



<b>Policy and Procedure No: QM 15.7</b>		<b>Revision No: 7</b>
<b>Division: Care Management</b>		
<b>Department: Quality Management</b>		
<b>Title: PHC-CA Record Retention and Document Management</b>		
<b>Effective Date: 5/28/2014</b>		
<b>Supersedes Policy No: 97010, QM 15.0, QM 15.1, QM 15.2, QM 15.3, QM 15.4, QM 15.5, QM 15.6</b>		
<b>Reviewed/Revised by: Sandra Holzner</b>		<b>Review/Revision Date: 12/10/2025</b>
<b>Approving Committee: Quality Management Committee</b>		<b>Date: 12/11/2025</b>
<b>Executive Oversight Committee Date: 12/16/2025</b>		

## Purpose:

This policy establishes the framework under which official records and documents of how PHC California (the Health Plan) are created and managed. It lists the responsibilities of staff and the principles for the processes outlined in the records and document management guidelines. The intent of this Policy is to ensure that the Health Plan's business areas have the appropriate governance and supporting structure and resources in place to enable them to manage records and documents in a manner that is planned, controlled, monitored, recorded, and audited, using an authorized system. This Policy supports the key strategic and operational requirements for adequate recordkeeping and document management throughout the Health Plan to ensure that the business needs for evidence, accountability, and information about how the Health Plan's activities are met.

## Policy:

The Health Plan meets the DHCS contract requirements to retain records for a minimum of ten (10) years from the final date of the DHCS contract period, or from the date of completion of any audit, whichever is later, in accordance with 42 CFR sections 438.3(h) and (u) and 438.230(c) and make the records available for audit or inspection, per Exhibit E Program Terms and Conditions, Provision 1.1.22, Sub Provision (A) and (B).

The Health Plan meets the Knox-Keene Act and Title 28 requirements to maintain records for a period of not less than five (5) years, the last two (2) years of which shall be in an easily accessible place at the offices of the plan.

This Policy is applicable to all staff of the Health Plan and to all official corporate records and documents, in any format and from any source. Examples include paper, electronic messages, digital documents and records, video, DVD, web-based content, plans, and maps. This Policy does not apply to public domain material or data held within business systems such as the Health Plan's core business applications (e.g., Centricity Practice Solution). Records and documents created, received, or used by Health Plan staff in the normal course of business are the property of the Health Plan, unless otherwise agreed. This includes reports compiled by external consultants commissioned by the Health Plan.

The Health Plan's official records constitute its corporate memory, and as such are a vital asset for ongoing operations, and for providing evidence of business activities and transactions. They assist the Health Plan in making better informed decisions and improving business practice by providing an accurate record of what has occurred before. Therefore, records are to be:

- Managed in a consistent and structured manner;

- Managed in accordance with Health Plan guidelines and procedures;
- Stored in a secure manner in accordance with Information Technology Access and Security policies;
- Disposed of or permanently archived in accordance with state and federal requirements;
- Captured and registered using the authorized recordkeeping system.

Documents are to be:

- Created by authorized personnel and managed in the central and controlled repository of the Health Plan (i.e., shared drive), and
- Version-controlled by authorized personnel in accordance with Information Technology Access and Security policies.

### **Procedure:**

#### Responsibility

1. The Chief of Care Management and/or Department Director are responsible for records management and have delegated responsibility for records management other than financial records across the Health Plan. Financial records are maintained by the Finance Department under the direction of the Chief Financial Officer.
2. The Department Director (or designee) is accountable for providing business areas with assistance in the overall management of records and documents, including:
  - a. Oversight of the Health Plan's recordkeeping and document management
  - b. Providing assistance to business areas with the implementation and interpretation of the records and document management.
  - c. Maintaining and developing Health Plan policy and promulgating this to the business areas.
  - d. Identifying retention and disposal requirements for operational and administrative records (e.g., clinical records, paper claims, credentialing, and peer review materials).
  - e. Providing training in records and document management processes.

#### Recordkeeping and Document Management

1. The Health Plan's recordkeeping and document management system assists Health Plan staff to capture records, protect their integrity and authenticity, provide access through time, dispose of records no longer required by the Health Plan in the conduct of its business, and ensure records of enduring value are retained. It also facilitates the creation, version control, and authority of official corporate documents.

2. The Health Plan's recordkeeping and document management system is managed by respective Department, which provides ongoing support, development, and training to business areas, so that the Health Plan's legislative, business and community responsibilities are met (e.g., Member Services, Contracting, and Quality Management).
3. The Health Plan's authorized recordkeeping and document management system:
  - a. Captures official records and documents, which are subjected to the relevant retention and disposal authority;
  - b. Provides access to records and documents managed according to authorized access and appropriate retention times regardless of location;
  - c. Protects records and documents from unauthorized alteration or deletion;
  - d. Includes a version control function as required;
  - e. Includes one authoritative and primary source of information documenting the Health Plan's decisions and actions (e.g., quality subcommittees, UM (Utilization Management) program documents, policies, and procedures).
4. All staff within the Health Plan who create, receive, and keep records and documents as part of their daily work, should do so in accordance with established policies, procedures, and standards.
5. Staff should not undertake disposal of records without authority and only in accordance with authorized disposal schedules.

**Definitions:**

1. Document: Structured units of information recorded in any format and on any medium and managed as discrete units or objects. Some documents are records because they have participated in a business transaction or were created to document such a transaction. Conversely, some documents are not records because they do not function as evidence of a business transaction.
2. Email: The transmission of text messages and optional file attachments over a network.
3. Records: Information created, received, and maintained as evidence and information by an Health Plan or person, in pursuance of legal obligations or in the transaction of business.

**Monitoring:**

1. The Policy is updated, as necessary, reviewed and approved annually by the Quality Improvement and Health Equity Committee (QIHEC).

**Reference(s):**

1. Quality Policy and Procedure PHC-CA Member Health Record