

Subject: <b>RECORDS MANAGEMENT</b>	Page: <b>1 of 42</b>	Policy # <b>NMHC ADM 01.0003</b>
Title: <b>RECORDS MANAGEMENT</b>	Revision of: <b>NEW NMHC</b>	Version: <b>1.0</b>
		Effective Date: <b>08/31/2011</b>
		Removal Date:

**I. PURPOSE:**

This policy provides standards for the orderly creation, retention and disposal of clinical and business records of Northwestern Memorial HealthCare (“NMHC”) and its affiliates and subsidiaries, whether in paper or electronic format.

**II. POLICY STATEMENT:**

- A. It is the policy of NMHC that NMHC personnel prepare and maintain complete, accurate, reliable and organized Records (as defined below), retain all Records for the periods prescribed on the Document Retention Schedule attached as [Appendix A – Document Retention Schedule](#) (the “Schedule”), and promptly and consistently dispose of all Records in accordance with NMHC policies and guidelines and when the applicable retention period is met.
- B. Each Record must be kept for the longest period applicable to it as specified in the Schedule in a manner that preserves its safety, security and integrity, and provides reasonable access to authorized NMHC personnel in need of such Record while preventing unauthorized access or disclosure.
- C. All Records shall be tracked and maintained in the ordinary course of business in a systematic and organized fashion.
- D. The Chief Records Executive has full authority and responsibility, either directly or through persons under his or her supervision, for the application and enforcement of this policy and the attached Schedule(s). He or she may delegate to others as consistent with good business practices. Each Manager also has responsibility to ensure that Records for his or her area are maintained and disposed of in compliance with this Policy. All employees, contractors and others acting on behalf of NMHC shall cooperate with the Chief Records Executive and/or his or her designee in carrying out his or her Records management responsibilities.

**III. PERSONS AFFECTED:**

This policy applies to all Individuals, as defined below. Each Individual is responsible for being familiar with this policy and any retention periods in the Schedule that apply to his or her job, contracted services, or other position.

#### **IV. DEFINITIONS:**

- A. **Chief Records Executive** – means that person or persons so appointed from time to time by the Chief Executive Officer. He or she shall have full responsibility and authority regarding enforcement of this policy.
- B. **NMHC Personnel**- means NMHC officers, employees, members of all medical staff, volunteers, agency personnel, consultants and contractors of NMHC
- C. **Legal Medical Record** - means the documentation of the healthcare services provided to an individual at NMHC. It is individually identifiable data, in any medium, collected and/or used in documenting healthcare or health status. The legal medical record does not include aggregate or derived data, and administrative or business records.
- D. **NMHC** – means Northwestern Memorial HealthCare and its affiliates and subsidiaries (e.g. Northwestern Memorial Hospital), as well as any entity in which NMHC or any of its subsidiaries has an ownership interest.
- E. **Informal Record** – means:
1. Record that does not support a conclusion or position taken by NMHC and has not been provided to or shared with a person or entity outside NMHC by authorized NMHC personnel (e.g. previous versions, list serve messages, published journals/government regulations, books);
  2. A business convenience Record that is not substantive in nature, but rather is merely incidental to the conduct of substantive business (e.g. the ordering of catering for a meeting, an invitation);
  3. A personal convenience Record that is personal in nature, such as an e-mail sent by an employee to a spouse or partner about family dinner plans.
- F. **Record** - includes all forms of communication in possession custody or control by NMHC Personnel, however created, recorded, produced or stored; and whether reduced to “hard copy” (such as paper or film), or which can be retrieved from electronic or other media (such as computer drives, disks, chips, PDA-type devices and accessories, thumb drives, card magnetic strips, etc.). Also included in the definition of Records are electronic mail, voice mail recordings, and other communications and electronic databases. Without limiting the generality of the foregoing, the term “Record” also includes all of the following:
1. Drafts, versions, notes, memoranda, reports, charts, spreadsheets, papers, calendars, schedules, pictures, images, sounds, data, data fields, copies, recordings, transcripts;
  2. Ingress, egress and surveillance data, including photographic, sound or access card data; and
  3. Metadata, embedded data, document properties, hidden data (including such things as hidden spreadsheet columns, notations, previous versions), associated data, other electronic properties or aspects of documents, whether or not visible or physically or electronically connected to, associated with or otherwise a part of a Record.

4. **Note:** two copies of a single Record that are different from one another in any respect whatsoever are considered two separate Records (e.g. two copies of the same meeting agenda with different handwritten notes on each).

- G. **Triggering Event** - includes (i) an indication that a Record may be required or desirable for the protection of NMHC, its assets or the operation of its business; and (ii) any actual, threatened or reasonably foreseeable legal proceeding, inquiry or investigation related to NMHC, including without limitation an actual, reasonably foreseeable, or seriously threatened: lawsuit, government, civil or criminal investigation, action, audit, inquiry or examination; administrative or regulatory action or investigation; subpoena; discovery request; or significant legal problem or dispute.

## V. **RESPONSIBILITIES:**

### A. Record Owner(s)

1. Records may have one or more owners. An individual is an owner of a Record if he/she is the creator, author, sender, recipient, or forwarder of the Record. Under this policy, all owners of a Record share responsibility for the management of that Record whether in electronic or paper form, or on another medium. If a Record Owner has a reasonable belief that the Record is being managed in accordance with this policy by the primary Record Owner, the non-primary owner is not required to retain an identical duplicate Record. If any changes have been made to the Record, however, the owner making the change must also retain the Record according to this policy.

### B. Organization of Records

1. Upon their creation, Records must be identified and maintained in such a manner to facilitate the ready retrieval of the Record for purposes of compliance with the maintenance and disposal requirement set forth in the Schedule. With regard to e-mails, this may entail, for instance, the sender or recipient moving the copy from the "sent items" or "inbox" folder to a more descriptive one based on the e-mail's particular characteristics. With regard to data files (e.g. Microsoft Word documents, memoranda, spreadsheets, or Power Point presentations), this could entail descriptive naming of the document in order to facilitate retrieval for purposes of determining when the document should be disposed of according to the Schedule.
2. Whenever practicable, Records (whether electronic or hard copy) of a similar kind or subject shall be kept together, either physically or on the same electronic storage medium.

### C. Conservative Maintenance

1. NMHC Personnel are to be conservative and inclusive in their approach to retaining Records, and to err on the side of caution. If any doubt exists as to whether a Triggering Event has occurred, whether this policy applies to a particular situation, or whether a particular Record is to be retained or disposed of, the individual should seek advice from his or her Manager. If that does not resolve the question, the individual or Manager should seek advice from the Chief Records Executive or

designee. If that does not resolve the question, the Chief Records Executive should seek advice from the Office of General Counsel.

D. Physical Security

1. Records shall be protected in a safe, secure, and where appropriate, locked place, to ensure their original character and integrity. Unauthorized persons shall have no access to such Records.

E. Document Retention Schedule

1. The length of time a Record shall be retained has been determined based on its character, content and purpose, as well as applicable law. The Schedule identifies different categories of Records and the length of time Records of each category shall be retained. If a Record falls into two or more categories, it shall be retained for the longest period applicable.
2. Informal Records need not be maintained for any specific time period, and NMHC Personnel may dispose of Informal Records at any time after he or she determines the informal usefulness of the Informal Record has expired. Note, however, that if the Informal Record is a type of electronic Record that is maintained in the NMHC vaulting system, the Record may still exist after it has been disposed of from his or her system. The disposal of Informal Records will be subject to periodic audits for compliance, and it is a violation of this policy to categorize a Record as an Informal Record and dispose of it as such in order to improperly shorten the retention period for such Record.
3. The retention periods in the Schedule may be changed from time to time, depending upon changes in applicable laws and/or the nature of NMHC operations. Only the Chief Records Executive or his/her designee shall have authority to change the Schedule.

