



**Series:** 1100 Information Technology

**Policy:** 1115

**Policy Name:** Documentation and Retention

**Regulations:** 45 C.F.R 164.316, CCKids 1108

**Origination Date:** 7/8/2022

**Revision Date:**

**Policy:** This policy is designed to give guidance and ensure compliance with provisions of federal and state HIPAA regulations requiring covered entities to maintain documentation of policies, procedures, and other administrative documents in accordance with 45 C.F.R. §164.316.

**Procedure:** Communities Connected for Kids (CCKids) policies and procedures ensure system back-ups with respect to electronic protected health information, which are designed to comply with the standards, implementation specifications, or other requirements of the HIPAA Security regulations.

1. CCKids will maintain (1) documentation, in electronic form, of policies, procedures, communications, and other administrative documents as required by 45 C.F.R. §164.316(i) and (ii); and (2) all electronic Protected Health Information (PHI) records for a minimum of 7 years, or the time required under law, depending upon local, state and federal laws and requirements, whichever is longer.
2. Records will be held beyond the minimum retention period when there is litigation, threatened litigation or anticipated litigation in a particular case.
3. CCKids will incorporate into its policies, procedures and other administrative documents any changes in law.
4. CCKids will properly document and implement any changes to policies and procedures as necessary by changes in law.
5. CCKids will decide what addressable implementation specifications are reasonable and appropriate based on size, complexity, and capabilities, as well as technical infrastructure, hardware, and software security capabilities, cost, and risk analysis.
6. CCKids will implement addressable implementation specifications determined to be reasonable and appropriate.
7. CCKids will document all addressable specifications, including both implemented as well as non-implemented specifications. If the addressable specification is not implemented, the document will list the reason(s) why the specification was not implemented.
8. The following events necessitate an update of one or more security documents (specific to systems protecting electronic protected health information):
  - Update of applicable regulations, laws, standards, or other mandates
  - Change in system configuration
  - Change in operating environment (to include threat, vulnerability and risk assessment findings)
  - Change in organizational structure
  - New or changed requirement resulting from a business associate contract

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Date: 7/27/2022

Carol Deloach, CEO