

**EPIC MANAGEMENT, L.P.
BEAVER MEDICAL GROUP, L.P.
EPIC HEALTH PLAN**

**ADMINISTRATIVE POLICY AND PROCEDURE
COMPLIANCE**

SUBJECT: Compliance Program Records Retention	
DRAFTED BY: Sherry Miller, CCO	DATE: 8/17/2020
REVIEWED BY:	DATE:
REVISED BY:	DATE:
APPROVED BY: Compliance Committee	DATE: 8/17/2020
BOARD APPROVAL DATE: N/A	
EFFECTIVE DATE OF POLICY: 9/1/2020	

1. **PURPOSE:** This EPIC Compliance Program Records Retention Policy sets forth the retention requirements applicable to EPIC’s Compliance Program records.
2. **ATTACHMENTS:** Compliance Program Records Retention Schedule.
3. **DEFINITIONS:** All capitalized terms used but not defined in this Policy shall have the meaning attributed to them in the EPIC Compliance Program Definitions Policy.
4. **POLICY:** EPIC’s Compliance Department shall retain all records created, received, or maintained in connection with Compliance Program functions for a period of time that complies with applicable law, Federal Health Care Program requirements, contractual obligations with Federal Health Care Program payors, and the CIA.
5. **PROCEDURE:**
 - a. The Compliance Program Documents Retention Schedule attached to this Policy (“Retention Schedule”) sets forth EPIC’s retention requirements for records that are commonly created, received, and/or maintained by EPIC’s Compliance Department in connection with Compliance Program functions. All listed records shall be retained for the minimum retention period listed in the Retention Schedule (i.e., 10 years or 6 years, as applicable), one

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(1) year following the expiration or termination of the CIA, or the timeframe required by applicable law, whichever period is longest.

- b. All records not specifically listed in the Retention Schedule that are created, received, and/or maintained by EPIC's Compliance Department in connection with Compliance Program functions shall be retained for at least six (6) years, one (1) year following the expiration or termination of the CIA, or the timeframe required by applicable law, whichever period is longest.
- c. Notwithstanding the above, all Compliance Program records relevant to any ongoing government audit, litigation, internal or external investigation, or similar action shall be retained at least until the action has concluded.

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Compliance Program Records Retention Schedule

#	Record	Minimum Retention Period
1.	Certifications from Personnel that they have read, understand, and will comply with EPIC's Compliance Program Policies and Code of Conduct	6 years
2.	Code of Conduct	6 years
3.	Compliance certifications from Certifying Employees, as well as Non-Certification Explanations (if any)	6 years
4.	Compliance Committee meeting minutes	6 years
5.	Compliance Department communications with regulatory agencies (e.g., HHS-OIG, CMS)	10 years
6.	Compliance Program notices and updates	6 years
7.	Compliance Program Policies	6 years
8.	Conflict of Interest Attestation forms, as well as all other disclosures or documents relating to Conflicts of Interest and their resolution	6 years
9.	Corporate Compliance Officer correspondence (e.g., letters, memoranda) not already addressed in this Retention Schedule	6 years
10.	Disclosure Log and related review records	10 years
11.	Documentation of the Corporate Compliance Officer's reports to the Board, committees, and EPIC senior management	6 years
12.	Documentation pertaining to the identification, quantification, and return of Overpayments	10 years
13.	Exclusion screening results and related records	10 years
14.	Independent Review Organization ("IRO") Chart Review documentation (i.e., work papers, supporting documentation, correspondence, and draft reports exchanged between the IRO and EPIC for each Chart Review performed by the IRO)	6 years
15.	Internal investigation records (including final work papers and reports generated in connection with the internal investigation)	10 years
16.	Other CIA records (i.e., records pertaining to EPIC's compliance with the CIA requirements) that are not otherwise addressed in this Retention Schedule	6 years
17.	Records of corrective and/or disciplinary actions for Compliance Program violations	6 years
18.	Records of internal and external compliance	10 years

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#	Record	Minimum Retention Period
	monitoring, reviews, and audits	
19.	Risk Assessment and Internal Review Process (including copies of any work plans, internal audit reports, and corrective action plans)	10 years
20.	Training Plan	6 years
21.	Training records (including training materials and participation documentation)	6 years
22.	Notwithstanding the above, any of the above-referenced categories of records relating to Medicare Advantage members, Medicare Advantage plans, and/or the performance of services or obligations under contracts with Medicare Advantage Organizations or their delegates, shall be maintained as designated in this Row 22.	10 years from the final date of any relevant contract, or such longer period as required by applicable law or contract.