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Instructions

Step 1 – Review the definitions of Secure vs. Unsecure and Known vs. Unknown below.

Step 2 – Review all criteria (boxes A – F) on pages 2 and 3.

Step 3 – Begin workflow on page 4, follow workflow until ending on a Normal Operations process box for each response from the survey.

Step 4 – Complete the Document Retention Worksheet for each department response.

Step 5 – FCO and CEO sign attestation, affirming the completion of the Document Retention Project Tool for each survey respondent.

Step 6 – Review Document Retention Project Tool with the Facility Compliance Committee and upload signed attestation to the FCC Minutes.

Definitions

Secure – Meets all requirements of physical security criteria. (see Security criteria on page 2, Box A or Box B)

Unsecure – One or more deficiencies of physical security criteria. (see Security criteria on page 2, Box A or Box B)

Known – Facility maintains an accurate log, manifest or inventory of stored material. Documents that are required for recall can be obtained in a timely manner without searching through multiple boxes.

Unknown – Facility has boxes stored which lacks a log, manifest or accurate inventory of contents.

Facility – Hospital, Physician Practice, Surgery Center or other affiliated entity.

Destroy – Destruction of documents must be in accordance with the CHSPSC Document Retention policy, HIIM policy and any applicable litigation holds (see Box D on page 2, for approved destruction vendors.)

Responsibility Legend

FCO / Facility	FCO / Move Team	Compliance / CCD	Legal & Compliance	Normal Operations
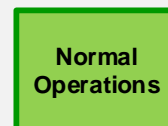
See Definitions on Page 1

See Box References on Pages 2 & 3

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Box A

On-Site Physical Security Criteria

- Storage location is within the main facility
- Secured behind locked door and access is limited to appropriate facility personnel

Box B

Off-Site Physical Security Criteria

- Perimeter Security (e.g. fence, proximity sensors, monitored cameras, 24/7 Guard)
- All entry points are locked
- Controlled access to facility via badge, guard, key or keypad
- All employees must have background checks to screen out potential employees for arrests and/or convictions including: theft and/or identity theft
- Access log maintained
- 24/7 guard and/or video surveillance
- Intrusion, fire protection and moisture alarm system
- HVAC climate controlled to prevent freeze and exposure to extreme heat
- Multi tenant storage segregation; CHS affiliate storage is inaccessible to others

Box C

On-Site storage requirements

- Documents stored on-site require immediate and frequent access or planned storage less than one year
- Accurate index of all documents are maintained
- All boxes are labeled with destruction dates
- Destruction of documents is timely and pursuant to the CHS PSC Document Retention Policy and schedule
- On-Site storage location is an effective use of facility space

Box D

Document Move Process & Destruction Vendors

Note: *prior to initiating the move process, destruction criteria (Box F) must be applied. For any documents not meeting the criteria to be destroyed, execute one or more of the actions below:*

- Medical records in the HIIM Department: contact Regional HIIM Director for guidance storing with EvriChart
- All other documents, including documents with PHI, but not HIIM department medical records, contact Iron Mountain for previously negotiated discounted pricing
- If you do not have a contract with EvriChart or Iron Mountain for document storage, contact your CCD for guidance

Document Storage and Destruction Contact Information:
Email: johndoe@documentstorage.com

When sending a question to the mailbox, please have them indicate the following:

- ☐ Customer Name/Facility Name
- ☐ Customer ID (required)
- ☐ Division and Dept ID (required)
- ☐ Contact Information (Address and Phone Number)

Box E

Storage Cost Comparison Worksheet

- See attached Cost Comparison Excel spreadsheet
- Enter vendor costs into spreadsheet
- Compare projected Iron Mountain costs to vendor costs
- Consult with facility CFO to complete the cost comparison

Responsibility Legend

FCO / Facility	FCO / Move Team	Compliance / CCD	Legal & Compliance	Normal Operations
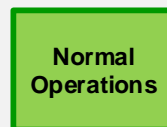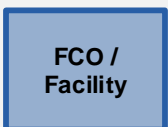
See Definitions on Page 1

See Box References on Pages 2 & 3

③

Box F

Metrics for Applying Destruction Criteria

Destruction Criteria
- Destroy documents with surpassed retention periods; <u>follow CHSPSC Document Retention policy definition of destruction</u>
- Destroy **Unknown** documents in storage for 15 years or greater; <u>follow CHSPSC Document Retention policy definition of destruction</u>
- **Excludes documents with a litigation hold, contact Legal if you are unsure if there is an active litigation hold**
- Contact an approved destruction vendor (Iron Mountain or Cintas contact information in Box D on page 2); Obtain certificate of destruction