F. Records Disposition

1. Records that are no longer required to be retained according to the Schedule are to be promptly disposed of. Further instruction and guidance on means of disposal of off-site Records for the NM-Chicago campus is set forth in "Procedures for Managing Off-site Records" in [Appendix B](#). These documents can also be found on NMConnect under Departmental Pages, Materials Management, and Records Management.
2. Selective disposal of Records is not permissible and is a violation of this policy.

G. Disaster Backup and Recovery

1. Although data on backup tapes are Records, disaster recovery backup tapes are not to be considered Records that are required to be retained and disposed of in accordance with the Schedule. Daily, weekly, monthly and/or annual data backup tapes will be overwritten routinely with new data, at the intervals specified by Information Services.

H. Suspension of Records Disposition

1. Whenever there is a Triggering Event (as defined above), disposal of relevant Records, as well as any alteration of such Records, must be immediately suspended. All NMHC Personnel share in the responsibility of properly maintaining the safety and security of such Records.
2. Any NMHC Personnel who receives information suggesting the occurrence of a Triggering Event shall immediately notify the Office of General Counsel. Upon receipt of such information, the Office of General Counsel shall immediately investigate and determine whether or not a Triggering Event has occurred. If so, the Office of General Counsel or its designee shall promptly issue a "Records Hold" directive to the appropriate NMHC Personnel, suspending the disposal and alteration of all Records relevant to the Triggering Event, pending further review.
3. **IMMEDIATELY UPON THE OCCURRENCE OF A TRIGGERING EVENT, ALL DISPOSAL AND ALTERATION OF RELEVANT RECORDS SHALL CEASE UNTIL THE OFFICE OF GENERAL COUNSEL LIFTS THE RECORDS HOLD DIRECTIVE.**
4. In addition, such Records shall be safeguarded throughout the duration of the "hold" period. All automated processes that result in disposition or alteration of relevant Records, such as automatic sweeps disposing of e-mails, shall, as appropriate for the particular Records Hold, be immediately halted and special care must be taken to ensure that such automatic processes remain inactive for the duration of the "hold" period.
5. During the "hold" period, the Office of General Counsel shall at the appropriate time or times make further judgments as to what Records are relevant, whether the suspension shall be continued, modified or augmented and, if possible, when it will be lifted. If and when the Office of General Counsel determines that the hold order is no longer warranted, or may be modified, it will so advise all NMHC Personnel involved in the matter.

I. Conflict with Other NMHC Policies

1. Every effort has been made to assure that this policy does not conflict with other policies of NMHC. In the event, however, that a situation arises in which there is an actual or perceived conflict or inconsistency among any NMHC or NMHC subsidiary policies, contact the Chief Records Executive or Office of General Counsel for further direction.

J. Specific Considerations Regarding Management of Electronic Records

1. Special Rules Regarding Management of Electronic Records

- a. When a workstation, laptop, PDA, BlackBerry, hard drive or other hardware is retired or assigned to a new user, the Manager of the department from which the hardware is being retired or reassigned is responsible for ensuring that the requirements of this policy with regard to Records are being complied with before any data or files of any kind are altered or removed. The Manager is also responsible for ensuring that all passwords and security access to the reassigned hardware is changed appropriately.
  - i. Likewise, upon the departure of any NMHC Personnel, the Manager of the department is responsible for ensuring on-going compliance with this

policy with regard to any Records that the departing NMHC Personnel possesses.

- b. When retiring a software application, Information Systems shall take appropriate measures to ensure that all associated Records are retained in a retrievable, usable format for the retention period associated with that Record.
- c. If the retention period for a particular electronic Record is more than three years and if the program that produced the Record is not widely available in NMHC (for example, a program other than Outlook, Word, Excel, PowerPoint, Adobe pdf), the Record owner must consult the Chief Records Executive or Information Services for instructions about the retention of that Record.
- d. NMHC Personnel who send electronic or paper Records offsite for storage are responsible for ensuring that such Records are properly retained and disposed of according to the terms of this Policy and the Schedule. For the NM-Chicago campus, the necessary steps to be taken to ensure compliance in such situations are set forth in “Procedures for Managing Off-site Records” in [Appendix B](#).

## 2. E-mail

- a. Sending or forwarding an e-mail is creation of a new Record, and because the sender loses control over the Record, it can be forwarded to an infinite number of additional recipients. Therefore, special care should be taken in connection with the creation of e-mails, as set forth in [Information Services Policy: E-mail](#).
- b. All sent and received e-mails may be automatically stored and maintained by Information Services in a centralized vaulting system. Although it will appear that an e-mail message is stored within the NMHC Personnel’s email system, the e-mail may be ultimately stored in the vaulting system’s archive. Individuals are unable to delete e-mail from the vaulting system— pressing “Delete” merely renders the e-mail inaccessible to the NMHC Personnel.
  - i. E-mails may be retained in the vaulting system for different periods of time depending on whether the user keeps the e-mail in the “Inbox” or “Sent Items” area in Outlook or in an individual folder in the “Folder” area of Outlook. Generally speaking, e-mails kept in the “Inbox” or “Sent Items” area in Outlook will be maintained by the vaulting system for a shorter period of time than e-mails which are moved to a folder in the “Folder” area in Outlook. Therefore, Informal Business Records as defined herein or other Records that do not fall in a category requiring longer retention than the period set for the “Inbox” or “Sent Items” areas can be kept in the “Inbox” or “Sent Items” areas. If an e-mail or attachment thereto constitutes a Record that falls within a category in the Schedule with a longer retention period than the retention period set forth for the “Inbox” or “Sent Items” areas, the e-mail must be moved to a folder in the Folder area. If an e-mail or attachment thereto constitutes a Record that falls within a category set forth in the Schedule that otherwise has a longer retention period than the standard e-mail retention period for the Folder Area, the Record Owner is responsible for ensuring that the Record is maintained for the longer time period. To do so, the NMHC Personnel must print the document in hard copy and place it in the appropriate file.

- ii. Information Services shall maintain all e-mail within the vaulting system as set forth in the Schedule.

### 3. Data Files

- a. All Microsoft Suite data files in “My Documents” (e.g. Microsoft Word documents, Excel spreadsheets, Power Point presentations) are, like e-mails, stored and maintained by Information Services in a centralized vaulting system. Although such a document will appear in the NMHC Personnel’s “My Documents,” depending on where it is saved by the individual, it is actually stored in the vaulting system. Information Services shall maintain all such data files within the vaulting system for the time set forth in the Schedule. Such data files cannot be deleted from the vaulting system.
- b. If a Microsoft Suite data file constitutes a Record that falls within a category set forth in the Schedule that otherwise has a longer retention period than the standard Microsoft Suite data file retention period, the Record Owner is responsible for ensuring that the Record is maintained for the longer time period. To do so, the individual must print the document in hard copy and place it in the appropriate file.
- c. If NMHC Personnel use form documents or templates that are frequently used in connection with multiple projects, the documents can be saved for longer periods than the normal period for data files set forth in the Schedule. Maintenance of such form or template documents shall be subject to periodic audit for compliance, and it is a violation of this policy to categorize non-form or non-template data files in such a manner as to improperly extend their retention period.

### K. Transport and Storage of Physical Media

1. Physical media pose security risks while being transported from one location to another or while in storage. These risks include loss, theft, and unauthorized disclosure, reducing NMHC’s ability to retain or dispose of this information. To reduce the risk associated with transport and storage, inventories of physical media that are periodically transported and stored will be maintained according to existing NMHC policy. Such transportation and storage practices will be subject to periodic audit to verify inventories so that incidents of loss and theft can be identified. Employees should be aware of risks in connection with transport and storage of physical media and should notify the Chief Records Executive if any discrepancy is noticed based on the inventory list.

