

Bethany Life Communities	Date Written: 2-24-2003	Date Revised: 5-1-2009
<i>Retention of PHI Documentation (HIPAA Privacy)</i>	Page 1 of 1	

Policy Statement

In accordance with current HIPAA regulations and guidelines, Bethany Life Communities will maintain all protected health information (PHI) documentation for a period of at least six (6) years from the date of its creation, or the date in which each document was last in effect, whichever is later.

Policy Interpretation and Implementation

1. The following documents have been classified as privacy-related documents and will be maintained for a period of at least six (6) years from the date of their creation, or the date in which each document was last in effect, whichever is later:
 - a. Documentation that identifies the:
 - i. Name, telephone number and address of Bethany Life Communities' HIPAA Compliance Officer;
 - ii. Attempts to obtain consent when consent could not be obtained and the reason(s) why such consent could not be obtained;
 - iii. Method in which PHI will be de-identified;
 - iv. Sanctions imposed against Bethany Life Communities team members, business associates, or other who violated Bethany Life Communities/HIPAA regulations;
 - b. All signed authorizations, consents, and agreed to restrictions;
 - c. Copies of all privacy notices, including any revisions to privacy notices;
 - d. Accounting of Disclosure Logs;
 - e. Any privacy complaints received and their disposition; and
 - f. Copies of all HIPAA related policies and procedures.
2. Documents may be added or deleted from the above listing as they become necessary by law or as may be established by Bethany Life Communities policy.
3. The HIPAA Compliance Officer, in coordination with the Director of Nursing, is responsible for identification and storage of privacy related records, electronic files, etc., to ensure the intent of this policy is met.