

	Ethics & Compliance Department	
	Policy No.: 11	Created: 07/2015
		Reviewed: 05/2018
	Revised:	

DOCUMENT RETENTION

SCOPE:

Applies to all Envision Healthcare teammates. For purposes of this policy, all references to “teammate” or “teammates” include temporary, part-time and full-time employees, independent contractors, clinicians, officers and directors.

PURPOSE:

Envision Healthcare and its subsidiaries and affiliates (“Envision” or “the Company”) has adopted this Document Retention policy to aid in the maintenance of certain records relevant to our compliance efforts. This policy may be expanded in the future to include all Company documents.

POLICY:

All Company personnel, and contractors including suppliers and clinicians, must comply with the policies relating to the retention, distribution, storage, retrieval, and destruction of documents that are relevant to our compliance efforts. All documents relevant to our compliance efforts must be retained for a period of ten years. These documents must be accessible and must not be destroyed without prior supervisor approval or by following routine daily procedures.

PROCEDURE:

Type of Compliance Documents

- Patient charts and medical records;
- Billing statements, files, databases, claims, and provider enrollment documents;
- Correspondence, letters, subpoenas and search warrants from Medicaid and Medicare carriers, Department of Health and Human Services, Department of Justice, Centers for Medicare/Medicaid Services, Federal Bureau of Investigations, state and local government and healthcare agencies;
- Documents that support the Compliance Program policies and procedures such as education and training records, monitoring and auditing records, audit logs, helpline logs, disciplinary logs, exit interviews, reports of misconduct, etc.; and
- Internal billing and coding policies and procedures.

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Distribution of Documents

- All documents listed above must be protected and guarded as confidential. These documents will be distributed only to those persons that need the documents to perform their job responsibilities.
- All documents listed in lines 3 through 5 above must be copied or forwarded to the Compliance Officer as soon as reasonably possible.

Destruction of Documents

- All documents listed above may only be destroyed with supervisor approval or by following prior written routine policies of the company (see Record Retention Schedule).
- When destroying these documents, always use a shredder.

Storage of Documents

- Documents must be stored in a fire-proof and water-proof location. The location of these documents must be communicated to the Chief Compliance Officer (and a log must be maintained).

Retrieval of Documents

- All documents must be retrievable via electronic or hard copy.
- The hardware or software to access the documents must be available and usable.

POLICY REVIEW

The Ethics & Compliance Department will review and update this Policy, as necessary, in the normal course of its review of the Company’s Ethics & Compliance Program.

Retention Schedule

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
A. CORPORATE AND GENERAL		
<i>Incorporation and Reorganization:</i>		
a) Charter or certificate of incorporation and amendments.	Corporate Secretary/Legal Department	Permanent
b) Minutes of directors', executive committees', stockholders', and other corporate meetings.	Corporate Secretary/Legal Department	Permanent
<i>Titles and Authorities:</i>		
a) Deeds, licenses to do business, charters, and other title and related papers.	Legal Department	Permanent
b) Annual reports or statements to stockholders file copies.	Controller	Permanent
c) Business Acquisitions	Legal Department	Permanent
<i>Contracts and Agreements:</i>		
a) Service contracts, such as operational management, accounting, financial or legal service, and agreements with agents.	Legal Department	6 years after expiration or termination, then Legal department's approval required
b) Contracts and other agreements relating to the construction, acquisition, lease, or sale of real property and equipment.	Legal Department	6 years after expiration or termination and Legal Department's approval
c) Contracts with employees.	Human Resources/Regional Offices	Until expiration or termination plus three (3) years
d) Annual reports to governmental agencies.	Legal Department	Permanent
<i>Accountant's, Auditor's, and Inspector's Reports:</i>		
a) Certifications and reports of examination and audits conducted by certified public accountants.	Financial Reporting	Permanent
b) Reports of examinations and audits conducted by internal auditors and supporting detail.	Compliance and Internal Audit	10 years
c) External audit reports and workpapers	Applicable Department	Permanent
B. TREASURY		
<i>Capital Stock Records:</i>		
a) Capital stock ledger.	Chief Financial Officer/Legal Department	Permanent
b) Capital stock certificates, records or stubs. Note: If the information shown on the stubs is recorded in item (a) above, the stubs are required to be retained 3 years.	Chief Financial Officer/Legal Department	6 years
c) Stock transfer register.	Chief Financial Officer/Legal Department	Permanent
d) Memoranda and bills of sale or transfer of capital stock.	Chief Financial Officer/Legal Department	3 years
e) Capital stock subscription and requests for allotments.	Chief Financial Officer/Legal Department	1 year