### L. Audit and Violations

1. Information Services or the Chief Records Executive, or his or her designee, shall periodically audit retention and disposal of Records to monitor compliance with this Policy.
2. Any violation of this Policy or any procedures set forth in the Appendices or any efforts to circumvent established retention schedules will result in disciplinary action up to and including termination in accordance with the [\*Human Resources Policy: Rules for Personal Conduct\*](#) or other applicable rules, termination of contract, or other adverse action.

**VI. RELEVANT REGULATORY REFERENCE:**

None

**VII. POLICY UPDATE SCHEDULE:**

Every 5 years or more often, as appropriate

**VIII. REFERENCES:**

Record retention standards are set by various regulatory bodies including but not limited to:

- A. Federal Regulations dictated by Centers for Medicaid and Medicare (CMS CFR)
- B. Illinois Administrative Code Hospital Licensing Act
- C. Healthcare Insurance Portability and Accountability Act (HIPAA)
- D. Internal Revenue Service Code 501 (c)
- E. Securities and Exchange Act (17 CFR Part 210)

**IX. APPENDICES:**

[Appendix A – Document Retention Schedule](#)

[Appendix B: Procedures for Managing Off-site Records \(NM-Chicago campus\)](#)

- 1. Records Destruction
- 2. Records Storage & Retrieval
- 3. Example of Records Transfer/Control Log

[Appendix C: Special Considerations for E-mail](#)



**X. APPROVAL:**

Responsible Party: Marsha C. Liu  
Chief Integrity Executive

Reviewers: Office General Counsel  
Information Services  
Northwestern Memorial Physicians Group  
Northwestern Memorial Foundation  
Medical Records  
Quality  
Records Center  
Finance

Committees: NMHC Audit Committee, August 24, 2011

Approval Party: Dean Harrison  
President & CEO  
Northwestern Memorial HealthCare  
Electronic Approval: 08/31/2011

**XI. REVIEW HISTORY:**

Revised: 08/16/2011

Origination - Final Draft: February 23, 2009 – NMH 1.03ADM

**Appendix A – Document Retention Schedule**

Item #	Category	Records	Retention Period	Responsible Department*
1	Administrative	Annual Bed Report - Report to IDPH	11 Years	Community Relations
2	Administrative	Emergency Department On Call List	3 Years	Emergency Department
3	Administrative	Board Books Boards and Committees of the Board	Permanent	Governance
4	Administrative	Meeting Minutes Boards and Committees of the Board	Permanent	Governance
5	Administrative	Meeting Minutes Hospital Committees	Permanent	Governance
6	Administrative	Meeting Minutes Standing Committees of the Board	Permanent	Governance
7	Administrative	Presentations Boards and Committees of the Board	Permanent	Governance
8	Administrative	Meeting Minutes Departmental	4 Years	Individual Operational Areas
9	Administrative	External CEO Presentations	4 years then forward to Archives	Office of the CEO
10	Administrative	Patient Complaints/Problems	7 Years	Patient Representatives
11	Administrative	Certificate of Need	Permanent	Community Relations
12	Administrative	Organizational Charts	4 Years	Office of the CEO
13	Audits	Audit Reports, External	Permanent	Corporate Compliance and Integrity Finance Internal Audit
14	Audits	External Auditor's Management and CFO Letters	7 Years	Finance
15	Audits	Audit Work papers and Schedules	7 Years	Corporate Compliance and Integrity Finance Internal Audit
16	Audits	Federal Income Tax - IRS Audit Reports	Permanent	Finance

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
17	Audits	Audit Reports, Internal	7 Years	Internal Audit
18	Central Supply/ Purchasing/ Distribution	Autoclave Records	4 Years	Materials Management
19	Central Supply/ Purchasing/ Distribution	Inventory and Orders	8 Years	Materials Management
20	Central Supply/ Purchasing/ Distribution	Medical Device Tracking Records	Useful life of device + 6 Years	Materials Management
21	Central Supply/ Purchasing/ Distribution	Medical Equipment Logs	4 Years	Materials Management
22	Central Supply/ Purchasing/ Distribution	Notices/Memos	4 Years	Materials Management
23	Central Supply/ Purchasing/ Distribution	PCB Transformers	4 Years after disposal	Materials Management
24	Central Supply/ Purchasing/ Distribution	Purchasing Records	7 Years	Materials Management
25	Central Supply/ Purchasing/ Distribution	Returned Goods Documentation	4 Years	Materials Management
26	Central Supply/ Purchasing/ Distribution	Shipping/Receiving Records	4 Years	Materials Management
27	Central Supply/ Purchasing/ Distribution	Sterilizer Logs	4 Years	Materials Management
28	Claims and Litigation	Claims/Grievances - Professional Liability	11 Years	Legal
29	Claims and Litigation	Malpractice Claims	11 Years	Legal
30	Corporate Health	Employee Medical Record	Active plus 30 Years	Corporate Health

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
31	Dietary	Purchases, Food	30 Days	Food & Nutrition
32	Engineering	Equipment Documents (operating instructions, preventative maintenance, service schematics, etc.)	Life of equipment + 10 years	Biomedical Engineering
33	Engineering	Work Orders/Preventive Maintenance/Service Requests	4 Years	Safety Management or Individual Operational Area
34	Environmental Services	Exterminator Records	6 Years	Environmental Services
35	Environmental Services	Housekeeping Records (Including cleaning records and poundage report)	3 Years	Environmental Services
36	Finance	Accounts Payable Vouchers/Invoices	7 Years	Finance - Accounts Payable
37	Finance	Accounts Payable Ledgers and Schedules	7 Years	Finance - Accounts Payable
38	Finance	Accounts Payable All Other  Note - A sub-schedule exists, contact the operational area for details	7 Years	Finance - Accounts Payable
39	Finance	Check Register	7 Years	Finance - Accounts Payable
40	Finance	Check Register 1099 and 1096	7 Years	Finance - Accounts Payable
41	Finance	Expense Reports and associated paperwork	7 Years	Finance - Accounts Payable
42	Finance	Voucher for Payments to Vendors (Invoices)	7 Years	Finance - Accounts Payable
43	Finance	Insurance Precertification/Verification/Claim History	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Admitting and Registration

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
44	Finance	Budgets - Department Copies	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Budget Office
45	Finance	Corporate Budget Book	Permanent	Finance - Budget Office
46	Finance	Quarterly Budget Meeting Files	10 Years	Finance - Budget Office
47	Finance	Check Copies and Details	7 Years	Finance - Cash Application
48	Finance	Cash Journal Entry Summary	4 Years	Finance - Cash Management Operations
49	Finance	Cash Receipts (White Cashier Envelopes)	4 Years	Finance - Cash Management Operations
50	Finance	Charge Entry Reports  Note - A sub-schedule exists, contact the operational area for details	3 Years	Finance - Charge Entry
51	Finance	Charge Vouchers	3 Years	Finance - Charge Entry
52	Finance	Capital Property - Capital Expenditure Reports	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Construction Finance
53	Finance	Capital Property - Construction Accounting Reports	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Construction Finance

