

POLICY/PROCEDURE TITLE	Document Retention Policy of Non-Patient Medical Records		
POLICY/PROCEDURE NUMBER	CC-126		
DEPARTMENT	Compliance		
Original Issue Date	9/22/2022		
Next Scheduled Review Date	6/26/2025		
Last Review Date	07/10/2024		
Revision Date History	3/2023 added SNYO and WA DPP; 6/2023 revised applicability; 9/2023 patient medical records moved to separate policy; 7/2024 added electronic equipment, updated form.		
APPLIES TO			
<input checked="" type="checkbox"/>	SAP: ReachOut Healthcare America Ltd. dba Smile America Partners	<input checked="" type="checkbox"/>	MI: Michigan Dental Outreach, P.C. dba Michigan Dental Outreach
<input checked="" type="checkbox"/>	AZ: Arizona Mobile Dental, PC dba Big Smiles	<input checked="" type="checkbox"/>	MO: Nevin K. Waters D.D.S., P.C. dba Big Smiles
<input checked="" type="checkbox"/>	CA: Elliot Paul Schlang, DDS, Professional Corporation dba Big Smiles	<input checked="" type="checkbox"/>	NC: Theodore F. Mayer, DDS P.A. dba Smile North Carolina
<input checked="" type="checkbox"/>	GA: Shurett Dental Group, P.C. dba Shurett Dental Group	<input checked="" type="checkbox"/>	NY: Big Smiles Dental New York, PLLC
<input checked="" type="checkbox"/>	GA: Mark Shurett, DDS, PC dba Help A Child Smile	<input checked="" type="checkbox"/>	NY: Smile New York Outreach, LLC
<input checked="" type="checkbox"/>	IL: Elliot P. Schlang, D.D.S. P.C. dba Smile Illinois	<input checked="" type="checkbox"/>	OH: Elliot P. Schlang DDS, Dental Outreach PLLC dba Ohio Dental Outreach
<input checked="" type="checkbox"/>	IN: Elliot P. Schlang DDS, Dental Outreach PLLC dba Indiana Dental Outreach	<input checked="" type="checkbox"/>	PA: Big Smiles Pennsylvania P.C. dba Smile Pennsylvania
<input checked="" type="checkbox"/>	KS: Nevin K. Waters D.D.S., PA dba Big Smiles	<input checked="" type="checkbox"/>	UT: Big Smiles Utah, P.C. dba Big Smiles
<input checked="" type="checkbox"/>	KY: Big Smiles Kentucky PSC dba Big Smiles	<input checked="" type="checkbox"/>	VA: Big Smiles Virginia PC dba Smile Virginia
<input checked="" type="checkbox"/>	MA: Elliot P. Schlang DDS Big Smiles Massachusetts P.C. dba Smile Massachusetts	<input checked="" type="checkbox"/>	WA: Michael LaCorte Dentistry, PC dba Big Smiles
<input checked="" type="checkbox"/>	MD: S.K. Pesis D.D.S., Big Smiles Maryland, PC dba Smile Maryland	<input checked="" type="checkbox"/>	WV: Elliot P. Schlang DDS, Inc. dba Smile West Virginia

I. PURPOSE:

This policy represents ReachOut Healthcare America, LTD d/b/a Smile America Partners (“SAP”) and its affiliated Dental Professional Practices (“DPPs”) (hereinafter collectively referred to as “The Smile Way Group”) policy regarding the retention and disposal of records, the retention and disposal of electronic documents, and the disposal of applicable electronic equipment. The purpose of this policy is to ensure that necessary records and documents of are adequately protected and maintained and to ensure that records that are no longer needed by The Smile Way Group or are of no value are discarded at the proper time.

II. ADMINISTRATION:

The Corporate Compliance Committee is responsible for overseeing this policy. Any changes to this policy must be approved by the Corporate Compliance Committee.

Attached as Appendix A is a Record Retention Schedule that is approved as the initial maintenance, retention and disposal schedule for records of The Smile Way Group.

The Department Administrator identified in Appendix A is in charge of the administration of this policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Department Administrator will ensure that it is in compliance with local, state and federal laws and includes the appropriate document and record categories; monitor local, state and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy. Records approved for destruction will be shredded onsite or given to an approved BAA vendor specializing in document destruction.

A certificate of destruction is attached in Appendix B and should be given to the Chief Compliance Officer to be retained permanently.

III. SUSPENSION OF RECORD DISPOSAL IN EVENT OF LITIGATION OR CLAIMS:

In the event The Smile Way Group is served with any subpoena or request for documents or any employee becomes aware of a governmental investigation or audit concerning The Smile Way Group or the commencement of any litigation against or concerning The Smile Way Group, such employee shall inform the Compliance Officer and any further disposal of documents or applicable electronic equipment shall be suspended until such time as the Compliance Officer, with the advice of counsel, determines otherwise. The Compliance Officer shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

IV. APPLICABILITY:

This policy applies to all physical records generated or received by the Company, including original documents and reproductions and applicable electronic equipment. Under the Company's current document retention policy, electronic data and records saved on the Corporate network are retained indefinitely.

Non-Patient Medical Documents:

Under this policy, imaging of non-patient medical documents constitutes document retention therefore, when original non-patient medical documents are imaged and retained on the Company network, the original "hard copy" documents may be destroyed immediately. Documents per designated record set or PHI /PII require a certificate of destruction. All other physical non-patient medical documents not imaged will be retained in accordance with Appendix A and destroyed after their minimum retention period in accordance with this policy. Records must be destroyed in a manner that allows for no chance of reconstruction of information.

