

TITLE: DATA RETENTION POLICY	
STATUS: FINAL	EFFECTIVE DATE: May 9, 2014
VERSION: 2	PAGE: 1 OF 3

I. POLICY

It is the policy of ClinicalConnect HIE to appropriately preserve all data of current or permanent value and retire data not warranting further preservation in accordance with applicable law or regulation, document preservation instructions, ethical considerations, fiscal requirements, and sound business practice.

II. DEFINITIONS

“Participant” is an organization (including physician practice) that has signed a Data Exchange Agreement with the ClinicalConnect HIE.

“Protected Health Information” or “PHI” shall have the same meaning as set forth in HIPAA.

III. SCOPE

This policy applies to ClinicalConnect HIE staff, Participants, and vendors.

IV. GUIDELINES

A. The following types of information shall be stored within the ClinicalConnect HIE:

1. Patient demographics
2. Protected Health Information (PHI)
3. Audit logs

B. ClinicalConnect HIE shall retain all demographic PHI sent from Participants for a minimum of ten years. Demographic PHI shall be maintained, inactivated, and “marked as deleted” to prevent inclusion in the Master Patient Index patient matching logic, but shall remain within the ClinicalConnect HIE database.

C. ClinicalConnect HIE shall retain all PHI sent from a Participant until new PHI becomes available from that Participant. For example, PHI sent from a Participant at the time of a patient’s discharge will be stored in the database until that same Participant sends new and/or additional PHI for that patient. For clarity, a patient’s problems, allergies, medications and immunizations updated by a Participant shall overwrite the data previously sent from that same Participant. Updated documents

and lab information shall overwrite the previously sent data from that same Participant, while new documents and new lab information shall append to the patient's record.

Data Sent By Participant A on 1/1/2013	CCD Received 2/1/2013 By	Resulting Action
Problems	Participant A	1/1 Problems are overwritten by 2/1 Problems
Allergies	Participant A	1/1 Allergies are overwritten by 2/1 Allergies
Medications	Participant A	1/1 Medications are overwritten by 2/1 Medications
Immunizations	Participant A	1/1 Immunizations are overwritten by 2/1 Immunizations
Labs	Participant A	1/1 Labs are overwritten if CCD contains updated Labs from 1/1; 2/1 Labs append to the 1/1 Labs if the 2/1 Labs are new
Documents	Participant A	1/1 Documents are overwritten if CCD contains updated Documents from 1/1; 2/1 Documents append to the 1/1 Documents if the 2/1 Documents are new
Problems	Participant B	2/1 Problems are appended to 1/1 Problems
Allergies	Participant B	2/1 Allergies are appended to 1/1 Allergies
Medications	Participant B	2/1 Medications are appended to 1/1 Medications
Immunizations	Participant B	2/1 Immunizations are appended to 1/1 Immunizations
Labs	Participant B	2/1 Labs append to the 1/1 Labs
Documents	Participant B	2/1 Documents append to the 1/1 Documents

- D. It is the responsibility of a Participant to document in its record the information from ClinicalConnect HIE that it uses to make clinical decisions.
- E. ClinicalConnect HIE shall retain all audit log data for a minimum of seven years.

I. Revision History

DATE	AUTHOR	COMMENTS
5/9/14	Jacqueline Smith	Creation of the policy
11/24/15	Erika Jones	Updated the template, changed from '6' to '7 years'
4/1/17	Keith Dukes	Reviewed Policy – No Changes