office of Record</b>
Minutes – Credentials Committee	10 years	Medical Affairs
Minutes – Infection Control Committee	10 years	Quality Management
Minutes – Institutional Review Board (IRB)	Permanent	Office of Research
Minutes – Medical Audit Committee	10 years	Varies
Minutes – Medical Staff (including Section Minutes)	10 years	Medical Affairs
Minutes – Medical Executive Committee	10 years	Medical Affairs
Minutes – Medical Records Committee	10 years	Medical Records
Minutes – Quality Assurance Committee	10 years	Quality Management
Minutes – Radiation Safety Committee	10 years	Radiology
Minutes – Utilization Review Committee*	10 years	Care Management
Minutes of Boards of Directors and Board Committee Meetings	Permanent	Legal
Minutes of Administrative or Work Committees (not otherwise listed)	5 years	Varies
Miscellaneous records (not otherwise listed)	0-2 years	Varies (not sent to retention)
Mission Statements, Strategic Plans	Permanent	Varies
Mortgages, deeds, bills of sale	Permanent	Legal
Notary commissions	Active	Varies
Notes receivable ledgers and schedules	7 years	Accounting
Notices of Violations (NOV) (Environmental, Health & Safety)	6 years	Facilities
Organization charts*	Permanent	Administration
OSHA Form 101 reports (accident/illness/injury of team members)*	5 years	Human Resources
OSHA 200 logs*	5 years	Human Resources
OSHA records related to medical exams	30 years after termination	Facilities

<b>Document Content</b>	<b>Record Retention</b>	<b>Office of Record</b>
Patents and related papers	Permanent	Marketing
Patient Transfer Records	5 years	Emergency Department
Payroll records and summaries (including expense reports and reimbursement and records related to team member leave) (Equal Pay Act Act, FLSA), W-2s, W-4s	7 years	Human Resources
Personal Protection Equipment (Fit testing and issuance)	While active	Facilities
Personnel Records - team members (all relevant information other than FMLA)	10 years after employment ends, unless otherwise dictated by HR Policy)	Human Resources
Personnel Records - volunteers	6 years	Volunteer Services
Petty cash vouchers	3 years	Accounting
Pharmacy records *	6 years	Pharmacy
Physician and Allied Health Professional Credentialing files	10 years	Medical Affairs
Physician Recruitment Materials * (other than signed contracts)	10 years	Physician Recruitment
Policies and Procedures *	Permanent	Administration
Property appraisals by outside appraisers	Permanent	Facilities
Property blueprints and facility utility diagrams	Permanent (or until property sold)	Facilities
Property (equipment) records including costs, depreciation schedules	Permanent	Varies
Purchase orders	7 years	Varies
Quality Assurance Committee – Minutes	10 years	Quality Management
Radiation Safety Committee – Minutes	10 years	Radiology
Radiology – Leak testing records of sealed sources, ambient dose surveys	5 years	Radiology

<b>Document Content</b>	<b>Record Retention</b>	<b>Office of Record</b>
Radiology – Data, surveys, measurements, reports Document Content *	5 years	Radiology
Records Management Schedule	Permanent	OACE
Reference Files	0-5 years	Varies
Registers and Logs (birth, death, surgery) *	Permanent	Varies
Regulatory reports, responses to investigations (including Joint Commission)	6 years	Legal
Replacement workers plans and related records	10 years	Human Resources/Legal
Research (including legal and financial research and opinions not related to a specific lawsuit or acquisition)	5 years	Varies
Retirement and pension records	Permanent	Human Resources
Scholarship Records	3 years	Foundation
Scheduling/staffing records	3 years	Varies
Security Incident Reports	7 years	Safety-Security
Security records (excluding Security Incident Reports)	5 years	Safety-Security
Stock and bond certificates (cancelled)	7 years	Accounting
Studies, surveys, reports and presentations to Board of Directors, Executive Committee, Board Committees, Senior Management (including feasibility studies)	10 years	Varies
Subpoenas	1 year	Legal
Tax returns (including Form 990) and worksheets *	Permanent	Accounting
Team member accident/illness/injury report * (including OSHA Form 101)	5 years	Human Resources
Team member – Employment applications	7 years from record creation or personnel action	Human Resources
Team Member Assistance Program records	10 years	Occupational Health