Patient Medical Records:

Under this policy both physical and imaged patient medical records are retained in accordance with CCC - 128 Destruction of Protected Health Information Policy.

Electronic Equipment:

End-of-life electronic equipment will be destroyed under current IT policy. This includes items such as laptops, hard drives, flash/thumb drives and other storage devices.

V. STORAGE PROCEDURES:

All storage boxes must be logged before being placed in storage in accordance with company procedure. All requests for information from off-site storage must be coordinated in accordance with company procedure.

VI. DESTRUCTION PROCESS:

For records in paper form, shredding, burning, pulping, or pulverizing the records so that the content is rendered essentially unreadable, indecipherable, and otherwise cannot be reconstructed may be considered for disposal. Destruction may be conducted internally utilizing a shredding machine or utilizing a vendor contracted as a Business Associate to destroy and dispose of paper records which are rendered unreadable, indecipherable, and otherwise cannot be reconstructed. A certificate of destruction must be obtained by the approved vendor containing the patient's identification number, the date of destruction

and the vendor. A certificate of destruction should be given to the Chief Compliance Officer to be retained permanently.

Approvals:

DocuSigned by:
Steve Higginbotham 7/23/2024
9F2E17E4D88A41A
Steve Higginbotham, CEO

DocuSigned by:
Craig Thomas 7/23/2024
068E7D1B7A624EC
Craig Thomas, CCO & SVP HR

APPENDIX A – DOCUMENT RETENTION SCHEDULE FOR NON-PATIENT RECORDS

Documents/records not mentioned below should be identified to the Corporate Compliance Committee before any action is taken.

A. ACCOUNTING AND FINANCE

Department Administrator: Corporate Controller

<u>Record Type</u>	<u>Minimum Retention Period</u>
1. Accounts payable records (excluding invoices)	7 years
2. Accounts payable Invoices	3 years
3. Audited annual reports	Permanently
4. Bank statements (monthly)	3 years
5. Capital asset records (including depreciation)	Permanently
6. Cash receipts and deposit records	3 years
7. Contracts and leases (expired)	7 years after expiration
8. Deeds, mortgages & bills of sale	Permanently
9. Financial Packages, Board Decks, etc.	Permanently
10. General ledger Trial Balances	Permanently
11. Income tax returns, worksheets and related documentation	Permanently
12. Insurance policies (expired)	3 years after expiration
13. Insurance records, current accident reports, claims, etc.	Permanently
14. Inventory of products, materials & supplies	7 years
15. Petty cash vouchers and records	3 years
16. Retirement plan records (documents, investment records, allocations)	Permanently
17. Tax Files	7 years

B. EMPLOYMENT RECORDS

Department Administrator: Corporate Controller

<u>Record Type</u>	<u>Minimum Retention Period</u>
1. Applications (not hired)	3 years
2. Personnel records (after termination)	7 years
3. Payroll records, taxes & summaries	7 years
4. Time sheets, cards or time clock	7 years
5. Training manuals	7 years
6. Workman compensation records	7 years

C. COMPLIANCE DOCUMENTS

Department Administrator: Chief Compliance Officer

<u>Record Type</u>	<u>Minimum Retention Period</u>
1. Lobbying & Political Documents	7 years
2. Compliance Training	10 years
3. Code of Conduct	10 years

D. OTHER DOCUMENTS

Department Administrator: Corporate Controller

<u>Record Type</u>	<u>Minimum Retention Period</u>
1. Accident reports/claims (settled cases)	7 years

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|---|--|
| 2. Controlled substance copy | 2 years |
| 3. Correspondence, routine with patients or vendors | 2 years |
| 4. Correspondence (legal or important) | Permanently |
| 5. Legal agreements (partnership, associateship) | Permanently |
| 6. Litigation | Permanently |
| 7. OSHA records (log and summary) | 5 years past the year to which it pertains |
| 8. Daysheets, schedule | 7 years |
| 9. Patient billing/payment or fee statements | 7 years |
| 10. Third-party insurance claims, records & correspondence (EOBs) | 7 years |

E. ELECTRONIC EQUIPMENT

Department Administrator: VP of IT

<u>Record Type</u>	<u>Minimum Retention Period</u>
1. Computers/laptops/hard drives/thumb or flash drives	no minimum period

APPENDIX B – CERTIFICATE OF DESTRUCTION

CERTIFICATE OF DESTRUCTION

The Smile Way Group

The information described below was destroyed in the normal course of business pursuant to The Smile Way Group's retention policies and procedures, and/or written agreement. If records are destroyed by a vendor, the Department Administrator must attach their paperwork to this form. This form must be submitted to the Chief Compliance Officer to retain this certificate permanently.

Description of information destroyed/disposed (or Noted in Attachment):

Type of Record

Paper Electronic X-ray Films Other: _____

Media Information

Make/Vendor: _____ Model Number: _____

Serial #/Property #(s): _____

Media Type: _____ Source (i.e., user name): _____

Data Classification: _____

Data Backed Up? Unknown No Yes, list location: _____

Method of Destruction

If PAPER: Shredding Other: _____

If ELECTRONIC: Secure Wiping/Overwriting Destruct Other: _____

Person Performing Sanitization - Attestation that the information provided on this certificate of destruction is accurate to the best of my knowledge.

Name/Title: _____

Organization/Location: _____

Signature: _____ Date: _____

Validation

Name/Title: _____

Organization/Location: _____

Signature: _____ Date: _____