Retention Schedule

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
<i>Long-Term Debt Records:</i>		
a) Bond indentures, underwriting mortgage, and other long-term credit agreements.	Treasury	3 years after redemption
b) Registered bond and debenture ledgers.	General Books	3 years after redemption
c) Stubs of similar records of bonds or other long-term debt issued.	Treasury	3 years after redemption
d) Records of interest paid and unpaid, and supporting statements.	General Books	5 years after tax return filing
e) Authorization schedules for premiums and discounts on long-term debt.	General Books	5 years after tax return filing
<i>Filings with an Authorization by Regulatory Agencies:</i>		
a) Authorizations from regulatory bodies for issuance of securities including applications, reports and supporting papers.	Chief Financial Officer/Legal Department	Permanent
b) Copies of registration statements and other data filed with the SEC and supporting papers in connection with offerings of securities for sale to the public or the listing of securities on an exchange.	Chief Financial Officer/Legal Department	Permanent
c) Records of securities owned, in treasury, or held by custodians, detailed ledgers and journals, or their equivalent.	Treasury	5 years after tax return filing for year the securities are sold, redeemed or otherwise disposed
d) Records of foreign exchange or commercial paper purchased.	Treasury	5 years after tax return filing for year sold
C. FINANCIAL AND ACCOUNTING		
<i>Ledgers:</i>		
a) General and subsidiary ledgers.	Financial Reports	Permanent
b) Annual financial statements.	Financial Report	Permanent
c) General Ledger accounts analyses and comments.	Applicable Department	5 years after tax return filing
d) Chart of accounts.	Financial Reports	Until superseded, then maintained with applicable G/L for 50 years
<i>Journals:</i>		
a) General Journal.	Financial Reports	50 years
b) Subsidiary journals and any supporting data, except as otherwise provided for, necessary to explain journal entries.	Financial Reports	5 years after tax return filing
c) Schedules of recurring or standard journal entries with entry identifications.	Financial Reports	With JE from same period prescribed for listed records
d) Journal entries and supporting detail.	Financial Reports	Same period prescribed for listed records
<i>Cash Books:</i>		
a) Cash subsidiary ledger.	Treasury	7 years after tax return filing
b) Cash disbursement and receipts journal.	Treasury	7 years after tax return filing
c) Bank statements and reconciliation.	Treasury	7 years after tax return filing
d) Canceled checks.	Treasury	Permanent for all important payments, taxes, purchases of

Retention Schedule

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
e) Cash transfers/disbursements.	Treasury	property, etc., otherwise 8 years after fiscal year
f) Cash receipts/Deposit slips.	Treasury	7 years after tax return filing
g) Credit card charge slips.	Treasury	7 years after tax return filing 3 years
Vouchers:		
a) Voucher register or A/P register.	Accounts Payable	5 years after tax return filing
b) Paid and canceled voucher, expenditure authorizations, detailed distribution sheets and other supporting data, including original bills and invoices, except as otherwise provided herein.	Accounts Payable	5 years after tax return filing
c) Paid drafts, paid checks, and receipts for cash paid out.	Treasury	5 years after tax return filing
Accounts Receivable:		
a) Record or register of accounts receivable, indexes thereto, and summaries of distribution.	Accounts Receivable	3 years after settlement
b) Bills issued for collection and supporting data.	Accounts Receivable	3 years after settlement
c) Reports and statements showing age and status of receivables.	Accounts Receivable	3 years
d) Authorizations for writing off receivables.	Accounts Receivable	5 years after tax return filing
e) Detail supporting bad debt estimates.	Accounts Receivable	3 years
D. PROPERTY ANDEQUIPMENT		
NOTE: All accounts, records, and memoranda necessary for making a complete analysis of the cost or value of property shall be retained for the periods shown. If any of the records elsewhere provided for in this schedule are of this character, they shall be retained for the periods shown below, regardless of any lesser retention period assigned.		
Property Records:		
a) Records that maintain complete information on cost or other value of all real personal property or equipment.	Corporate Tax	5 years after tax return filing for disposition
b) Records of additions and betterments made to property and equipment.	Corporate Tax	5 years after tax return filing for disposition
c) Records pertaining to retirements and replacements of property and equipment.	Corporate Tax	5 years after tax return filing for disposition
d) Records pertaining to depreciation.	Corporate Tax	5 years after tax return filing for disposition
e) Files of detailed authorizations for expenditures (AFE's), work or job orders showing estimated costs of additions and betterments, extensions, replacements, major repairs, and dismantlements, approved by proper officials, together with all supporting data.	Corporate Tax	5 years after tax return filing
f) Periodical inventories of property and equipment.	Corporate Tax	5 years after tax return filing
g) Computer hardware and software (internal and external developed) costs and amortizationschedules.	Information Technology	5 years after tax return filing for disposition