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
54	Finance	Plant Cost Ledgers	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Construction Finance
55	Finance	Loan Agreements and Letters of Credit	Life of Loan Agreement plus 4 Years	Finance - Corporate Finance
56	Finance	Corporate Debt	Final Maturity plus 4 Years	Finance - Corporate Finance
57	Finance	Credit Agency Reports	Final Maturity plus 4 Years	Finance - Corporate Finance
58	Finance	Promissory Notes	Final Maturity plus 11 Years	Finance - Corporate Finance
59	Finance	Charge Master	6 Years	Finance - Financial Planning and Reimbursement
60	Finance	Cost Report Appeals	15 Years after Medicare Appeal Determination	Finance - Financial Planning and Reimbursement
61	Finance	Cost Report Work papers	15 Years after final Cost Report completed	Finance - Financial Planning and Reimbursement
62	Finance	Cost Reports	15 Years after final Cost Report completed	Finance - Financial Planning and Reimbursement
63	Finance	Monthly Physician Time Studies	15 Years after final Cost Report completed	Finance - Financial Planning and Reimbursement

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
64	Finance	Planning - Financial Plans	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Financial Planning and Reimbursement
65	Finance	Planning - Forecasts	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance - Financial Planning and Reimbursement
66	Finance	Planning - Strategic Development Files	Permanent	Finance - Financial Planning and Reimbursement
67	Finance	SIA Reports	6 Years	Finance - Financial Planning and Reimbursement
68	Finance	Other Documents  Note - A sub-schedule exists, contact the operational area for details	7 Years	Finance - Fund Accounting
69	Finance	Account Reconciliations	7 Years	Finance - Fund Accounting
70	Finance	Fund Files	7 Years after final close-out	Finance - Fund Accounting
71	Finance	Journal Entries	7 Years	Finance - Fund Accounting
72	Finance	Research Agreements, Invoices, Trial Balances	7 Years after research conclusion	Finance - Fund Accounting
73	Finance	Financial Statements, Internal	15 Years	Finance - Fund Accounting Finance - General Accounting

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
74	Finance	Bank Documents (including but not limited to Deposits, Statements, Paid/Cleared Checks, Check Registries, Transaction Notes, Reconciliations, Wire Transfers)	7 Years	Finance - General Accounting
75	Finance	Internal Reports, Schedules and Records  Includes: - Other Accounting Reports - Physical Inventory Tags - Prepaid Expense Amortization Schedules	7 Years  NOTE: Reports should be carried as long as Financial Statements they support.	Finance - General Accounting
76	Finance	Account Reconciliations	7 Years	Finance - General Accounting
77	Finance	Accounting Journals and Ledgers	7 Years	Finance - General Accounting
78	Finance	Analytical Work papers	7 Years	Finance - General Accounting
79	Finance	Expense Analyses and Distribution Schedules	7 Years	Finance - General Accounting
80	Finance	Journal Entries	7 Years	Finance - General Accounting
81	Finance	Monthly Close Packets	7 Years	Finance - General Accounting
82	Finance	Credit Support Documents (Stand-by bond purchase agreements, etc.)	Life of Agreement plus 3 Years	Finance - Office of Investments
83	Finance	Due Diligence	7 Years	Finance - Office of Investments



<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
84	Finance	Quarterly Investment Data: External Manager Market Values, Performance, and Transactions	7 Years	Finance - Office of Investments
85	Finance	Unaudited and Audited Monthly External Manager Statements	7 Years	Finance - Office of Investments
86	Finance	Individual Patient Account Activity (PRIMES)	Permanent	Finance - Patient Accounting
87	Finance	Medicare Credit Balance Report (Report to FI quarterly)	7 Years	Finance - Patient Accounting
88	Finance	All EDI Reconciliation Files	7 Years	Finance - Payment Reconciliation and Refunds
89	Finance	Blue Cross Claim Summaries	7 Years	Finance - Payment Reconciliation and Refunds
90	Finance	Medicare Debit/Credit Adjustments	7 Years	Finance - Payment Reconciliation and Refunds
91	Finance	Patient Accounts Refunds	7 Years	Finance - Payment Reconciliation and Refunds
92	Finance	Refund Reports	7 Years	Finance - Payment Reconciliation and Refunds
93	Finance	Annual and Quarterly Tax Forms	7 Years	Finance - Payroll
94	Finance	Garnishment Accounting Records and Check Copies	7 Years	Finance - Payroll
95	Finance	Off-Cycle Check Copies and Records	7 Years	Finance - Payroll
96	Finance	On-Cycle Payroll Processing Items	7 Years	Finance - Payroll
97	Finance	Payroll Adjustment Forms	7 Years	Finance - Payroll
98	Finance	Salary Expense Detail Adjustment Records	7 Years	Finance - Payroll
99	Finance	Vendor Contracts and Vendor Check Copies	7 Years	Finance - Payroll

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
100	Finance	Account Reconciliations	7 Years	Finance - Revenue Accounting
101	Finance	Accounts Receivable Books	7 Years	Finance - Revenue Accounting
102	Finance	Analytical Work Papers	7 Years	Finance - Revenue Accounting
103	Finance	Cash Reports	7 Years	Finance - Revenue Accounting
104	Finance	DR/Employee Billing Records	7 Years	Finance - Revenue Accounting
105	Finance	Journal Entry Support	7 Years	Finance - Revenue Accounting
106	Finance	Month End System Reports	7 Years	Finance - Revenue Accounting
107	Finance	Other Monthly Close Work Papers	7 Years	Finance - Revenue Accounting
108	Finance	Bond Issue Documents  Note - A sub-schedule exists, contact the operational area for details	10 Years after bonds expire/retired	Finance - Tax Department
109	Finance	Unclaimed Property Reports (including Cash and Valuables and Credit Balances where owner cannot be located)	5 years after property is "reportable"	Finance - Tax Department
110	Finance	Community Benefit Reports	Permanent	Finance - Tax Department
111	Finance	Community Benefit Work Papers - E-mail Correspondence Folder	Permanent	Finance - Tax Department
112	Finance	Community Benefit Work Papers - Funding Surveys	Permanent	Finance - Tax Department
113	Finance	Correspondence with Tax Authorities	Permanent	Finance - Tax Department

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
114	Finance	Exemption Certificates - Federal	Permanent	Finance - Tax Department
115	Finance	Federal Income Tax – Protests/Appeals/Claims for Refunds	7 Years	Finance - Tax Department
116	Finance	FIN 48 Documentation (Audit Support)	Permanent	Finance - Tax Department
117	Finance	State Tax Exemption Letters	Permanent	Finance - Tax Department
118	Finance	State/Local Tax Returns and Records	7 Years	Finance - Tax Department
119	Finance	Tax Returns and Worksheets, accounts or records, including inventories	Permanent	Finance - Tax Department
120	Finance	Office Improvements	7 Years	Finance Property Operations
121	Finance	Office Layouts	4 Years	Finance Property Operations
122	Finance	Property Appraisals	7 Years	Finance Property Operations
123	Finance	Space Allocation Records	4 Years	Finance Property Operations
124	Finance	Acquisitions	7 Years after expiration of useful life	Finance Property Accounting
125	Finance	Capital Asset Records	7 Years after expiration of useful life	Finance Property Accounting
126	Finance	Capital Expenditure Receipts	7 Years after expiration of useful life	Finance Property Accounting
127	Finance	Depreciation Schedules	Permanent	Finance Property Accounting
128	Finance	Fixed Asset Schedules	Permanent	Finance Property Accounting
129	Finance	Material Transfer Files	10 Years after transfer	Finance Property Accounting
130	Finance	Mortgage Records	7 Years after audit	Finance Property Accounting

