

BJC HEALTHCARE ACCOUNTABLE CARE ORGANIZATION POLICY

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| APPLIES TO: | BJC HealthCare Accountable Care Organization |
| TITLE: | BJC HealthCare Accountable Care Organization Retention of Records Policy |
| NUMBER: | No. 6 |
| PURPOSE: | To ensure that BJC HealthCare Accountable Care Organization appropriately retains and destroys medical and business records in accordance with applicable laws, regulations, and BJC policies. |

I. Statement of Policy

It is the policy of the BJC HealthCare Accountable Care Organization ("BJC ACO") to comply with all applicable state and federal laws and regulations. This policy is intended to supplement the ACO's Compliance Plan and policies by providing specific guidance regarding the retention and destruction of medical and business records.

II. Scope of Policy

The policy applies to the BJC ACO and all BJC ACO Participants.

III. Policy Statement and Procedures

All ACO members must retain and destroy medical and financial records in accordance with all applicable federal and state laws and regulations, BJC Corporate Compliance Policies and internal policies. Each ACO is required to retain all books, contracts, records, documents and other evidence for 10 years from the final date of the agreement period or from the date of completion of any audit unless a determination is made that the records need to be retained for a longer period of time. In addition, each ACO must comply with any additional retention and destruction policies in place in the respective ACO

IV. Responsibility of All BJC Employees and all Employees of ACO

All ACO participants and their respective employees or agents are responsible for being aware of, and complying with ACO policies and procedures. Questions or issues regarding the policies shall be directed to the ACO Compliance Officer.

V. ACO Compliance Officer Review, Approval and Assistance

Any exception, change or deviation from this Policy must be reviewed and approved by the ACO Compliance Officer. The ACO Compliance Officer is available to answer any questions and to provide assistance and advice to ACO members concerning this Policy.

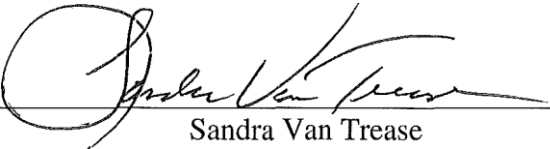
RECOMMENDED BY: BJC HealthCare ACO Board of Managers

EFFECTIVE DATE: May 2012 (Original)

REVISED DATE: January 1, 2020

REVIEWED: January 30, 2020

AUTHORIZED BY: Sandra Van Trease


Sandra Van Trease
President BJC HealthCare ACO