



COMBINED POLICY, PROCESS & PROCEDURE DOCUMENT

POLICY: Healthcare Record Retention

POLICY NUMBER: COM-08

POLICY OWNER: Compliance Officer

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POLICY STATUS: Final

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REVISION AND APPROVAL HISTORY

Revision History

Version	Date	Author	Revision Notes
1.0	6/18/2020	Outside Counsel	Initial draft of policy

Approval History

Approver	Title	Date	Signature
Lexie Conway	CO	5/26/2021	Lexie Conway

Review History

Review Date	Reviewer	Review Comments

I. PURPOSE

The purpose of this policy is to define what a record is and provide guidelines on how long to retain records and how to properly dispose of records. Unless you formally receive an exception in writing from the Legal Department, or a written directive from the Legal Department, you must retain a record according to schedule below. See the attached record retention schedule for more information. For the avoidance of doubt, this policy applies to all Insight Global, LLC (“Insight Global” or the “Company”) employees, directors, management, and individuals contracted by the Company to provide staffing support or related services directly to Insight Global customers (collectively, “Personnel”).

II. DEFINITIONS

Healthcare Records – For purposes of this policy, the term Record(s) means all information that is created, received and/or maintained by Insight Global and contains customer, customer patient, or Company business information. All Records are the exclusive property of Insight Global and are not property of any individual Custodian, as defined below.

This policy covers Healthcare Records in all electronic and tangible forms, including but not limited to:

- Electronically stored information (e.g., contractor requisitions, job descriptions, employee on-boarding files, weekly timesheets, expense reports, customer invoices and email)
- Customer contracts

Non-Records – Information that contains no essential business, customer, or customer patient information is considered a non-record. This includes but is not limited to:

- Exact duplicates and photocopies of existing, maintained Records;
- Personal papers;
- Blank forms;
- Personal email, telephone messages, text and instant messages, if those messages contain no substantive data relevant to the operation of Insight Global; and
- Drafts, unless otherwise specified herein, by the CO, Legal Department, or Compliance Committee.

Non-records should be destroyed unless they are of a personal nature, in which case the Custodian may use his or her own discretion in destroying or retaining the personal non-record.

CO – CO shall mean Compliance Officer.

Contractors – Individuals contracted by Insight Global to provide staffing support or related services directly to Insight Global customers. As a general business practice, contractors do not retain Healthcare Records on behalf of Insight Global; any Healthcare Record retention would be under the direction of customer personnel and subject to the customer’s record retention policies.

Record Custodian – A Records Custodian (or “Custodian”) is any Insight Global employee or Contracted Staffing Individual who created or Inherited a Record, as defined below.

Exception – If a Records Custodian requires an exception to a Schedule (see #7 below), he or she should contact Insight Global’s CO and Legal Department and request an Exception. Granted Exceptions will be noted on the next applicable annual review.

Inheriting a Record – To inherit a Record means that any Company employee or Contracted Staffing Individual who assumes new job responsibilities at or on behalf of Insight Global shall be responsible for maintaining the Records associated with their new job functions.

Schedule(s) – Attached to this policy is a schedule which outlines the timeframes for retaining specific kinds of records.

Record Retention Date – The Record Retention Date begins at the date the Record was first created or subsequently modified. This date dictates the initial time stamp for retention.

Protected Health Information – Protected Health Information (or “PHI”) means individually identifiable health information, whether orally conveyed or recorded in any form or medium, that is created or received by an employee or Contracted Staffing Individual in performing services on behalf of the Company, which relates to past, present or future health condition, services, or payment of a patient, and is transmitted or maintained in any form. For the purposes of this policy, PHI referenced herein only refers to PHI housed in a Record and not oral PHI.

III. PROCEDURE

1. **Record Retention Periods**

The Schedule specifies how long certain Healthcare Records need to be retained.

The Schedule does not address every type of Record that is created and/or maintained at Insight Global. If Insight Global employees or Contracted Staffing Individuals identify a Record that is not covered in the Schedule, they must notify the Compliance and Legal Department, and the Compliance and Legal Department will revise the Schedule or provide other instructions.

The Schedule must be adhered to unless an Exception is granted. All Records must be properly destroyed or retained as set forth in this policy and Schedule, unless:

- The Compliance and Legal Department has granted an exception to preserve or destroy the Records for a demonstrated business purpose;
- The records are subject to a litigation, governmental investigation, preservation notice or litigation hold (“Legal Hold”); *or*
- Contract terms require a longer retention period than the Schedule.