Item #	Category	Records	Retention Period	Responsible Department*
131	Finance	Private Use Surveys for Bond-financed Buildings	Final Maturity of bonds plus 4 years	Finance Property Accounting
132	Finance	Property Inventory	As long as electronic system is in use plus 10 years for selected records moved to new system	Finance Property Accounting
134	Grant Administration (Federal)	<p>Financial records, statistical records, and all other records pertinent to an award</p> <p>Records for real property and equipment acquired with federal funds</p> <p>Indirect cost rate computations or proposals, cost allocation plans, or any similar accounting computations of the rate at which a particular group of costs is chargeable (such as computer usage chargeback rates or composite fringe benefit rates)</p>	3 years after final disposition or date of submission	Finance - Fund Accounting
135	Human Resources	<p>Attendance Documents</p> <p>Basic Employment and Earning Records</p> <p>Garnishment Documents</p> <p>Wage Rate Tables</p> <p>Payroll Records</p> <p>Pay Scales</p> <p>Bonus Determinations</p>	Active plus 6 Years	Human Resources

Item #	Category	Records	Retention Period	Responsible Department*
136	Human Resources	Benefits Information including: <ul style="list-style-type: none"> <li>- Supporting Documentation for Reporting (e.g. Form 5500)</li> <li>- Welfare Plan Claim Forms and Claims for Benefits</li> <li>- Benefit Reports for Government Reporting</li> <li>- Benefit Tax Forms for Government Reporting</li> </ul>	Active plus 6 Years	Human Resources
137	Human Resources	Benefits Plans Including: <ul style="list-style-type: none"> <li>- 401(k) Retirement Plan</li> <li>- Disability Plan</li> <li>- Education Assistance Plan</li> <li>- Employee Relocation Program</li> <li>- Flexible Spending Account Plans</li> <li>- Group Life Insurance Plans</li> <li>- Health Insurance Plans</li> <li>- Profit Sharing Plans</li> <li>- Pension Plans</li> <li>- Incentive Plans</li> <li>- Seniority System</li> <li>- Merit System</li> <li>- Pension/401(k) Retirement Plan Vesting Files</li> </ul>	As long as the plan or system is in force plus 6 Years	Human Resources

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
138	Human Resources	Benefits Records including: - 401(k) Retirement Records - Actuarial Records - Beneficiary Designations - Profit Sharing Records	Active plus 6 Years	Human Resources
139	Human Resources	Benefits Records including: - Educational Assistance Financing - Employee Relocation Records - Group Life Insurance Records - Incentive Plan Records - PTO Records	Active plus 6 Years	Human Resources
140	Human Resources	Benefits Records/Claims Including: - Flexible Spending Accounts - Health Insurance Claims	Active plus 6 Years	Human Resources
141	Human Resources	Claims/Grievances - Employment Related	11 Years	Human Resources
142	Human Resources	Collective Bargaining Agreement, Individual Contracts under Fair Labor Standards Act	Active plus 6 Years	Human Resources
143	Human Resources	Education and Training Including: - Collateral Material to Support Training - Course Listings - Resultant Certification After Training	Once the Material is Superseded, Save for 6 Years	Human Resources

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
144	Human Resources	Education and Training HIPAA Privacy Training of workforce 45 CFR 164.530(b)(2)(ii)	6 Years from date of document creation or date when last in effect, whichever is later.	Human Resources
145	Human Resources	Employee PTO Plan	Active plus 6 Years	Human Resources
146	Human Resources	Employee Records Including:  - Employee Assistance Counseling Records  - Patient Records Under NMH-sponsored Welfare Benefit Plans	Active plus 6 Years	Human Resources
147	Human Resources	Government Reporting - Equal Employment Opportunity Forms	Active plus 6 Years	Human Resources
148	Human Resources	Occupational Noise Exposure Measurement Records	Active plus 6 Years	Human Resources
149	Human Resources	Pension Plan PBGC rate calculation information	Active plus 6 Years	Human Resources
150	Human Resources	Personnel Administration Including:  - Employee Grievances  - Layoff Records  - Promotion Records  - Retirement Records  - Transfer Records  - Scheduling Requests	Active plus 6 Years	Human Resources
151	Human Resources	Personnel Administration Including:  - Unemployment Compensation Documents	Active plus 6 Years	Human Resources

Item #	Category	Records	Retention Period	Responsible Department*
152	Human Resources	Personnel Files Including: - Employee Evaluations - Personnel Action Request Forms (PAF) - Temporary Employee Personnel Files - Terminated Employee Personnel Files (including Department Copy)	Active plus 6 Years	Human Resources
153	Human Resources	Personnel Selection, including: - Ads for Job Openings - Job Postings - Job Announcements - Applications/Resumes (Rejected) - Employment Requisition Files - Resumes (Solicited and Unsolicited) - Record of Physical Exam for employment - Results of Employer Administered Tests	Active plus 6 Years	Human Resources
154	Human Resources	Personnel Selection, including: - Criminal Records Requests (results and waiver)	Active plus 6 Years	Human Resources



<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
155	Human Resources	Personnel Selection, including:  - Verification of Employment Eligibility (INS Form I-9)	Active plus 6 Years	Human Resources
156	Human Resources	Policies/Procedures Including:  - Affirmative Action Plan  - Employee Manuals  - Job Descriptions and Performance Standards  - PHI protection	Current Version and Previous Versions for 10 Years After Retirement of the Version	Human Resources
157	Human Resources	Title VII and ADA personnel records	Active plus 6 Years	Human Resources
158	Human Resources	Workers' Compensation Documents	Active plus 6 Years or 3 Years from Date of Last Payment, Whichever is Longer	Human Resources
159	Human Resources	Workers' Compensation Documents - Related Exposure to radiologic materials or asbestos	Active plus 30 Years	Human Resources
160	Information Services	Access Security Records (Audit Trail Records)	6 Years from date of document creation or date when last in effect, whichever is later.	Information Services
161	Information Services	Disaster Recovery Plans - Computer Systems	11 Years	Information Services
162	Information Services	E-mails (Inbox Messages, Sent Messages, Deleted Messages)	1 Year	Information Services

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
163	Information Services	HIPAA - Documents Related to Security Standards	6 Years from date of document creation or date when last in effect, whichever is later.	Information Services
164	Information Services	Outlook Records (including calendars, tasks, e-mail moved into folders)	7 Years	Information Services
165	Information Services	Project Files	2 Years After Completion of Project	Information Services
166	Information Services	Telecommunication Reports	2 Years	Information Services
167	Insurance Administration	Actuarial Valuation Engagement Letters	7 Years	Insurance Administration
168	Insurance Administration	Annual Actuarial Valuation Report (Gen/Prof & WC)	7 Years	Insurance Administration
169	Insurance Administration	Claims Expense w/Detail and Other Intercompany Settlement	7 Years	Insurance Administration
170	Insurance Administration	Insurance - Fidelity Bonds	7 Years	Insurance Administration
171	Insurance Administration	Insurance - Insurance Claims	11 Years	Insurance Administration
172	Insurance Administration	Insurance - Insurance Reports & Analysis	4 Years	Insurance Administration
173	Insurance Administration	Insurance - Property Loss Reserves	4 Years	Insurance Administration
174	Insurance Administration	Insurance - Surety Bonds	Permanent	Insurance Administration
175	Insurance Administration	Insurance Contracts - Liability or Malpractice - Occurrence Policies	Permanent	Insurance Administration
176	Insurance Administration	Insurance Policies (current and expired)	10 Years after expiration	Insurance Administration
177	Insurance Administration	Monthly Claims Reconciliation (CMPPro and AP)	7 Years	Insurance Administration
178	Insurance Administration	Monthly Investment Manager Reports	7 Years	Insurance Administration
179	Insurance Administration	Monthly NMIC F/S from USA Risk	7 Years	Insurance Administration
180	Insurance Administration	Monthly NMIC Invoices to NMH and NMFF	7 Years	Insurance Administration
181	Insurance Administration	Monthly Self-insurance Funding Status	7 Years	Insurance Administration

