

Dominion Dental USA, Inc. and Subsidiaries

POLICY TITLE	MANAGEMENT AND RETENTION OF CORPORATE BUSINESS RECORDS
POLICY NUMBER	PF-0301D

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I. POLICY

This policy applies to Dominion Dental USA, Inc. and its directly and indirectly owned subsidiaries, affiliates, and employees, collectively referred to as "Dominion."

This policy addresses the maintenance, use, retention, and destruction of business records and information. Business records include, but are not limited to, all types of paper, microfilm, CD, optical disk, magnetic tapes, diskettes, emails, scanned documents, electronic files, and other documents.

It also addresses the responsibilities of the Records Management Unit and other units and departments throughout Dominion to ensure proper retention of records.

II. DEFINITIONS

Business Records

Business Records are recorded information, regardless of the medium (including paper and electronic records of any kind), made or received by Dominion that is used in company operations. Business Records must be retained for specified periods of time to satisfy legal, operational, contractual, fiscal, or historical requirements.

Records Management

Records Management is the planned and systematic control of all hard copy or electronic corporate Business Records from their creation through final disposition (either destruction or retention). Dominion works with the Records Management unit at Capital BlueCross and utilizes their Records Retention Center for storage.

Records Retention Schedule

A Records Retention Schedule is a standard list of titles that defines the length of time for which a Business Record is maintained by an organization. It also determines if and when a hard copy

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Business Record will transfer to the Records Management unit for inactive storage. Each department is responsible for ensuring proper retention of its area’s Business Records based on its master Records Retention Schedule, which must, at a minimum, meet the requirements of the General Retention Periods set forth in this policy.

Vital Record

A vital record is an item or information that is needed by an organization to establish, conduct, or continue business. It is also an item that if lost, the information could not be obtained from another source inside or outside the company, and you would be unable to conduct business without it.

III. POLICY

The purposes of the Records Management program are as follows:

- Function as a key element in Dominion’s preventive legal strategy
- Comply with federal and state retention requirements, as applicable
- Balance the cost and benefits of continued information retention versus the risk and liability of disposal
- Provide evidence of systematic disposition of information in the normal course of business
- Provide fast, efficient retrieval of business records
- Provide identification, protection, and storage of vital records
- Recommend the most effective medium (e.g., paper, microfilm image, digital) for storage of information

RETENTION SCHEDULES

Record Retention Schedules are sometimes required by federal or state statutes or regulations that mandate retention periods.

Proposing a Retention Period

To establish retention schedules, hard copy documents are reviewed in the specific department that owns or generates them and, after their value has been determined, the Compliance department, in conjunction with Legal, will categorize them into functional groups. Because of specific requirements governing retention of Medicare Business Records, it is important that Business Records be clearly marked and identified as Medicare records.

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The functional groups are named and a description and purpose of the group is recorded. Using information received from the department, Compliance and Legal research and propose a retention period for each group.

The retention period indicates the amount of time the hard copy business record should be maintained in the department and/or in the Records Management unit. Retention periods assigned to a Business Record are applied consistently without regard to the format used (i.e., paper copy and electronic media).

The Records Retention Schedule identifies the type of storage media to be used to retain all Business Records, notes, and any special instructions (e.g., who is responsible for disposing of the Business Records).

The Records Retention Schedule also identifies Vital Records and associated off-site storage requirements.

Approving a Retention Period

The proposed Records Retention Schedule is reviewed by the department involved and representatives from the Legal and Compliance departments.

Legal is ultimately responsible for determining the minimum legal retention periods required for each Business Record type.

Retention Revisions

The Records Management unit will accept for storage only those Business Records that are shown on the department’s master Records Retention Schedule. Therefore, the Records Management unit must be notified whenever a department creates a new Business Record, deletes an existing Business Record, or wants to revise the existing retention period assigned to its Business Records. This notification allows the formal approval process to take place and assures Dominion’s compliance with all legal requirements.

Note: An exception to these procedures is when a subpoena has been issued or litigation or a government investigation is pending, imminent, contemplated or threatened that could require retention of business records for a period of time that is longer than the time listed in any Records Retention Schedule. Under such circumstances, all records must be preserved and safeguarded as instructed by Legal department.

GENERAL RETENTION PERIODS

Each department is responsible for ensuring proper retention of its area’s records based on the Master Retention Schedule.

Note: The following information is meant as a general guideline and should not be used as an all-inclusive or permanent list.

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PERMANENT RETENTION

The following are some examples of records that are permanently retained:

- Certain litigation files
- Job descriptions
- Enrollment (Medicare enrollment and disenrollment records are subject to their own specific requirements as set forth in the Ten Year Retention section below)
- Cash receipt journals
- Financial statements
- General ledger
- Income tax returns
- Product filings
- Credentialing files
- Insurance department filings
- Business Continuity

TEN YEAR RETENTION – QHPs and FFM

As an issuer of Qualified Health Plans (“QHPs”) on the Federally-Facilitated Exchange market (“FFM”), and state-based exchanges, Dominion must maintain all relevant records for ten (10) years, including all documents and records (paper, electronic, and other media) and other evidence of accounting procedures and practices, including financial records related to Dominion’s QHP participation and records to demonstrate compliance with all FFM and exchange standards, as required pursuant to 45 CFR 156.705; 45 CFR 155.1210(b)(2), (3) and (5). The records must be sufficient to accommodate periodic auditing of the relevant financial records and enable HHS or its designee to inspect facilities, or otherwise evaluate Dominion’s compliance with Federal and state standards.

