

UTHSCSA Graduate Medical Education Policies

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|--|---|-----------------|---|
| Section 2                                | General Policies & Procedures   | Effective:      | March 2007                                    |
|  |   | Revised:        |   |
| Policy 2.1.19.                           | Records Retention in GME Programs   | Responsibility: | Associate Dean for Graduate Medical Education |
| <b>Records Retention in GME Programs</b> |   |                 |   |
| Purpose                                  | GME programs produce many documents in the process of administration of the programs and in the training and education of their residents and fellows. The purpose of this policy is to provide guidance to the programs and their leadership regarding retention of those records.   |                 |   |
| Policy                                   | <p>It is the policy of UTHSCSA to assign minimum record retention times, as determined by the nature of the particular documents, institutional policy, and by government code.</p> <p>The UTHSCSA Records Retention Schedule is located at <a href="http://www.library.uthscsa.edu/university/records.cfm">http://www.library.uthscsa.edu/university/records.cfm</a> and serves as an institutional resource for this policy.</p> <p>Records may not be destroyed if any litigation, claim, negotiation, audit, open records request, administrative review, or other action involving the record is initiated before the expiration of a retention period for the record or in the approved records retention schedule until the completion of the action and the resolution of all issues that arise from it, or until the expiration of the retention period, whichever is later.</p> <p>For GME purposes, the academic year is defined as <u>July through June</u>.</p> <p>Programs are advised to adopt written policies for the program's document retention. These policies may include longer retention times than outlined below.</p> <p>Overview of retention schedule, by general categories of records:</p> <ol style="list-style-type: none"> <li>1. <u>Applications to GME program</u> – materials collected as part of the selection process. <ol style="list-style-type: none"> <li>a. Applicants who are selected for the GME program will have these materials moved into their individual personnel files (see below).</li> <li>b. Files for those applicants who were not selected/matched may be destroyed one year after the end of the academic year in which application is made. Thus, for an application made during the 2006-2007 year, records can be destroyed at end of June, 2008.</li> </ol> </li> <li>2. <u>Individual trainee's file</u> – created beginning at the time of</li> </ol> |                 |   |

## UTHSCSA Graduate Medical Education Policies

enrollment in the GME program, continues through the duration of the program.

- a. These files contain evaluations, licenses, certificates, and other materials related to the education and training of the individual resident.
  - b. Formative and summative evaluations
    - i. **Formative evaluations** - created during the periods of training. These must be retained throughout the duration of the individual's training, and may then be deleted.
    - ii. **Summative evaluations** - created as 'final' evaluations, upon completion of a significant educational component, often a year of training) in paper and/or electronic forms should be retained for at least 5 years after the individual has completed the program (or left the program for other reasons).
  - c. Other evaluations
    - i. **360° Evaluations** – including peer and student evaluations, patient evaluations, patients' family members evaluations, evaluations completed by other providers, etc. These evaluations, which are generally formative in nature, should be de-identified.
    - ii. **Final Evaluation** - The final evaluation is prepared by the program director at the end of the training program, and addresses the resident's performance during the final period of education and should verify that the resident has demonstrated sufficient professional ability to practice competently and independently in that specialty. The final evaluation must be part of the resident's permanent record maintained by the institution.
3. Assignments, schedules – information regarding rotations, used in creation of IRIS report. These records (paper and electronic) should be retained for ten years after the end of the fiscal year, in order to provide primary verification of rotations in the event of a Medicare audit of prior training years.
  4. Program-specific Policies and Procedures – these policies, typically collected as Program Policies, and addressing such matters as resident selection and appointment, evaluation, moonlighting, supervision, etc., which are specific to the program, and which are distributed to trainees and faculty, should be retained until they are superseded, plus 3 years.
  5. Accreditation records – all records related to ACGME accreditation, including correspondence, letters of notification, citations, progress reports, etc. Correspondence with the GME

## UTHSCSA Graduate Medical Education Policies

Committee, action plans, minutes from annual reviews of program effectiveness, and other similar materials are included in this category.