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
182	Insurance Administration	Quarterly Actuarial Valuation Updates (Gen/Prof)	7 Years	Insurance Administration
183	Insurance Administration	Year-end Actuarial Valuation Update (WC)	7 Years	Insurance Administration
184	Laboratory	Laboratory Records	Laboratory Administration maintains the current retention periods.  Contact lab.	Laboratory Administration
185	Legal	Articles of Incorporation	Permanent	Legal
186	Legal	Bylaws (expired)	Permanent	Legal
187	Legal	Certificates of Incorporation	Permanent	Legal
188	Legal	Claims/Grievances (not otherwise categorized)	11 Years	Legal
189	Legal	Closing Documents	10 Years after expiration	Legal
190	Legal	Copyright Records	7 Years	Legal
191	Legal	Corporate Seals	Permanent	Legal
192	Legal	Final Judgments, Settlements, and Court Orders Court Case Files	11 Years	Legal
193	Legal	Hospital Bylaws	Permanent	Legal
194	Legal	Joint Venture Due Diligence	11 Years	Legal
195	Legal	Legal Opinions	11 Years	Legal
196	Legal	Limited Partnership Due Diligence	11 Years	Legal
197	Legal	Patents, Patent Applications, and Patent Agreements	7 Years	Legal
198	Legal	Trademark Records	7 Years	Legal
199	Managed Care	Insurance Plan Activity Analysis	7 Years	Finance - Managed Care
200	Marketing and Public/Community Relations	Advertising Campaigns	Permanent (Forward to Archives)	Marketing and Public Relations

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
201	Marketing and Public/Community Relations	Brochures and Publications	4 years then forward to Archives	Marketing and Public Relations
202	Marketing and Public/Community Relations	Community Relations Documents	4 years then forward to Archives	Marketing and Public Relations
203	Marketing and Public/Community Relations	Corporate Annual Reports	Permanent (Forward to Archives)	Marketing and Public Relations
204	Marketing and Public/Community Relations	Customer Lists	4 Years	Marketing and Public Relations
205	Marketing and Public/Community Relations	Customer Relations - Proposals – Pending	4 Years	Marketing and Public Relations
206	Marketing and Public/Community Relations	Marketing/ Public Relation Images - Film, Video, Negatives, Photos, etc.	Permanent (Forward to Archives)	Marketing and Public Relations
207	Marketing and Public/Community Relations	Newspaper Clippings	4 years then forward to Archives	Marketing and Public Relations
208	Marketing and Public/Community Relations	Planning - Market Research	4 years then forward to Archives	Marketing and Public Relations
209	Marketing and Public/Community Relations	Planning - Market Research Reports	4 years then forward to Archives	Marketing and Public Relations
210	Marketing and Public/Community Relations	Planning - Marketing Plans	4 years then forward to Archives	Marketing and Public Relations
211	Marketing and Public/Community Relations	Presentations	4 years then forward to Archives	Marketing and Public Relations
212	Marketing and Public/Community Relations	Promotional Materials	4 years then forward to Archives	Marketing and Public Relations

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
213	Marketing and Public/Community Relations	Publications referencing NM (staff and otherwise)	4 years then forward to Archives	Marketing and Public Relations
214	Materials Management	Business Associates Contracts	6 years from date of creation or date when last in effect, whichever is later	Materials Management
215	Materials Management	Contracts and Leases	10 Years after expiration	Materials Management
216	Materials Management	Warranties	11 Years	Materials Management
217	Medical Records	Birth Registration Worksheet (Worksheet from which Birth Certificate is prepared)	Permanent	Information Services - Medical Records
218	Medical Records	Diagnostic Images	5 Years	Information Services - Medical Records
219	Medical Records	Emergency Room - Transfers	Permanent	Information Services - Medical Records
220	Medical Records	Log - Emergency Room	5 years	Information Services - Medical Records
221	Medical Records	Log - Operating Room	10 years (12 years in case of litigation)	Information Services - Medical Records
222	Medical Records	Master Patient Index Disease Index Operative Index Physician Index	Permanent	Information Services - Medical Records
223	Medical Records	Patient Medical Documents (Individual Patient Medical Records)	Permanent	Information Services - Medical Records
224	Medical Records	Sexual Assault Survivor Emergency Treatment - Business and Professional Records	3 Years; if audit is initiated must retain until audit is completed.	Information Services - Medical Records

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
225	Medical Records	HIPAA - Documents Related to Uses and Disclosures of PHI	6 Years from date of document creation or date when last in effect, whichever is later.	Information Services - Privacy Executive
226	Medical Records	Log - Implant	10 years	Surgical Services Any Operational Area Responsible for Implants
227	Medical Staff	Medical Staff Bylaws, Rules and Regulations	Permanent	Medical Affairs
228	Medical Staff	Medical Staff Files	Permanent	Medical Affairs
229	Medical Staff	Medical Student Evaluations	4 Years	Medical Affairs
230	Medical Staff	Meeting Minutes - Medical Staff	Permanent	Medical Affairs
231	Medical Staff	Meeting Minutes of Executive Committee, Medical Staff and Medical Staff Committees referenced in the Committee Plan of the Medical Staff organizational documents	Permanent	Medical Affairs
232	Medical Staff	Resident Personnel Files	Permanent	Medical Affairs
233	Northwestern Memorial Foundation Planned Giving	Endowments, Trusts, Bequests	Permanent	Northwestern Memorial Foundation
234	Nursing/Patient Care	Student Schedules	8 Years after superseded	Human Resources
235	Nursing/Patient Care	Crash Cart Checklists	8 Years	Individual Operational Areas
236	Nursing/Patient Care	Staffing/Scheduling Documents	6 Years	Individual Operational Areas
237	Nursing/Patient Care	Census Reports	10 years	Information Services
238	Nursing/Patient Care	Daily Census	6 Years	Information Services
239	Nursing/Patient Care	Occupancy Report	7 Years	Information Services
240	Nursing/Patient Care	Operating Room Schedules	8 Years	Information Services

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
241	Nursing/Patient Care	Patient Classification Data	8 Years after superseded	Information Services
242	Nursing/Patient Care	Room/Bed Transfer Report	7 Years	Information Services
243	Nursing/Patient Care	Policies and Procedures	8 Years after superseded	Quality Administration
244	Nursing/Patient Care	Standards of Care, Practice (Includes daily assigned nursing personnel, average daily census) - Per each nursing unit	8 Years after superseded	Quality Administration
245	Nursing/Patient Care	Bereavement records	7 Years	Hospice
246	Nursing/Patient Care	Birth Records to Local Government	Permanent	Information Services - Medical Records
247	Office of Corporate Integrity	Compliance - Reports/Forms Submitted to Government or Government Contractor (including but not limited to responses to ADR, CERT, and OIG requests)	11 Years	Corporate Compliance and Integrity
248	Office of Corporate Integrity	Issue and Project Files	11 Years	Corporate Compliance and Integrity
249	Office of Corporate Integrity	OCR Complaints of HIPAA Violation and Response	6 years from date of creation or date when last in effect, whichever is later	Corporate Compliance and Integrity Information Services - Privacy Executive
250	Pastoral Services	Pastoral Visitation Log	5 years	Pastoral Care
251	Pharmacy	Medication Administration Documents	Permanent (as part of the Medical Record)	Information Services - Medical Records
252	Pharmacy	Log or Printout Verifying Prescription Refills For Schedule III and IV Controlled Substances	6 Years	Pharmacy
253	Pharmacy	Methadone Records	Permanent	Pharmacy
254	Pharmacy	Narcotics Receipts and Inventory	3 Years	Pharmacy

