

INFORMATION IS...
INSIGHT

HEALTH INFORMATION MANAGEMENT:

GETTING IT RIGHT FROM THE START

THE BASICS OF RECORDS RETENTION SCHEDULES



INTRODUCTION

A QUICK GUIDE TO HELP YOU PLAN, CREATE AND MANAGE RETENTION SCHEDULES FOR YOUR HEALTH SYSTEM.

Successful health information management lets you effectively govern your physical and digital records throughout their lifecycle. Your records retention schedule is the cornerstone of good health information management. It is an important step not only in achieving compliance, but also in controlling costs and risks, and in providing a foundation for governance across the enterprise.



YOUR CLINICIANS NEED INFORMATION ACCESS

WHAT IS A RECORDS RETENTION SCHEDULE?

Your records retention schedule is a policy that defines your health system's legal and regulatory requirements so that your records are:

- ▶ Maintained in accordance with security and access controls.
- ▶ Kept as long as legally and operationally necessary.
- ▶ Securely disposed of when they reach the end of their retention period.

An authorized retention schedule serves as your universal guide for the retention and disposition of records. It is supported by your Records and Information Management Policy: an overarching document that describes the proper management of paper and electronic records from creation through to disposition.

WHY IS A RECORDS RETENTION SCHEDULE IMPORTANT?

Your schedule will contain the different business and clinical records created and used in your organization, regardless of format, and indicate how long each class of record must be retained to meet legal, regulatory and operational requirements. Retention periods vary depending on the state or states in which you operate, type of record, types of business activity, age of patients and other criteria. Gaining buy-in from your legal and compliance departments and stakeholders across your enterprise will help achieve organization-wide acceptance.

Having and consistently applying a policy is evidence of good faith and reasonable effort – an important factor during litigation, audits or investigations. To ensure the legal accuracy and credibility of your schedule, consider seeking help from an external expert with access to relevant rules and regulations for the healthcare industry.

A records retention schedule is the cornerstone in your overall program which also addresses:

- ▶ Legal Holds: It is critical for the organization to have explicit directions for the suspension of records destructions in the event of legal actions.
- ▶ Policy Enforcement: Governance ensures that it is clear who is responsible for applying policies and the consequences for failing to do so. Organizations should have clearly documented enforcement protocols.

Just 34% of healthcare organizations surveyed have mature Retention Schedule policies and practices.

Cohasset Associates | AHIMA 2014 Benchmarking White Paper on Information Governance in Healthcare - A Call to Adopt Information Governance Practices.



GET THE RIGHT INFO TO THE RIGHT CLINICIANS AT THE RIGHT TIME

WHAT ARE THE ADVANTAGES OF A RETENTION SCHEDULE?

Achieving legal and regulatory compliance is paramount. A well-managed schedule also enables you to:

- ▶▶ Reduce electronic and paper storage to save space and decrease costs.
- ▶▶ Reduce costs associated with litigation by knowing what you have and where to find it.
- ▶▶ Mitigate exposures from data breaches by protecting your most sensitive records.
- ▶▶ Control the volume of records.
- ▶▶ Improve the speed and accuracy of records retrieval.
- ▶▶ Facilitate access to critical information to enhance patient care.

WHERE DO YOU START?

Proper information management begins with knowing the records you create and receive across your health system. Best practices for getting started include:

- ▶▶ Identifying your repositories of clinical and business records.
- ▶▶ Reviewing and adjusting triggering retention events to be implementable (this may require guidance from Legal and IT).
- ▶▶ Engaging with IT to map your repositories to record classes to then implement retention rules.
- ▶▶ Understanding which records are official business records versus those that are copies or transitory. Retain records that must be kept for legal, regulatory or business reasons. Copies should be retained until they are no longer needed.
- ▶▶ Initiating routine clean up of departmental records.

If you don't want to start from scratch, external subject matter experts can help you accelerate the process of creating your classification scheme and supporting legal research to create a records retention schedule that fits your organization and risk environment.

WHAT IS A RETENTION PERIOD?

A retention period is typically expressed in the number of years a record must be kept from its date of creation, or it could be contingent on an event such as the age of a patient past majority. There may also be classes of business records that are kept indefinitely based on their high value, such as articles of incorporation or intellectual property.

Retention periods are determined by research into state and federal laws. In some instances, a record may also have a period of liability or a statute of limitations. For business records, the retention period can be extended – never shortened – to reflect the operational requirements of the organization. It is good practice to document why a retention period is extended to both defend your reasoning and to discourage a natural tendency to want to keep records longer just in case they may someday be needed. All records are discoverable in the event of litigation and over-retention of records beyond legal requirements is discouraged. And, having easy access to the citations used in setting the legal requirement is advantageous for your legal and compliance teams.

HOW DOES YOUR RETENTION SCHEDULE WORK?

Publish your retention schedule so employees can find it easily. A dedicated intranet site with search and browse capabilities is a good mechanism or a cloud-based retention schedule.

People can use the schedule to assign rules to their content. The rules can also be passed to repositories that house records. Those systems – paper or electronic – can then utilize the retention schedule's rules through an API

connector or manual implementation. Retention periods and triggering retention events can be applied to your electronic or paper-based systems to calculate eligible disposition.

HOW OFTEN DOES A RETENTION SCHEDULE NEED TO BE REVIEWED?

A retention schedule is dynamic. Retention periods can change when laws and regulations are updated. Make sure that you review your schedule frequently to determine the impact of any legal or business changes.

WHAT DOES SUCCESS LOOK LIKE?

Make records and information management awareness a priority for clinicians and the organization beyond the HIM department – including your back office and business staff, contractors and vendors and other Business Associates. Educate and communicate as frequently as possible. Make sure that your retention schedule includes records in all formats, from all departments and functions.

Collaborate with your HIM, IT, compliance, risk and legal departments and business staff to understand their concerns about effective information management. And finally, use metrics to provide evidence that action is being taken to manage information according to your policy, including final disposition.

LOOKING FOR MORE GUIDANCE?

To help you develop and maintain your retention schedule, Iron Mountain offers professional services to help. Contact Iron Mountain at 800-899-4766 for more information.

Get in touch now

Call us: 1.800.899.4766

ABOUT IRON MOUNTAIN

Iron Mountain Incorporated (NYSE: IRM) is a leading provider of storage and information management services. The company's real estate network of over 67 million square feet across more than 1,000 facilities in 36 countries allows it to serve customers around the world. And its solutions for records management, data management, document management, data center management, and secure shredding help organizations to lower storage costs, comply with regulations, recover from disaster and better use their information. Founded in 1951, Iron Mountain stores and protects billions of information assets, including business documents, backup tapes, electronic files and medical data. Visit www.ironmountain.com for more information.

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US-HLT-EXT-TT-042715-001



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