

Policy Title: Record Retention			
Department Responsible: THN Compliance & Integrity	Policy Number: RR-001	THN's Effective Date: January 1, 2022	Next Review/Revision Date: September 30, 2024
Title of Person Responsible: THN Director of Compliance & Privacy	THN Approval Council: THN Compliance and Privacy Committee	Date Approved: June 9, 2023	Date Approved by THN Board of Managers: August 15, 2023

- I. **Purpose.** The purpose of RR-001 is to provide (1) a statement of Triad HealthCare Network's (THN's) record retention policy and (2) procedures to ensure that THN's practices are consistent with its stated policies.

- II. **Policy.** It is the policy of THN to maintain all books, contracts, records, documents, and other evidence sufficient to enable the audit, evaluation, investigation, and inspection of THN's compliance with program requirements as required by the Accountable Care Organization Realizing Equity, Access and Community Health (ACO REACH) Model Participation Agreement (PA).

- III. **Procedure.**
 - A. THN requires all THN Related Individuals to maintain all books, contracts, records, documents, and other evidence (including data related to Medicare utilization and costs, quality performance measures, shared savings distributions, and other financial arrangements related to THN activities) sufficient to enable the audit, evaluation, inspection, or investigation of THN's compliance with the ACO REACH Model, the agreement signed with the Centers for Medicare & Medicaid Services (CMS), the quality of services furnished to Beneficiaries, THN's right to and distribution of Shared Savings, and all payments made or received pursuant to arrangements described in Section 3.04.G of the ACO REACH PA.
 1. THN will use the 4i application created and maintained by CMS to manage operations, automate business, and communicate with model participants.
 - a. Therefore, some THN and practice-level information will be recorded in 4i, but this should not be relied on as the only source for record retention.
 2. To obtain 4i access, you should reach out to someone at THN or your practice that already has an account.
 3. To login or for assistance, please visit <https://4innovation.cms.gov/landing>.



- B. Each ACO Participant is responsible for maintaining the records associated with their practice. THN is responsible for maintaining its own records.
- C. CMS, HHS, the Comptroller General, the Federal Government or their designees have the right to audit, inspect, investigate, and evaluate any books, contracts, records, documents, and other evidence of THN and any THN-Related Individual, in accordance with the ACO REACH PA.
- D. Data disclosed to THN pursuant to the HIPAA-Covered Data Disclosure Request Form may be retained by THN until the conclusion or termination of THN's participation in the ACO REACH Model. THN shall destroy all such data and send written certification of the destruction of the data files and/or any derivative data files to CMS within 30 days following the conclusion or termination of THN's participation.
 - 1. THN is permitted to retain any data that is incorporated into the subject Beneficiaries' medical records that are part of a designated record set under HIPAA.
- E. THN maintains records regarding the scope of outcomes-based contracts held by THN and/or its ACO Participants with non-Medicare purchasers.
- F. All such books, contracts, records, documents, and other evidence must be maintained for a period of 10 years from the final date of the agreement period or from the date of completion of any audit, evaluation, or inspection, whichever is later, unless:
 - 1. CMS determines there is a special need to retain a particular record or group of records for a longer period and notifies THN at least 30 calendar days before the normal disposition date; or
 - 2. There has been a termination, dispute or allegation of fraud or similar fault against THN or a THN-Related Individual, in which case THN must retain records for an additional 6 years from the date of any resulting final resolution of the termination, dispute or allegation of fraud or similar fault.

Date	Reviewed	Revised	Notes
January 1, 2022			Originally Published
August 2022	X		No changes
May 2023		X	Converted to REACH