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
255	Pharmacy	Narcotics/Controlled Substances – Dispensed and Administered  (these records must be maintained separately from all other records)	4 Years	Pharmacy
256	Pharmacy	Patient Profiles	3 Years	Pharmacy
257	Pharmacy	Pharmaceutical Acquisition Order Forms	3 Years	Pharmacy
258	Pharmacy	Pharmacy Purchasing/Inventory Records	4 Years	Pharmacy
259	Pharmacy	Pharmacy Records - Alcohol (Tax Free) Inventory	7 Years	Pharmacy
260	Pharmacy	Pharmacy Register or Log or File of Prescriptions	6 Years	Pharmacy
261	Pharmacy	Prescriptions Dispensed (original) Division III Pharmacy	6 Years	Pharmacy
262	Pharmacy	Purchasing/Inventory	3 Years	Pharmacy
263	Pharmacy	Quality Control	6 Years	Pharmacy
264	Pharmacy	Recall Records	4 Years	Pharmacy
265	Pharmacy	Controlled Substances – Inventory and Orders	3 Years	Pharmacy
266	Pharmacy	Inspection Reports	6 Years	Pharmacy
267	Planning and Construction	Construction Project Files	11 Years	Facilities Planning and Construction
268	Planning and Construction	Drawings/Blueprints	Permanent (Forward to Archives)	Facilities Planning and Construction



<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
269	Planning and Construction	Zoning Permits	4 Years	Facilities Planning and Construction
270	Quality	Vaccine Adverse Event Report	11 Years	Corporate/Occupational Health
271	Quality	Infection Control Program Records	11 Years	Infection Control and Prevention
272	Quality	Quarterly Report of Patients with SCI or TBI	11 Years	Infection Control and Prevention
273	Quality	Accreditation Surveys and Reports	5 years After Next Accreditation is Issued	Quality Administration
274	Quality	Annual Reports to State Departments of Health	Permanent	Quality Administration
275	Quality	Communicable Disease Reports	6 Years	Quality Administration
276	Quality	Facility/Department Records – QC Reports	11 Years	Quality Administration
277	Quality	IDPH Inspection Reports and Orders (and Court Orders Reviewing IDPH Orders)	6 Years	Quality Administration
278	Quality	Mammography – Quality Assurance Documents	6 Years	Quality Administration
279	Quality	Medical Procedure Manuals	10 Years after version is Superseded	Quality Administration
280	Quality	Meeting Minutes - Quality Management Committee	10 years	Quality Administration
281	Quality	Orders, inspections - IDPH	6 Years	Quality Administration
282	Quality	Patient Care Policies and Procedures	8 Years after version is Superseded	Quality Administration
283	Quality	Permits/Licenses	Retain Until Expiration of Permit or License Plus 4 years	Quality Administration
284	Quality	Policies/Procedures - Policy Statements, Procedure Manuals, Table of Authorizations	8 Years after version is Superseded	Quality Administration
285	Quality	Quality Management Documents - Hospital Wide/Department Plan	Permanent	Quality Administration

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
286	Quality	Quality Management Documents - Reports, Quarterly and Annual	6 Years	Quality Administration
287	Quality	Quarterly and Annual Reports under the Hospital Report Card Act	11 Years	Quality Administration
288	Quality	Quarterly Report of Persons Sustaining Violent Injuries	11 Years	Quality Administration
289	Quality	Registration as a Carotid Stenting Facility under Medicare	11 Years	Quality Administration
290	Quality	Registration as a Mammography Facility	11 Years	Quality Administration
291	Quality	Registration as a Radiation Facility	11 Years	Quality Administration
292	Quality	Report of Induced Termination of Pregnancy - Report to IDPH	6 Years	Quality Administration
293	Radiation Safety	Calibration of Instruments Used to Measure the Activity of Unsealed Radioactive Material	4 Years	Safety Management / Diagnostic Imaging/Radiation Oncology
294	Radiation Safety	Calibration of radiation survey instruments, records	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
295	Radiation Safety	Education and Training Radiation Safety training and certification	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
296	Radiation Safety	Leak test results for sealed sources	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
297	Radiation Safety	Licensure for Medical Use of Radioactive Material	Duration of License + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
298	Radiation Safety	Licensure of Radioactive Material	Duration of License + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
299	Radiation Safety	Quarterly inventory of sealed sources	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
300	Radiation Safety	Radiation Equipment – Minor Maintenance	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
301	Radiation Safety	Radiation Installation (reports of class D radiation installations)	One inspection cycle + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
302	Radiation Safety	Radiation Protection Program, records of action taken	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
303	Radiation Safety	Radiation Safety Officer, agreement, duties	Duration of license + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
304	Radiation Safety	Radiation, Records of Visiting Authorized User	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
305	Radiation Safety	Radioactive byproduct material -- receiver transfers radioactive material	4 Years following transfer or disposal	Safety Management/ Diagnostic Imaging/Radiation Oncology
306	Radiation Safety	Radioactive byproduct material -- receiver disposes of radioactive material	Duration of License + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
307	Radiation Safety	Radiopharmaceuticals	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
308	Radiation Safety	Records of Dose to Members of the Public	Duration of License + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
309	Radiation Safety	Records of Individual Monitoring Results	Until Termination of License or Registration - then transfer records to the state	Safety Management/ Diagnostic Imaging/Radiation Oncology
310	Radiation Safety	Records of Planned Special Exposures	Until Termination of License or Registration - then transfer records to the state	Safety Management/ Diagnostic Imaging/Radiation Oncology
311	Radiation Safety	Records of Prior Occupational Dose	Until Termination of License or Registration - then transfer records to the state	Safety Management/ Diagnostic Imaging/Radiation Oncology
312	Radiation Safety	Records of Surveys and Calibrations	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
313	Radiation Safety	Records of Testing Entry Control Devices for Very High Radiation Areas	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
314	Radiation Safety	Records of the receipt, transfer, use, storage and disposal of all sources of radiation.	Duration of License + 4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
315	Radiation Safety	Records related to the operation of lasers	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
316	Radiation Safety	Teletherapy Spot Checks	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
317	Radiation Safety	Testing – Unsealed Sources	6 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
318	Radiation Safety	Alarm system and entrance control, records	4 Years	Safety Management/ Diagnostic Imaging/Radiation Oncology
319	Real Estate Services	Real Estate Transactions - Includes leases, deeds, easements, mortgages, titles, property improvement, property management	11 Years	Finance Property Operations
320	Records Center	Inventory of Records in Storage	Until Superseded + 10 Years	Records Center or Individual Operational Areas
321	Research Administration (Office of Research)	Applications to IRB at NU	4 Years after study has been completed	Office of Research
322	Research Administration (Office of Research)	Audit Reviews and Summaries of Chart Reviews related to Research	10 years	Office of Research
323	Research Administration (Office of Research)	Correspondence - IDE Correspondence with the fiscal intermediary	Permanent	Office of Research
324	Research Administration (Office of Research)	Research Account requests and Budget Forms with IRB approval letters and study consent forms	10 Years after study has been completed	Office of Research
325	Risk Management	Risk Management Reports	8 Years	Risk Management
326	Safety Management	Adverse events during use of approved medical devices	9 Years	Safety Management
327	Safety Management	Air Sampling and Bioassays	Active + 30 years	Safety Management
328	Safety Management	Dietary Records - Bacteriological Testing of Ice	4 Years	Safety Management

