



## Standard Operating Policies – SOP # 9 Compliance Office Records Management

<b>Title:</b>	<b>Compliance Office Records Management</b>	<b>Effective Date:</b>	<b>10/27/2003</b>
<b>Author:</b>	<b>Chief Compliance Officer</b>	<b>Last Review Date:</b>	<b>12/01/2021</b>
<b>Location:</b>	<b>All Locations</b>	<b>Last Revision Date:</b>	<b>12/01/2021</b>
<b>Functional Area:</b>	<b>ADMINISTRATION</b>		

### POLICY

All Liberty Compliance Program (Program) overview memoranda, reports and meeting minutes should be retained in order to maintain a record of Program operations. Records pertaining to a specific incident should be retained if a review or investigation is ongoing. Otherwise, all records should be destroyed on a periodic basis in accordance with SOP 15. During operations, the Chief Compliance Officer (CCO) receives and generates a substantial volume of records, documents and other information, in both electronic and hard copy format (hereinafter collectively referred to as “records”). This policy provides guidelines for the creation, distribution, retention, storage, retrieval and destruction of compliance documents and records, especially for the protection of the anonymity or confidentiality of individuals who report problems or concerns to the compliance office.

### PROCEDURE

#### 1. **Types of compliance documents and records.**

According to the OIG , compliance programs must create and maintain a formalized records management system that includes policies and procedures for the creation, distribution, retention, storage, retrieval and destruction of documents. The kind of information and activities that are noted in compliance records include:

- Documentation of employee training.
- Reports to and from the Employee Help Line.
- Results and nature of all investigations.
- Modifications to the compliance program.
- Self-disclosures.
- Results of auditing and monitoring efforts.

#### 2. **Compliance Office record management system.**

All Liberty compliance office records, including information created by and received by the office will be maintained in a secure area or securely online. Any electronic databases will also be protected by appropriate security measures. The CCO is responsible for maintaining security of the record management system in accordance with Liberty policies and procedures. Records will be kept secure and confidential to protect employee and patient privacy rights. Liberty documents and retains information about the compliance investigations and any conclusive findings in the personnel file of the respective Workforce member. This file is confidential and can only be viewed by authorized representatives of Liberty.

#### 3. **Communications with Government agencies.**

The Program Director/Manager/Supervisor at a Liberty program is responsible for documenting and retaining a record of all requests for information regarding payment policy from a government agency (CMS, etc.) and all written or oral responses received. Such records are critical if Liberty intends to rely on such responses to guide them in future decisions, actions, or claim reimbursement requests or appeals, while further underscoring Liberty’s commitment to compliance with the law.

**4. Retention of records.**

Liberty complies with record retention and documentation requirements under federal or state law for participation in federal health care programs, as well as the maintenance and retention of records and documentation necessary to confirm the effectiveness of the Program (e.g., Employee Help Line log, educational presentation overviews, handouts and attendance sheets, and documentation of ongoing auditing and monitoring efforts). All compliance records and information received by the Liberty Compliance Office or the Employee Help Line will be maintained in accordance with SOP 15.

**5. Mechanisms for record retention and destruction.**

A log system will be utilized to document the following steps in the records management process:

- Identification, control and maintenance of records;
- Retrieval/return of records to and from storage; and
- Destruction of records and deletion from storage.

The CCO will assure that correspondence, calendars, diaries, notepads; personal files, telephone message pads, chronological correspondence files and other similar materials will be part of a general review for determination as to record maintenance and destruction. Records generated and maintained in the information systems or equipment will also be part of the quarterly review to ensure that the policy requirements are applied to these documents.

Approved By: \_\_\_\_\_

### Revision History

Version	Date	Author	Summary of Changes
#1	10/27/2003	Judith Ann Shields	Initial ISF release – refactor and update of previous security policies into distinct documents
#2	08/20/2004	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#3	01/18/2005	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#4	12/22/2006	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#5	12/22/2007	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#6	12/22/2008	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#7	11/15/2009	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#8	8/20/2010	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#9	01/18/2011	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#10	12/22/2012	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#11	12/22/2013	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement

#12	12/22/2014	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#13	11/15/2015	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#14	08/20/2016	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#15	12/22/2017	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#16	12/22/2018	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#17	11/13/2019	Judith Ann Shields	Annual review, Attorney reviewed no changes. Added inactivity lock requirement
#18	11/03/2020	Judith Ann Shields	Annual review, Attorney reviewed © LHC, Author Title not name, Policy Title. Added inactivity lock requirement
#19	12/01/2021	John Beck	Annual review, removed former #5 on record retention since there is a separate policy on that and other minor changes. Added inactivity lock requirement