UTHSCSA Graduate Medical Education Policies

| Record Series Item Number               | ID  | Dept   | Records Series Title  | Retention | Security | Archival | Medium | Vital | Remarks   |
|---|-----|--------|---|-----------|----------|----------|--------|-------|---|
| <b>Administrative Records - General</b> |     |        |   |           |          |          |        |       |   |
| 1.1                                     | 489 | DE     | Accreditation Records - Residency Programs.   | PM        | C        |          | P, E   |       | The Accreditation Council for Graduate Medical Education (ACGME) maintains a permanent list of citations for each program and carefully reviews programs in that area at each accreditation. Includes correspondence to and from accrediting agency, Program Information Form (PIF) for each site visit, program requirements by year, internal reviews by GMEC (Graduate Medical Education Committee) and correspondence by GMEC regarding internal reviews, action plans developed to correct citations, correspondence with GMEC regarding action plans, residents' evaluations of rotations, and minutes of annual review of program effectiveness. |
| 3.1                                     | 389 | DE     | Individual Trainee's File – MD/DO/Residents/Fellows. Includes licenses, certifications, training certificates, evaluations, and anything else of value in responding to requests for credentialing or verification. | AC+5, AV  | C        |          | P, E   |       | AC = Separation date. All documents should be kept for 5 years after separation from UTHSCSA. Documents needed in verification or credentialing may then be kept for as long as they are deemed administratively valuable. The FINAL LETTER should be kept permanently.   |
| 3.3.020                                 | 109 | DE     | Work schedules/block schedules/assignments. Work, duty, shift, crew, or case schedules, rosters, or assignments.  | FE + 10   | O        |          | P, E   |       | Paper schedules and electronic schedules should be retained in the event of a Medicare audit for 10 years after FE.   |
| 3.3.024                                 | 174 | HR, DE | Personnel Policies and Procedures. Any internally distributed manuals, guidelines, or similar records that define program policies and procedures   | US+3      | O        |          | P, E   |       | Paper and electronic versions are kept.   |

## UTHSCSA Graduate Medical Education Policies

| <b>Student Records - Other</b>   |     |    |   |  |   |   |      |  |  |
|--|-----|----|---|--|---|---|------|--|--|
|  | 408 | DE | Residency & Fellowship Program<br><b>Application Information.</b> AAMC Electronic Residency Application Service (ERAS) documents including common application form, photographs, letters of recommendation, USMLE certified transcript scores, Dean's letter, graduate transcripts, personal statements, ECFMG documents for foreign medical graduates. | AC+1   | C |   | P, E |  | AC = end of academic year in which application is made. Records for residencies are downloaded from ERAS and kept electronically |
| <b>RETENTION CODES</b> (For Field 7)   |     |    |   | <b>MEDIUM CODES</b> (For Field 10)   |   | <b>ARCHIVAL CODES</b> (For Field 9)   |      | <b>SECURITY CODES</b> (For Field 8)  |  |
| <b>AC</b> - After Closed, Terminated, Completed, Expired, Settled<br><b>AV</b> - Admin Value<br><b>CE</b> - Calendar Year End<br><b>FE</b> - Fiscal Year End |     |    |   | <b>LA</b> - Life of Asset<br><b>MO</b> - Months<br><b>PM</b> - Permanent<br><b>US</b> - Until Superseded |   | <b>P</b> - Paper<br><b>M</b> - Microfilm<br><b>E</b> - Electronic<br><b>O</b> - Other (Specify in Field 12) |      | <b>A</b> - Transfer to State Archives<br><b>I</b> - Retain in University<br><b>R</b> - Review by University<br><b>O</b> - Other (Specify in Field 12)  |  |
|  |     |    |   |  |   |   |      | <b>O</b> - Open Record<br><b>C</b> - Confidential<br><b>VITAL CODE</b> (For Field 11)<br><b>X</b> - Record Series is considered vital to ongoing agency. Records identified as vital are to be safeguarded by routine maintenance of off-site back-up. |  |