	Department: Corporate Compliance	Policy No.: 106
	TITLE: DOCUMENT RETENTION	
Effective Date: 1/1/15	Revised: 1/1/15	

DOCUMENT RETENTION

SCOPE:

All Ascension At Home, LLC colleagues. For purposes of this policy, all references to “colleague” or “colleagues” include temporary, part-time and full-time associates, independent contractors, clinicians, officers and directors.

PURPOSE:

To set forth a document retention policy to be followed by Ascension At Home, LLC and its subsidiaries’ (the “Company”) colleagues in the maintenance of certain records relevant to our compliance efforts. This policy may be expanded in the future to include all Company documents.


POLICY:

All Company personnel, and contractors including suppliers and clinicians, must comply with the policies relating to the retention, distribution, storage, retrieval and destruction of documents that are relevant to our compliance efforts. All documents relevant to our compliance efforts must be retained for a period of ten years. These documents must be accessible and must not be destroyed without prior supervisor approval or by following routine daily procedures.

PROCEDURE:

Type of Compliance Documents

- Patient charts and medical records;
- Billing statements, files, databases, claims, and provider enrollment documents;
- Correspondence, letters, subpoenas and search warrants from Medicaid and Medicare carriers, Department of Health and Human Services, Department of Justice, Centers for Medicare/Medicaid Services, Federal Bureau of Investigations, state and local government and healthcare agencies;
- Documents that support the Compliance Program policies and procedures such as education and training records, monitoring and auditing records, audit logs, helpline logs, disciplinary logs, exit interviews, reports of misconduct, etc.; and
- Internal billing and coding policies and procedures.

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Distribution of Documents

- All documents listed above must be protected and guarded as confidential. These documents will be distributed only to those persons that need the documents to perform their job responsibilities.
- All documents listed in lines 3 through 5 above must be copied or forwarded to the Compliance Officer as soon as reasonably possible.

Destruction of Documents

- All documents listed above may only be destroyed with supervisor approval or by following prior written routine policies of the company (see Record Retention Schedule).
- When destroying these documents, always use a shredder.

Storage of Documents

- Documents must be stored in a fire-proof and water-proof location. The location of these documents must be communicated to the Chief Compliance Officer (and a log must be maintained).

Retrieval of Documents

- All documents must be retrievable via electronic or hard copy.
- The hardware or software to access the documents must be available and usable.