Record Storage

Generally, only one (1) copy of a Record must be retained, in accordance with the Schedule. Except as otherwise provided, original paper documents may be digitally scanned into an electronic format and the original paper document may be destroyed, except that originals should be retained if they cannot be properly scanned. The originals of the following documents should be retained: operating licenses; certificates of incorporation and any associated amendments; reports of inspections and surveys by outside agencies; and all licenses, permits and certifications required by law for the operation of Insight Global or required for Company employees and

Contracted Staffing Individuals. The applicable retention period for a Record does not change when a properly substituted electronic image of a Record is created.

Records must be accurately labeled with their content so they can be retrieved and destroyed as needed. Records that are stored off-site must be labeled and marked with a disposal date.

Safeguarding Procedures

Generally

All personnel are responsible for properly retaining all Records in their possession or control, in accordance with this policy.

All Records shall be adequately safeguarded, through physical and technical security mechanisms, against loss, damage and tampering. Personnel must notify the Compliance and Legal Department when they have knowledge that a Record has been inappropriately lost, damaged or tampered with.

All Records that contain Protected Health Information must be maintained and protected in accordance with this policy and Insight Global HIPAA policies and procedures.

Outside vendors who maintain Insight Global records are subject to this policy, and all contracts must contain language that requires their compliance with this policy unless otherwise approved by the Compliance Department and the Legal Department.

The appropriate way to destroy a Record depends on its form and content. See Section 8 for more details.

Electronic Records

The Information Technology Department shall work with Insight Global to: (i) ensure that electronic Records are adequately protected against accidental erasure, hardware malfunction or destruction; (ii) ensure electronic Records are regularly backed up; and (iii) implement processes to:

- Protect the integrity of the information contained within the Record;
- Restrict access to the Records to only authorized parties;
- Prevent unauthorized access to or alteration of a Record after it has been stored electronically; and
- Preserve the history of each Record.

Provided the Electronic Record is properly safeguarded in accordance with this policy:

- Electronic Records need not be printed or retained in paper format; and
- The original paper copy of a Record that was properly scanned into an Electronic Record may be destroyed provided the originating department ensures that:
 - the electronic Record is a complete and accurate reproduction of the paper Record; and
 - the electronic Record is readily available and reproducible.

IT or its designees must maintain documentation of how electronic Records are created and stored, including any changes in the systems in which they are stored. This documentation must additionally detail any information transfer between systems or forms.

Departing Employees or Contracted Staffing Individuals

Employees and contractors must review the Records in their possession with their supervisor before they:

- Terminate their employment or arrangement;
- Transfer to another position; and/or
- Materially change responsibilities.

All Records are the property of Insight Global, not the employee or Contracted Staffing Individual.

Employees and Contractors are prohibited from removing or destroying any Records upon departure, transfer or change in responsibilities, unless they have received their supervisors' consent. Note that any obligations regarding confidentiality, pursuant to Insight Global policy or agreement, shall remain in effect and are not altered in any way by this policy.

5. Inherited Records

Once an employee or contractor leaves a position or changes responsibilities at or on behalf of the Company, the person taking over the job responsibilities is the new custodian of the departing employee/Contracted Staffing Individual's records.

6. Annual Review

Review Procedures

Insight Global will conduct an annual review of its Records to ensure compliance with the required retention periods. This annual review includes a review of any Records stored off-site. This review process consists of:

- Ensure all Records (onsite and off-site) are appropriately labeled with contents and destruction date;
- Destroy Records which have exceeded their required retention period; and
- Destroying unnecessary duplicates of documents, drafts and non-records.

At the discretion of each department head, files may be scanned or paper files may be moved off-site for storage.

Review of Processes for Safeguarding Electronic Records

The Information Technology Department shall work with Insight Global's Compliance Committee to regularly conduct reviews of its information systems or equipment used for maintaining Electronic Records and its

processes for safeguarding Electronic Records to ensure Insight Global is able to:

- Verify the authenticity of the system or equipment;
- Verify that the system or equipment has not been altered and, if it has been altered, who altered it and when;
- Guarantee appropriate access to the system or equipment;
- Produce a legally accurate hard copy of Records from the system or equipment when needed; and
- Produce an audit trail of Records' history that reside on the system or equipment.

7. Legal Holds

All Insight Global custodians must notify Legal Department immediately upon receipt of the following:

- notice regarding the initiation of an audit or investigation by an outside agency;
- service of legal process (e.g., a subpoena or summons) involving Insight Global (note that Insight Global custodians are not to accept service of process on behalf of Insight Global);
- a complaint that Insight Global determines may lead to a formal action or investigation;
- a formal or informal claim; *or*
- becoming aware of acts or circumstances providing notification of, or suggesting there exists, a reasonable possibility of an impending lawsuit, audit or investigation involving Insight Global's Records.