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
E. PERSONNEL AND PAYROLL		
<i>Personnel Records:</i>		
a) Applications for employment, service records, efficiency tests, qualification records, employee rosters, waivers, and other similar employee records.	Human Resources/Regional Offices	Term of employment plus 10 years
b) Applications for contract services, services records, qualification records, credentials for Professional Employment Contracts	Human Resources/Regional Offices	Until final deposition of the case Longer of 3 years from the date of hire or 1 year following termination
c) I-9 Forms. Where a charge of discrimination has been filed	Human Resources/Regional Offices	
d) Enrollment cards, beneficiary designations and distribution election forms for retirement plans.	Human Resources/Regional Offices	3 years for distribution to participants; indefinitely for distribution to a beneficiary.
e) Medical records, including questionnaires, examination reports, lab tests, opinions, diagnoses, complaints, and descriptions of treatments, except for health insurance claim records maintained separately from the employer's medical program and its records.	Human Resources/Regional Offices	Employees NOT subject to OSHA-3 years (6 years represents the outside statute of limitations period for most employer-employee related claims)
f) Applications for employment and replies thereto not resulting in employment of applicant.	Human Resources/Regional Offices	Employees subject to OSHA-Duration of employment plus 30 years (Federal and CA OSHA regulations require that medical records be retained for the duration of the employment plus 30 years for all employees who are exposed, or potentially exposed, to hazardous substances)
g) Files and records containing assignments, attachments, and garnishments of employees' salaries or wages, notice of suits, releases and correspondence incident thereto.	Payroll	
h) EEO-1 reports Vets 100 reports.	Human Resources	3 years after termination EEO-1: 2 years
i) Affirmative Action Reports.	Human Resources	Must maintain current and prior year's plan
j) Grievances filed by employees	Human Resources	

Retention Schedule

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
Concerning discrimination		Until final disposition
Disability		3 years
k) Requests for reasonable accommodations.	Human Resources	
<i>Payroll Records:</i>		
a) Earnings record cards.	Payroll	5 years after tax return filing
b) Registers, abstracts, or summaries showing earnings, deductions and amounts paid to each employee by pay period.	Payroll	Permanent
c) Records showing the detailed distribution of salaries and wages to various accounts.	Payroll	5 years after tax return filing
d) Records of annuities of pensions paid to retired employees and records of death benefits paid to beneficiaries of deceased employees.	Benefits	Permanent
e) Federal and State employment taxes withholding and payment.	Payroll	5 years after tax return filing
f) All records related to the administration and results of drug testing programs	Human Resources	Longer of duration of employment or 5 years.
g) Employee Deduction Authorizations.	Human Resources	2 years
h) Time Off and/or Sick Leave Requests	Human Resources	1 year
F. SAFETY		
a) Accident reports.	Human Resources	3 years after accident
G. INSURANCE AND CLAIMS		
<i>Insurance Records:</i>		
a) Records and files of fidelity bonds of employees and others responsible for funds.	Risk Management/Legal Department/Third Party Administrator	1 year after expiration of coverage
b) Records and files of Indemnity bonds incident to transportation and other charges.	Risk Management/Legal Department/Third Party Administrator	1 year after expiration of coverage
c) Inspectors' reports of conditions of insured property.	Risk Management/Legal Department/Third Party Administrator	Until superseded
d) Schedules of risks covered by self-insurance.	Risk Management/Legal Department/Third Party Administrator	Until superseded
e) Letter and telegraphic reports of damages by fire, collision, etc.	Risk Management/Legal Department/Third Party Administrator	2 years

Retention Schedule

RECORD DESCRIPTION	CUSTODIAN OFFICIAL	DESIGNATED RETENTION PERIOD
f) Reports of minor losses not covered by insurance or less than the minimum amount collectable.	Risk Management/Legal Department/Third Party Administrator	2 years
g) Schedules of hazard insurance and records of premium payments.	Risk Management/Legal Department/Third Party Administrator	3 years
h) Records of losses and recoveries from insurance companies and supporting papers.	Risk Management/Legal Department/Third Party Administrator	1 year after settlement
i) Insurance policies.	Risk Management/Legal Department/Third Party Administrator	1 year after expiration of coverage
Claim Records:		
a) Claims registers, card or book indexes, and other records which record personal injury, fire and other claims against the company, together with all supporting data.	Risk Management/Legal Department/Third Party Administrator	5 years after tax return filing for year of settlement
b) Claims registers, card or book indexes, and other records which record overcharge, damages, and other claims filed by the company against others, together with all supporting data.	Risk Management/Legal Department/Third Party Administrator	1 year after settlement
c) Reports, statements and other data pertaining to personal injuries or damage to property when not necessary to support claims or vouchers.	Risk Management/Legal Department/Third Party Administrator	3 years

