

# THE CENTER FOR DISCOVERY

SUBJECT: Corporate Compliance Office Records Management	MANUAL: Corporate Compliance
	SECTION: Section 4

## Purpose:

To provide guidance on the establishment and maintenance of a Corporate Compliance Office records-management system. Policies relating to this area are addressed in the program-specific operational policies and procedures of the Center for Discovery. This policy relates to all records and other information, in both electronic and hardcopy format (hereinafter collectively referred to as “records”) generated by the Corporate Compliance Office. The OIG notes two types of documents should be addressed by this process:

1. Records and documentation relating to clinical and medical records, MSC records, Residential and Day Habilitation records and claims documentation. Records pertaining to audits will also be maintained.
2. Records necessary to protect the integrity of the compliance process and confirm the effectiveness of the program. This includes information received from individuals who have been promised confidentiality when reporting incidents or situations to the Corporate Compliance Office, as well as findings from investigations..

## Policy:

1. The Corporate Compliance Office is responsible for developing a system of records that relate to the Corporate Compliance program operation (e.g., documentation that individuals were adequately trained; reports from the hotline, including the nature and results of any investigation that was conducted; modifications to the compliance program; self-disclosures; and results of auditing and monitoring efforts).
2. Record documentation relating to the Corporate Compliance program will be maintained and available for periodic independent ongoing auditing and monitoring review of the effectiveness of the compliance program, as well as for any possible litigation reviews and audits.
3. Certain records must be maintained for given periods of time, as specified by applicable laws/regulations, or as required by contractual obligations, or as required by The Center for Discovery Record Retention Policy. Other records should either be retained or destroyed pursuant to this policy.
4. All records related to a specific incident should be retained if a review or investigation is ongoing. Otherwise, all records should be destroyed on a periodic basis unless applicable state or federal laws and regulations, or agency policy, require longer retention. The exception to this general policy is that all program overview memoranda, reports, and meeting minutes should be retained in order to maintain a record of the compliance program operations.
5. Specifically, this policy outlines the procedures for establishing periods for records retention in active or inactive storage. It also provides for the disposition of records at the

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conclusion of the retention periods. Records will only be destroyed pursuant to a standard policy so as to avoid any implication that the compliance office deliberately destroyed records in anticipation of a particular problem.

## Procedures:

1. Compliance office records will be kept secure and confidential to protect employee privacy rights and the privacy rights of the people served, as well as proprietary information, under the responsibility and direction of the Corporate Compliance Officer.
2. The Corporate Compliance Office is responsible for the implementation of this record-management policy, including retention of records in active or inactive storage for defined time periods and the disposition of records at the conclusion of the retention period.
3. All Corporate Compliance Office records, including mail, hotline records, and other information received by the Office will be maintained in a secure filing cabinet in a secure office so that unauthorized individuals are not in a position to come into possession of or view them. Any electronic database will be controlled via pass codes.
4. Any sensitive information, such as that relating to affected individuals or people served, and any proprietary information received by facsimile will be received only through a secure line.
5. All information relating to information provided to the Corporate Compliance Office or the Corporate Compliance Hotline will be maintained in the files until such time as the matter is resolved. The Corporate Compliance Officers are charged with developing a system to document the following steps in the records management process:
  - a. identification, control and maintenance of files and records
  - b. retrieval and return of records to and from file storage
  - c. destruction of records and deletion from the records inventory
    1. All information that might lead to the identity of an individual is stored securely locked in a file cabinet and destroyed via shredding by the Corporate Compliance Office to ensure confidentiality.
    2. Upon notice of the initiation of an investigation or the service of legal process, the Corporate Compliance Officers will immediately direct The Center of Discovery staff to cease the routine destruction of any relevant documents until notified that the investigation or litigation has been concluded. Relevant records will be delivered to agency legal counsel.

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