<b>Item #</b>	<b>Category</b>	<b>Records</b>	<b>Retention Period</b>	<b>Responsible Department*</b>
329	Safety Management	Education and Training Blood Borne Pathogens, OSHA	4 Years	Safety Management or Individual Operational Areas
330	Safety Management	Emergency Management Documents	11 Years	Safety Management or Individual Operational Areas
331	Safety Management	Employee Exposure to Toxic Materials Record  Occupational Exposure to Blood or Potentially Infectious Materials	Active plus 30 Years	Safety Management or Individual Operational Areas
332	Safety Management	Employee Medical Records - Hazardous Exposure	Active + 30 years	Safety Management or Individual Operational Areas
333	Safety Management	Employee Medical Records - Non Hazardous Exposure	Active + 30 years	Safety Management or Individual Operational Areas
334	Safety Management	Environmental Permits	4 Years	Safety Management or Individual Operational Areas
335	Safety Management	EPA Clean Air Reports, Illinois (includes records of all monitoring data and support information)	6 Years	Safety Management or Individual Operational Areas
336	Safety Management	Fire Investigation, Reports	6 Years	Safety Management or Individual Operational Areas
337	Safety Management	Hazard Communications Records	Active + 30 years	Safety Management or Individual Operational Areas
338	Safety Management	Inspection Reports, Surveys, Studies	3 Years	Safety Management or Individual Operational Areas
339	Safety Management	Inspections, Fire Safety Systems	3 Years	Safety Management or Individual Operational Areas
340	Safety Management	Inspections, grounds, building, etc.	3 Years	Safety Management or Individual Operational Areas
341	Safety Management	Material Safety Data Sheets	As long as it is in use + 10 years	Safety Management or Individual Operational Areas
342	Safety Management	Occupational Noise Exposure Measurement Records	3 Years	Safety Management or Individual Operational Areas

Item #	Category	Records	Retention Period	Responsible Department*
343	Safety Management	OSHA Records	6 Years	Safety Management or Individual Operational Areas
344	Safety Management	Safety Inspections	4 Years	Safety Management or Individual Operational Areas
345	Safety Management	Safety Investigations	6 Years	Safety Management or Individual Operational Areas
346	Safety Management	Safety Programs	4 Years	Safety Management or Individual Operational Areas
347	Safety Management	Safety Records	4 Years	Safety Management or Individual Operational Areas
348	Safety Management	Sterilizers/ Bacteriological Tests	4 Years	Safety Management or Individual Operational Areas
349	Safety Management	Waste Disposal - Biomedical Waste – Exception Form	4 Years	Safety Management or Individual Operational Areas
350	Safety Management	Waste Disposal - Biomedical Waste Records	4 Years	Safety Management or Individual Operational Areas
351	Security Services	Images - Security Camera Images, Still and Video, etc.	Video-90 days or longer if open investigation  Still images are kept 3years or longer	Security Services
352	Security Services	Reports	Permanent	Security Services
353	Security Services	Security Plans	11 Years	Security Services
354	Security Services	Tour Wand Patrols	3 Years	Security Services
355	Utilization Review	Utilization Management Reviews or Studies	4 Years	Case Management
356	Utilization Review	Utilization Review Plan	Permanent	Case Management

**\* For consolidated departments with local operations, contact your local representative for assistance in locating desired records and more specific procedural information on retention and destruction protocols.**

**APPENDIX: A**  
Document Retention Schedule

Marsha C. Liu  
Chief Records Executive

**Effective Date: 08/31/2011**

**REVIEW HISTORY:**

Revised: 08/16/2011

Origination - Final Draft: February 23, 2009

**Appendix B**  
**RECORDS DESTRUCTION PROCEDURE (NM-CHICAGO CAMPUS)**

1. Yearly, destruction reports will be sent to department managers that have records stored off-site.
2. The destruction report will list records that are eligible for destruction based on previous approvals and/or IHHA Reference.
3. For detailed information on those records that are eligible for destruction, please contact the Records Management Resource Coordinator.
4. The department manager is asked to review and approve the destruction. Once Records Management receives the approved destruction report, the records will be destroyed within two weeks.

FOR GENERAL QUESTIONS OR ASSISTANCE, PLEASE Contact the Records Management Resource Coordinator at 312/926-7842

**Appendix B****RECORDS STORAGE & RETRIEVAL PROCEDURE (NM-CHICAGO CAMPUS)**

1. Order records storage boxes (Stock #P500785) from OfficeMax link once you have logged onto NM Connect. Each box is approximately 10”H X 12”W X 15”D and holds approximately 1.2 cubic feet of records. This box can be used for both letter and legal size file folders. For cancelled checks, deposit slips, batches and timecards order stock #P500005 check boxes. **No other size box will be accepted for storage.**
2. File your records in **logical, systematic order** (alphabetically; by subject or records title; chronologically; or numerically). Do not over pack boxes. You should be able to place your hand safely between the folders. Files should be placed upright within the box with folder titles visible.
3. You will need one Bar Code Label per box and fill out a Records Transfer/Control log for up to 27 boxes. Contact The Records Management Resource Coordinator at 312/926-7842. The Records Transfer Log is available via email as an Excel file or on NM Connect. You will need to go the departmental pages and find Materials Management\Records Management.
4. Place the bar code label on the short side of the box beneath the handle cut out. **Do not** place bar code labels on the box top. (Note: bar code labels are absolutely necessary to identify the Records in storage). Records storage box numbers and labels are no longer used.
5. Complete the Records Transfer/Control Log. **Note: It is important that this form is filled out properly and completely – it serves as your document for indexing and retrieving boxes or files.** On the top section of the form, fill in the department name, cost center, sender, date sent, phone number, building, floor and room number, record title, and retention period (if known). In the Description section, enter the record/folder title(s) or file range, inclusive dates, and the box’s bar code number.
6. Records having permanent legal, administrative or historic value should be marked for **permanent retention** on the Records Control/Transfer Log for eventual transfer to the Archives.
7. Send a copy of the Records Transfer/Control Log as an email attachment to The Records Management Resource Coordinator. The box pick up will be scheduled at that time. **Make sure to retain a copy of all Records Transfer/Control Logs in a central location within your department or office so records or files are accessible to those authorized to request them from storage.**
8. To request boxes or files from offsite storage: fax (926-5897), e-mail or call The Records Management Resource Coordinator, unless you are authorized to order directly from O’Hare. You will need to provide the box or bar code number, specific file folder title, and delivery address (building, floor and room number). **Standard next day service will be used unless otherwise specified.**

FOR GENERAL QUESTIONS OR ASSISTANCE, PLEASE CONTACT Records Management Resource Coordinator AT 312/ 926-7842





## Appendix C

### SPECIAL CONSIDERATIONS FOR E-MAIL

Each individual must recognize that sending or forwarding an e-mail is creation of a new Record. At such time, the author loses control over that Record. It can then be forwarded by the initial recipients to an infinite number of additional recipients, each of whom can then give it further mass publication, and so on. E-mailing to a number of people can create copies of the Record on the e-mail server, network server, local archives and the hard drive of the sender and each recipient. From there, more copies may be saved to PDAs and home computers. Frequently, replies to e-mails create additional copies by incorporating a long thread of previous communications. In addition, the original e-mail (or successive components of the thread) that you send to a recipient at another organization may exist long after NMHC's Retention Schedule has called for the e-mail's disposal.

Each employee who sends or forwards an e-mail assumes personal responsibility for that Record. He or she must exercise great care, before clicking the send or forward button, to have assured the accuracy of the Record's contents, the propriety of authoring and sending, or forwarding it to its recipients, and the likelihood of it being replicated without his or her knowledge or consent. Always ask yourself these questions before clicking the button:

- Are you authorized to send this message on behalf of NMHC?
- Are you able to defend the statements made in that message (under oath, in court if necessary)?
- Are you able to justify sending the message to these particular recipients at this particular time?
- How would you and NMHC be affected if the message and your name appeared on the front page of tomorrow's newspapers?

**APPENDIX: C**  
Special Considerations for E-mail

Marsha C. Liu  
Chief Records Executive

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#### **REVIEW HISTORY:**

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