Criteria for every group of Unknown documents in storage less than 15 years:

A. HIIM Medical Records; contact Regional HIIM Director for guidance

B. Answer the questions below for each group of Unknown non-medical record documents. **If required, contact CCD for guidance answering to questions 1 – 8**

1. Are there any accurate logs, manifests or inventories, formal or informal, maintained for these boxes?

2. Is a log kept of boxes retrieved from this location?

3. When was the last time a box was retrieved from this location? For what purpose was that box retrieved?

4. What types of documents are stored at this location?

5. How long have documents been stored at this location?

6. Were documents stored at this location prior to the acquisition of this facility by CHS?

7. Are documents currently being added to storage at this location?

8. When was the last time a box was added to storage at this location?

Responsibility Legend

FCO / Facility	FCO / Move Team	Compliance / CCD	Legal & Compliance	Normal Operations

See Definitions on Page 1

See Box References on Pages 2 & 3

CHS Community Health Systems

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Start

Documents stored On-site?
— Yes → **Meets all On-site physical security requirements?** *Box A*
— No → Go to Off-site Storage

Meets all On-site physical security requirements? *Box A*
— Yes → **Are the documents Known?** *Definitions*
— No → **Can the documents be secured?**

Can the documents be secured?
— Yes → (to Are the documents Known?)
— No → **Contact CCD ASAP**

Contact CCD ASAP → **Review Destruction Criteria** *Box F*

Are the documents Known? *Definitions*
— Yes → **On-site storage location meets requirements?** *Box C*
— No → **Review Destruction Criteria** *Box F*

On-site storage location meets requirements? *Box C*
— Yes → **Maintain Retention Requirements via CHSPSC Document Retention Policy**
— No → **Review Destruction Criteria** *Box F*

Review Destruction Criteria *Box F* → **Documents meet the destruction criteria?**

Documents meet the destruction criteria?
— No → **Initiate Move Process ASAP** *Box D*
— Yes → **Destroy** *Definitions & Box D*

Initiate Move Process ASAP *Box D* → **Maintain Retention Requirements via CHSPSC Document Retention Policy**

Destroy *Definitions & Box D* → **Obtain Certificate of Destruction**

Box D

Responsibility Legend

FCO / Facility	FCO / Move Team	Compliance / CCD	Legal & Compliance	Normal Operations

See Definitions on Page 1

See Box References on Pages 2 & 3

CHS Community Health Systems

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Off-Site Storage

Documents stored at Iron Mountain Or EvriChart — Yes → **Are the Documents Known?** *Definitions* — Yes → **Documents have met required retention period?** — No → **Maintain Retention Requirements via CHSPSC Document Retention Policy**

- Documents stored at Iron Mountain Or EvriChart — No → **Other Off-site Storage Vendors**
- Are the Documents Known? — No → **Review Destruction Criteria** *Box F*
- Documents have met required retention period? — Yes → **Review Destruction Criteria** *Box F*

Review Destruction Criteria *Box F* → **Documents meet the destruction criteria?**

Documents meet the destruction criteria? — No → **Maintain Retention Requirements via CHSPSC Document Retention Policy**

Documents meet the destruction criteria? — Yes → **Destroy** *Definitions & Box D* → **Obtain Certificate of Destruction**