<b>Document Content</b>	<b>Retention Period</b>	<b>Office of Record</b>
Team Member Data Sheet Summary	Permanent	Human Resources
Team Member discrimination reports (EEOC, ADA, etc.)	Permanent	Human Resources
Team Member – exit interviews	10 year from date of interview	Human Resources
Team Member Benefits – Compensation and Benefit Plans (documentation, summary plan, descriptions, reports, etc.)	15 years	Human Resources
Team Health Records (formerly known as Employee Health Records)	30 years	Occupational Medicine
Team Member Personnel Record (except FMLA)	10 years after employment terminates, unless otherwise dictated by HR Policy	Human Resources
Team Members (Union) – Arbitration and Grievance records	10 years	Human Resources
Timesheets, books, cards	3 years	Human Resources
Training manuals (including orientation materials)	3 years	Learning & Organizational Development
Union negotiations and minutes	10 years	Human Resources
Utilization Review Committee – Minutes *	10 years	Care Management
Volunteer records	6 years	Volunteer Services
Visitor Sign-in Sheets	2 years	Safety-Security
Vouchers for payments to vendors, team members, etc (includes team member/officer travel & entertainment expense reimbursement)	7 years	Varies
Wage records	10 years	Human Resources
Withholding tax statements (FICA, FUTA, Federal Income)	7 years	Payroll
Workers compensation documentation *	5 years	Human Resources

**ATTACHMENT B**

\* **BOX-PICKUP-RETRIEVAL FORM (BPR)**

**INSTRUCTIONS:** Complete the form, mark the appropriate boxes, and fax the form to TRI-DATA's Records Center at **304-429-1600**.

- Date: \_\_\_\_\_, 20\_\_
- Full Name of Department: \_\_\_\_\_
- Team Member First/Last Name: \_\_\_\_\_
- Team Member Phone Number: \_\_\_\_\_
- \* ◦ Entity:  KDMC  KHI  KDMS  KHF  CDC  KDMT

**ACTION REQUESTED:**

**Pickup by Tri-Data:**

Identify number of boxes: \_\_\_\_\_  
Identify Pickup Location: \_\_\_\_\_  
Date Pickup Requested: \_\_\_\_\_

**Delivery of Existing Boxes by Tri-Data::**

Identify number of boxes: \_\_\_\_\_  
Identify Department Box No(s): \_\_\_\_\_  
Date Requested: \_\_\_\_\_

**TEAM MEMBER CERTIFICATION:**

I authorize Tri-Data to perform the requested action. I certify that the

- ✓ Materials are properly boxed in accordance with KDMC or my subsidiary policy and procedure;
- ✓ Pre-printed box label is complete with the department name, departmental box number, and destruction date;
- ✓ Box does not contain any hazardous materials; and
- ✓ Documents are in compliance with the applicable current Retention Schedule.

\_\_\_\_\_  
Team Member Signature

Deliveries of partial boxes are not available. Tri-Data will not pick up any boxes which do not contain the department name, departmental box number, and destruction date. Courier services outside the regular Monday-Friday service period of 8:00 a.m. to 4:30 p.m. will be charged a higher rate.



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<sup>i</sup> Unless otherwise indicated, retention periods are for the active/current period of the document plus the stated number of years. Records in paper or electronic format are subject to the retention schedule.

<sup>ii</sup> These records may be retained up to the number of years noted, but are not required to be retained for any minimum time period.

<sup>iii</sup> These records may be retained up to the number of years noted, but are not required to be retained for any minimum time period.

<sup>iv</sup> Must be maintained separate from personnel file.

Records in paper or electronic format are subject to the retention schedule.

E-mails must be manually saved, in electronic or hard copy. There is not automatic save for e-mails currently in place.