The Legal Department will work to ensure that everyone who potentially has Records relating to a pending or active litigation or investigation is aware of the matter and any potential preservation obligations ("Hold Order"). When the Hold Order is lifted, Records revert to their original categories and may be destroyed according to their applicable retention schedule.

8. Destruction Procedure

If there is any question regarding whether or how long to retain a Record, whether something qualifies as a Record, or whether a Legal Hold has been put into or remains in place as to a Record, that Record must not be destroyed until the question has been resolved. It is the responsibility of the custodian of that Record to actively seek resolution of the question from the Legal Department.

Records that contain PHI, business, or other confidential information must be destroyed in a manner that ensures confidentiality and leaves the information unrecognizable. The methods below must be used to destroy Records:

- Paper: Depositing paper Records in a shredding bin located at Insight Global offices. If this is not available, then use one of the following methods: crosscut shredding, pulping pulverizing.
- Electronic: Electronic Records, including all backup tapes and drives, digital Records, film, and audio and video recordings should either be physically destroyed so they cannot be reused, or destroyed by an appropriate method approved by the CO and the Legal Department that renders the previous electronic data unrecoverable and impossible to reconstruct.

9. Non-Compliance

If you are aware of a situation that you believe may violate this policy, you must promptly contact an immediate supervisor or the Compliance and Legal Department at (404) 335-7347 (office) (IG Ext: 1517). Reports may also be submitted anonymously via the Insight Global Compliance Hotline at (800) 367-2884.

IV. APPROVAL/MAINTENANCE

This policy is approved by the CO and/or the Compliance Committee. Maintenance of this policy will be the responsibility of the Compliance Committee in coordination with the CO. The terms of this policy are subject to the terms of the Company’s policy inventory and alignment policy (the “Wrapper Policy”), as may be amended from time to time.

Note: The table below identifies a non-exhaustive list of records retained in the delivery of services.

RECORD RETENTION REQUIREMENTS SCHEDULE			
Process	Repository	Documents	Retention Period
Filling job requisitions	-Restrak/Comtrak -Email	-Candidate Profile Form ('CPF') -Candidate Profile	-Secure disposal after [TBD] days -Restrak/Comtrak - Indefinite -Email - 7 years
Ghost CPF'ing/Generating hot leads	-Restrak/Comtrak -Email	-Candidate Profile Form ('CPF') -Candidate Profile	-Secure disposal after [TBD] days -Restrak/Comtrak - Indefinite -Email - 7 years
In-house interview	Restrak	Electronic In House Visit Form	-Indefinite
Complete job application (ATLIS)	Restrak	Electronic Job Application	-Indefinite
Checking personal references	Restrak	Electronic reference check forms	-Indefinite
Initiate hiring process	Comtrak	Electronic Start Form ('ESF')	-Indefinite
Sign employment agreement	Email	Contract Employee Agmt ('CEA') Sub-Contract Agmt ('SCA')	-Indefinite
Complete background check	-BG Vendors -Email	Background Consent Background Results	-BG Vendor - TBD -Email - 7 years
Compliance w/IG and Customer Requirements	-Email -Compliance Fileshare -Vendor Mgmt Sys (VMSs) -BG Vendors -USCIS -ADP	Standard: I-9/Everify, scanned IDs, background consent, background results Client Specific: Varies by client	-Email - 7 years -Fileshare - Indefinite -VMSs - TBD -BG Vendors - TBD -USCIS - TBD -ADP - TBD

Payroll on-boarding (Silkroad)	-ADP (I-9/Everify, Payforce, HWSE) -Silkroad -Comtrak -Isynergy	W4, I-9/Everify, Harrassment and Discrimination policy, CEA, Direct Deposit Form, Emergency Contact form	-Silkroad - TBD -ADP - TBD
Enroll in benefits (ADP)	-ADP (self-service)	Electronic Enrollment Forms	-ADP - TBD
Complete weekly timesheet (IGTimetrak, Client System or Paper)	-Timetrak	Timesheet	-Indefinite
Annual open enrollment (ADP)	-ADP	Electronic Enrollment Forms	-ADP - TBD
Qualifying life event	-ADP -Email	QLE Form	-Indefinite
Training (We Comply or Talent MLS)	-We Comply -Talent MLS	Electronic Enrollment Forms Electronic Completion Forms	-Indefinite
Terminate on BCL / Auto-term (Comtrak)	-Comtrak	Electronic Termination Form	-Indefinite
Termination of Benefits (ADP)	-ADP	Electronic Termination Interface	-Indefinite
COBRA Notifications (Discovery Benefits)	-ADP -Discovery Benefits	COBRA Eligibility Notification	-TBD
Visit the job board	-ATLIS	TBD	TBD
Apply to a job or Submit Resume	-ATLIS	Electronic Sign-up Form Resume	-Indefinite