Examples of records related to QHPs and FFM that must be retained for ten years include, but are not limited to:

- Information concerning management and operation of Dominion’s financial and other record keeping systems
- Financial statements, including cash flow statements, and accounts receivable, and matters pertaining to the costs of operations
- Any financial reports filed with other Federal programs or State authorities
- Data and records relating to Dominion’s eligibility verifications and determinations, enrollment transactions, appeals, and plan variation certifications

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- Qualified health plan contracting (including benefit review) data and consumer outreach and Navigator grant oversight information

TEN YEAR RETENTION – Medicare

All Medicare records in electronic or paper form must be retained for ten years (through December 31st of the tenth year), or longer, if otherwise required by law. (42 CFR section 422.504(d))

Examples of Medicare product records that must be retained for ten years include, but are not limited to:

- All medical records
- All claims information
- Enrollment and disenrollment information
- Referrals
- All Member Service documentation associated with claims and all other services to Medicare members
- Appeals
- Grievances
- Sales transactions
- Marketing materials

EIGHT TO TEN YEAR RETENTION

The following are some examples of records that are retained for eight years or more. Non-Medicare product records that include, but are not limited to:

- All medical records (except employees)
- All claims information
- All Member Service department documentation associated with claims
- Bank deposit slips
- Commissions
- Voucher files
- Group settlements
- Balancing reports
- Member materials

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Tax correspondence
Invoices
Group files
Referrals

SEVEN YEAR RETENTION

The following are some examples of records that are retained for seven years:

Problem/Complaint/Inquiry logs
Quarterly utilization reports
Transmission files
Transfer files
Underwriting audits

SIX YEAR RETENTION

The following are some examples of records that are retained for six years:

General files
Group files
Files of terminated employees
HIPAA Security documentation

FIVE YEAR RETENTION

The following are some examples of records that are retained for five years:

Continuing student cert files
Travel arrangements
Tracking report
RFPs
Project information

Note: Numerous records are also submitted to the Records Management unit that have retention periods other than those listed above. Please review the Records Retention Schedule for a complete listing of approved titles.

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ELECTRONIC MAIL (E-MAIL) RETENTION

E-mails are routinely backed up for business recovery purposes only. Specific e-mail messages, including back-up copies, are retained as follows:

Outlook Item(s)	Retention Period
Deleted Items folder *	No more than 14 days
Contacts folder Personal/Public folders Sent Items folder Tasks folder Calendar	Permanent Retention
* These items are automatically deleted when they reach the appropriate age.	

E-mails may be subject to subpoenas, government requests, discovery, and production in litigation.

E-mail that is classified as a Business Record should be printed or scanned as a pdf copy and maintained in department files according to the Record Retention Schedule. Generally, employees who receive a carbon copy of a Business Record are not required to print or file the e-mail message.

E-mail must not be forwarded to personal e-mail accounts or saved onto personal electronic devices, or personal storage solutions (e.g., Gmail, DropBox, iCloud, personal laptop, etc.) for purposes of evading retention guidelines.

LITIGATION HOLDS

Dominion expects all employees to fully comply with any published records retention or destruction policies and schedules, provided that all employees should note the following general exception to any stated destruction schedule: If an employee believes, or is informed by Dominion, that Dominion records are relevant to litigation, or potential litigation (i.e., a dispute that could result in litigation), then the records must be preserved until Legal determines that the records are no longer needed. This exception supersedes any established destruction schedule for those records. If an employee has reason to believe that the exception may apply, or the employee has any question regarding the possible applicability of that exception, the employee should contact Legal.

DISPOSAL OF RECORDS

The retention schedule specifies the time and method of Business Records disposal. Each department or business unit is responsible for disposal of Business Records if the records are in the department or business unit when due for disposal. If Business Records are on any non-

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mixed paper media (CD, diskettes, microfilm), the Compliance department will contact the Records Management unit to arrange for destruction.

If the Business Records are in the Records Management unit, they are responsible for disposal after receiving departmental, legal, and compliance approval.

If the Business Records are maintained on a server or stored on another electronic client, the IT department is responsible for disposal after receiving departmental, legal, and compliance approval.

POINT OF CONTACT ASSIGNMENTS

Each department head designates a “point of contact” who is familiar with department files and documents. The Compliance Department is responsible for contacting the Records Management unit as needed and for maintaining a copy of Records Management procedures and forms and the computer print-out of department Business Records currently in archives (POC Box Report, Retention Schedule, Media Report, etc.).

VIOLATIONS

Individuals who suspect, or have knowledge of a violation of this policy must report that violation immediately to their manager/supervisor. The manager/supervisor should evaluate the information and contact the Compliance department if it appears that a violation has occurred.

Violation of this policy is subject to disciplinary action. Disciplinary action may start at any level, up to, and including, immediate termination depending on the severity of the violation. Willful violation of applicable state and federal laws may also result in civil or criminal punishment as allowed by state and federal law.

IV. RELATED INFORMATION/QUESTIONS

PF-306, Destruction of Confidential and Proprietary Information, contains additional information regarding the destruction of Business and Non-Business Records.

Record Retention Schedule (located at: <I:\Regulatory\General Operations\Record Retention>)

Refer all questions concerning records storage facilities and requests for standard records boxes or other supplies to the Compliance department.

Refer all questions concerning procedural/policy issues to the Compliance Department.

Refer all questions concerning Medicare product records to the Compliance Department.

Refer all questions concerning Server and Electronic Client information to the Chief Information Security Officer.