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|-----------------------|----------------------------------|-----------------------------------|--|
| Policy Number         |                                  | Policy/Operational Procedure Name |  |
| COM.0017v1            |                                  | <b>Record Retention</b>           |  |
| Sponsor               |                                  | Custodian                         |  |
| Rachel Davis          |                                  | Rachel Davis                      |  |
| Department Name       |                                  | Company Name                      |  |
| Enterprise Compliance |                                  | Alivi                             |  |
| Effective Date (s)    | Review Date                      | Next Review Date                  |  |
| 1/1/2024              | 9/24/2024                        | 9/24/2025                         |  |
| Approved By           | Policy Location                  | Citation                          |  |
| Compliance            | AliviNet - Compliance SharePoint |                                   |  |

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| <p><b>Policy Statement</b></p> <p>This policy establishes the guidelines for the retention, storage, and management of all records related to Alivi's book of business. It also outlines disciplinary actions for employees, providers, and drivers who alter, falsify, or destroy documentation prior to the end of the required retention period.</p>  |
| <p><b>Scope</b></p> <p>This policy applies to all Alivi staff, providers, and others that may be involved in the creation, management, or storage of records related to Alivi's book of business. It covers all records, whether in physical or digital format, that are created in the course of providing services to our health plan partners and members.</p>  |
| <p><b>Procedure</b></p> <p><b>Definitions</b></p> <ul style="list-style-type: none"> <li>• <b>Records:</b> Any documentation, including logs, service reports, billing information, trip documentation, driver records, and any communications related to NEMT services.</li> <li>• <b>Retention Period:</b> The mandated timeframe for which records must be preserved and maintained before they can be lawfully destroyed or archived.</li> <li>• <b>Falsification:</b> Any unauthorized alteration, forgery, or misrepresentation of information in records.</li> <li>• <b>Destruction:</b> The permanent deletion or disposal of records, making them irretrievable, either by shredding, deletion, or other means.</li> </ul> <p><b>Record Retention Requirements</b></p> <ul style="list-style-type: none"> <li>• All records related to Alivi services must be retained for a minimum of ten (10) years from the date of creation or the date of the last service provided, whichever is later.</li> <li>• Records subject to this policy include, but are not limited to:             <ul style="list-style-type: none"> <li>○ Trip logs and driver logs</li> <li>○ Billing and reimbursement documentation</li> <li>○ Communication logs with Medicaid beneficiaries and healthcare providers</li> <li>○ Compliance records</li> <li>○ Vehicle maintenance and inspection reports</li> <li>○ Incident reports and disciplinary actions</li> <li>○ Medical necessity and authorization documents</li> <li>○ Provider credentialing</li> </ul> </li> <li>• For records involved in any legal dispute, audit, investigation, or claim, the retention period may be extended beyond ten (10) years until the issue is resolved and all legal obligations are fulfilled.</li> </ul> |

**Destruction of Records**

- After the retention period has expired, records may be destroyed in accordance with approved destruction methods, including shredding for paper records and secure deletion for digital files.
- The destruction of records must be documented and carried out in a manner that ensures the confidentiality and security of the information.

**Alteration, Falsification, and Destruction of Records Prior to Retention Period Expiry**

- Prohibited Actions:
  - Providers are strictly prohibited from altering, falsifying, or prematurely destroying any records within the retention period.
  - Any modification to a record must be properly documented, with a clear indication of the date, time, and reason for the modification, as well as the identity of the person making the change.
  - Falsifying information in records, including forging signatures, changing trip logs, or providing inaccurate data, is a violation of this policy.
  - Premature destruction of records, whether intentional or accidental, is also prohibited.

**Actions for Violations**

- Investigation: Any suspicion or report of altered, falsified, or destroyed records will prompt an immediate internal investigation. Alivi's compliance department will review the records and interview relevant personnel to assess the validity of the claim.
- Consequences for Providers:
  - If it is determined that a provider or driver has engaged in altering, falsifying, or prematurely destroying records, disciplinary actions will be taken, which may include:
    - Immediate suspension of the individual or entity involved
    - Termination of employment or contractual agreements
    - Restitution for any financial or operational losses incurred due to the falsification or destruction of records
    - Referral to law enforcement or regulatory authorities, including Medicaid, for further legal action
  - In cases where the violation involves Medicare and/or Medicaid fraud or non-compliance with state and federal regulations, the individual or entity may face legal penalties, including fines, imprisonment, or exclusion from participation in Medicare and/or Medicaid programs.

| References |
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| Revision Record |                |              |                           |
|-----------------|----------------|--------------|---------------------------|
| Revision Date   | Version Number | Revised by   | Revision Description      |
| 1/1/2024        | V1             | Rachel Davis | Policy Creation           |
| 9/24/2024       | V1             | Rachel Davis | Policy Review; no updates |
|                 |                |              |                           |