H. TAXES

NOTE: Copies of returns and schedules filed with taxing authorities, supporting work papers, records of appeals, tax bills, and receipts for payments (see item C-4(b) for vouchers evidencing disbursements.

a) Income tax returns.	Corporate Tax	Permanent
b) Property tax returns.	Corporate Tax	Permanent
c) Sales and use taxes.	Corporate Tax	Permanent
d) Other taxes.	Corporate Tax	Permanent
e) Agreements between affiliated companies as to allocation of consolidated income taxes.	Corporate Tax	5 years after tax return filing for year of settlement
f) Schedule of allocation of consolidated federal income taxes among affiliated companies.	Corporate Tax	5 years after tax return filing for year of settlement
g) Records proving basis of any asset owned and still in possession.	Corporate Tax	5 years after tax return filing for year of disposal
h) Summaries of taxes paid.	Treasury	5 years after tax return filing
i) Filing with taxing authorities to qualify employee benefits plans.	Corporate Tax	3 years after settlement of tax return or discontinuance of plans, whichever is later

Retention Schedule

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j) Information returns and reports to taxing authorities.	Corporate Tax	3 years or for the period of any extensions granted for audits
I. REPORTS AND STATISTICS		
<i>Reports to Regulatory Bodies:</i>		
a) Periodical reports of operating revenues, expenses, and income file copies of, and supporting data.	Chief Financial Officer/Finance	3 years
b) Reports detailing use of proceeds from issuance or sale of company securities, file copy of, and supporting data.	Chief Financial Officer/Finance	3 years
c) Valuation inventory reports and records, together with related notes, maps and sketches; underlying engineering, land and accounting reports, pricing schedules, summary or collection sheets, yearly reports of changes and other miscellaneous data, all relating to the valuation of the company's property by any regulatory body.	Chief Financial Officer/Finance	3 years after disposition of the property
d) All other financial, operating, and statistical reports with supporting data.	Chief Financial Officer/Finance	3 years
J. PATIENT RECORDS		
a) Clinical and other medical records relating to health insurance claims and billing.	Reimbursement Technologies/Regions	7 years
b) Medicare/Medicaid/State Health Program Records	Reimbursement Technologies/Regions	7 years
Includes, but is not limited to:		
· Financial and statistical records; · Written policies and procedures regarding advance directives, if applicable;		
· Billing materials, such as system billing records, charge slips, other business and accounting records referring to specific claims;		
· Correspondence and telephone logs regarding contact with carrier or other government representatives regarding billing issues.		
c) CHAMPUS/TRICARE or other Medical Records of Veterans	Reimbursement Technologies/Regions	7 years

Retention Schedule

**RECORD
DESCRIPTION**

**CUSTODIAN
OFFICIAL**

**DESIGNATED
RETENTION PERIOD**

K. TRAINING MATERIALS

- | | | |
|---|------------|----------|
| a) Compliance program training certificates | Compliance | 10 years |
| b) Code of conduct forms | Compliance | 10 years |

L. MISCELLANEOUS

- | | | |
|---|---------------------------------|------------------|
| a) Destruction history files. | Corporate Accounting | Permanent |
| b) Corporate Policies and Procedures. | Human Resources | 10 years |
| c) General operations disaster recovery plan. | Information Services | Until superseded |
| d) Records providing compliance with environmental protection acts, OSHA, and other environmental laws, both state and federal. | Human Resources/Risk Management | Permanent |

M. INFORMATION SERVICES

- | | | |
|---|----------------------|--|
| a) All machine-sensible files in retrievable forms including programs and program changes. | Information Services | Same period prescribed for related records |
| b) EDP systems descriptions, system and program flowcharts, record formats, label descriptions, and user manuals. | Information Services | Until discontinued or updated |
| c) EDP disaster recovery plan. | Information Services | Until superseded |
| d) Documentation of any changes made to computer hardware, as well as complete description of the process/procedures needed to retrieve all old hardware files. | Information Services | Same period prescribed for related records |