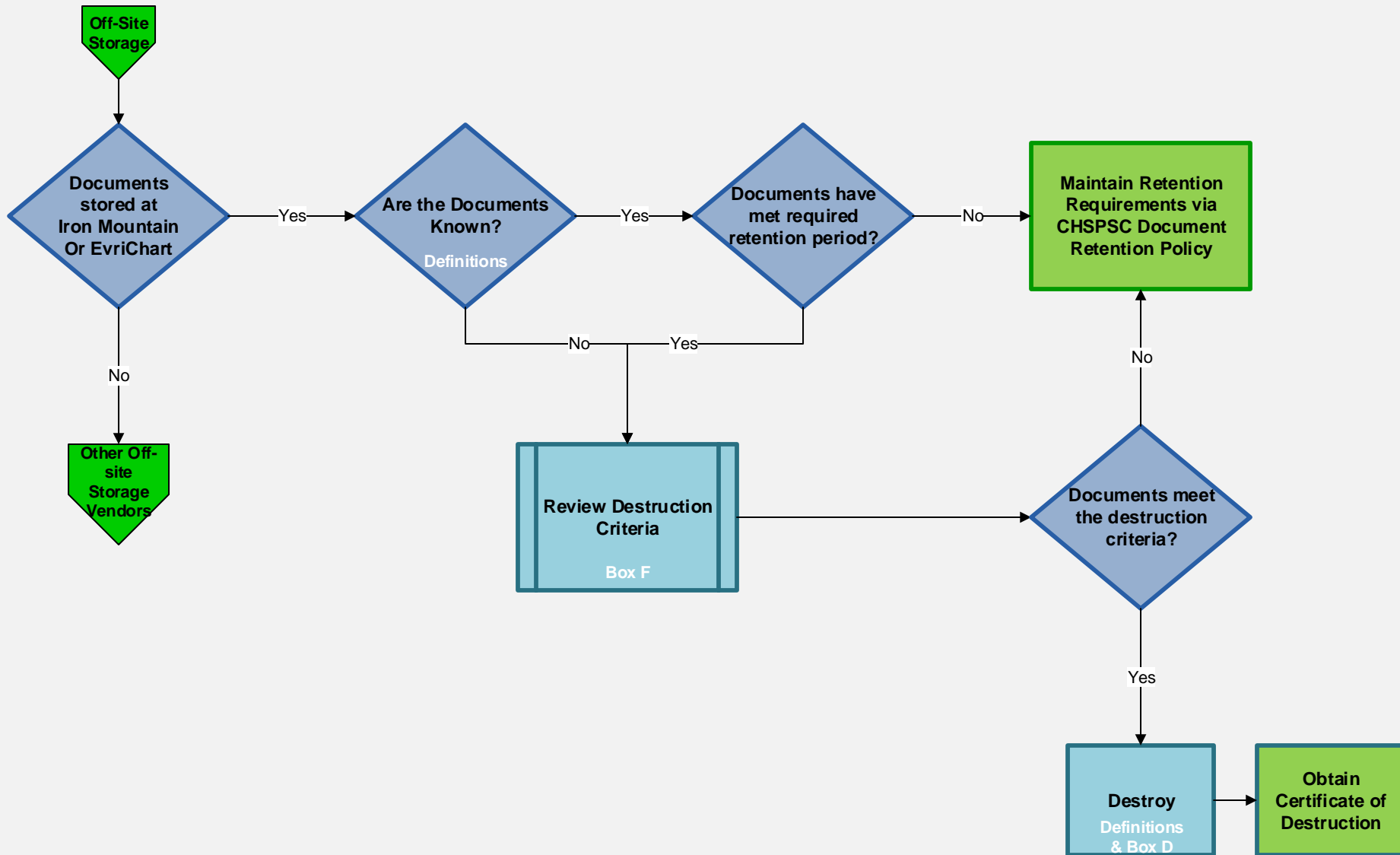## Responsibility Legend

FCO / Facility	FCO / Move Team	Compliance / CCD	Legal & Compliance	Normal Operations

See Definitions on Page 1

See Box References on Pages 2 & 3

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Other Off-site Storage Vendors

*To determine if BAA attached to contract is appropriate, please contact your Facility Privacy Officer.

Meets all Off-site physical security requirements? Box B
— Yes → **Is the vendor a Potential Referral Source?** Review FDQ
— No → **Is the financial arrangement cost effective?** Box E
— Yes → **Is there a current fully executed contract?**
— Yes → **Is there a current *CHS BAA attached to the contract?**

Meets all Off-site physical security requirements? — No → **Review Destruction Criteria** Box F

Is the vendor a Potential Referral Source? — Yes

Is the financial arrangement cost effective? — No

Is there a current fully executed contract? — No → **Contact CCD ASAP** → **Legal and Compliance Team Review**

Is there a current *CHS BAA attached to the contract? — Yes

Review Destruction Criteria Box F → **Documents meet the destruction criteria?**
— No → **Initiate Move Process ASAP** Box D
— Yes → **Destroy** Definitions & Box D → **Obtain Certificate of Destruction**

Initiate Move Process ASAP Box D → **Maintain Retention Requirements via CHSPSC Document Retention Policy**

Responsibility Legend

FCO / Facility	FCO / Facility
FCO / Move Team	FCO / Move Team
Compliance / CCD	Compliance / CCD
Legal & Compliance	Legal & Compliance
Normal Operations	Normal Operations

See Definitions on Page 1

See Box References on Pages 2 & 3