



<b>Policy Title:</b> Record Retention			
<b>Department Responsible:</b> THN Compliance and Privacy	<b>Policy Number:</b> THN-CP-125-1219-Record Retention	<b>THN's Effective Date:</b> 12/30/2019	<b>Next Review/Revision Date:</b> 12/30/2020
<b>Title of Person Responsible:</b> THN Compliance Officer	<b>THN Approval Council:</b>	<b>Date Approved:</b>	<b>Revision Approval Council:</b>

**PURPOSE:** To provide a statement of THN's record retention policy.

**DEFINITIONS:**

Term	Definition
THN Related Individuals	THN officers, directors, employees, Next Generation Participants, Next Generation Professional, Preferred provider, or any other individual or entity providing functions or services related to THN activities.
Beneficiary	An individual who is enrolled in Medicare and aligned to THN for a given Performance Year using the methodology set forth in Appendix B of the Next Generation ACO Model Participation Agreement and has not subsequently been excluded from the aligned population of THN.

**POLICY:**

1. It is the policy of THN to maintain all books, contracts, records, documents, and other evidence sufficient to enable the audit, evaluation, investigation, and inspection of the THN's compliance with program requirements as required by the Next Generation ACO Model Participation Agreement.

**PROCEDURE:**

1. THN requires all THN Related Individuals to maintain all books, contracts, records, documents and other evidence (including data related to Medicare utilization and costs, quality performance measures, shared savings distributions and other financial arrangements related to THN activities) sufficient to enable the audit, evaluation, inspection, or Medicare and Medicaid Services (CMS), the quality of services furnished to Beneficiaries, THN's right to and distribution of Shared Savings.
2. Each THN Participant is responsible for maintaining the records associated with their practice. THN is responsible for maintaining the records of THN.
3. CMS, DHHS, the Comptroller General, the Federal Government or their designees have the right to audit, inspect, investigate and evaluate any books, contracts, records, documents and other evidence of THN's and any THN related individual, in accordance with the participation in the Next Generation ACO Model.



4. Data disclosed to THN pursuant to the HIPAA-Covered Disclosure Attestation and Data Specification Worksheet may be retained by THN until the conclusion or termination of THN’s participation in the Next Generation ACO Model. THN shall destroy all such data and send written certification of the destruction of the data files and/or any derivative data files to CMS within 30 days following the conclusion of termination of THN’s participation.
  - a. THN is permitted to retain any data that is incorporated into the subject of Beneficiaries’ medical records that are part of a designated record set under HIPAA.
  
5. Documentation: All such books, contracts, records, documents, and other evidence must be maintained for a period of ten years from the final date of the agreement period or from the date of completion of any audit, evaluation, or inspection, whichever is later, unless:
  - a. CMS determines there is a special need to retain a particular record or group of records for a longer period and notifies THN at least 30 calendar days before the normal disposition date; or
  - b. There has been a termination, dispute or allegation of fraud or similar fault against THN or a THN Related Individual, in which case THN must retain records for an additional six years from the date of any resulting final resolution of the termination, dispute, or allegation of fraud or similar fault.

**REFERENCE DOCUMENTS/LINKS:**

**COMMITTEE APPROVAL:**

**PREVIOUS REVISION/REVIEW DATES:**

Date	Reviewed	Revised	Notes