



Records Retention Policy

Purpose

The Office of Graduate Medical Education (GME) at the University of Arizona College of Medicine - Tucson (UACOM-T) sets forth this policy to establish guidelines for the retention, maintenance, and destruction of records for Trainees in compliance with State of Arizona and Accreditation Council for Graduate Medical Education (ACGME) recommendations. The term "Trainee" includes all residents and fellows enrolled in ACGME-accredited and non-standard training (NST) programs.

The ACGME does not have defined standards for document retention but does provide guidance and recommends that document retention practice follow institutional document retention standards (ACGME Expectations for Content of Resident and Fellow Files, September 2018).

The ACGME Common Residency/Fellowship/One-Year Program Requirements (2023) state:

II.A.4. Program Director Responsibilities

II.A.4.a) The program director must:

II.A.4.a).(11) *provide verification of an individual resident's education upon the resident's request, within 30 days (Core)*

The State of Arizona's set of General Retention Schedules Record Series Code 10173 Academic Records – Academic Affairs Records states that *all academic credential records must be retained for 75 years from the date of matriculation. Record Series Code 53183 – Student Admission Records: Prospective Student/Incomplete Application Records states that materials for individuals who did not fully complete the admissions application process must be maintained for 18 months from the date of creation.*

The University of Arizona's Custom Retention Series Code 53650 Program Records – Non Historical states that *all program records must be maintained for 5 years from the date of creation. Best practice per ACGME processes (10-year self-study) is to maintain program records for a minimum of 10 years from creation.*

Arizona Revised Statute (A.R.S.) § 41-151.19 stipulates that *Official Records (henceforth just "records") that no longer have any legal, administrative, fiscal, or historical value (because they fulfilled their mandated retention requirements and no longer have any other operational purpose) shall be eligible for destruction using one of two state approved document destruction methods.*

Procedure:

1. Trainee Personnel Records:

- a. Each program must keep the following documents on file for each trainee throughout the duration of their time in training:
 - i. Completed rotation evaluations of the trainee by faculty members

- ii. Completed multi-source evaluations (examples: peer, self, nurses, non-physician staff members).
 - iii. Medical school graduation documentation and Education Commission on Foreign Medical Education (ECFMG) certification for international medical graduates
 - iv. For trainees engaged in moonlighting, annual prospective written statement of permission from the program director
 - v. Documentation of current training or permanent licensure
 - vi. Documentation of scholarly activity and quality improvement projects, including records of presentations, abstracts, and publications
 - vii. Documentation of prior education and training for trainees who have transferred into the program, as applicable
- b. Each training program must maintain the following core documents for all trainees for a minimum of 75 years from the date of matriculation (to accommodate future requests for primary source verification of program participation.)
 - i. The trainee's final (summative) evaluation,
 - ii. Certificate of Completion, as applicable
 - iii. Completed semiannual evaluations,
 - iv. Record of the trainee's rotations, training experiences, and procedures, as applicable to the specialty; and,
 - v. Documentation of disciplinary action, if any.
- c. For trainees who do not complete the training program, are not recommended for autonomous practice or eligible for board certification, the training program will keep the trainee's entire file on record for a minimum of 75 years from the date of matriculation.

2. Training Program Records:

- a. Each training program should maintain the following documents on file for at least 10 years from creation.
 - i. Schedule of didactics, conferences and other educational activities
 - ii. Completed annual evaluations of faculty members by trainees
 - iii. Annual Program Evaluations
 - iv. Curriculum documents
- b. Each training program should maintain active program policies and guidelines as long as the program is active. When a policy is updated, the previous policy or guideline should be maintained for 10 years after revisions are made.

3. Records of Unsuccessful Applicants:

- a. Records of applicants who did not match, were not accepted, withdrew themselves from consideration, or were not selected to be interviewed by the program will be retained by the program for 18 months after the creation of the document.
 - i. Programs are responsible for maintaining application records in paper or electronic form.

4. Response to Record Requests

- a. All requests for trainee records must be submitted to the training program in which they are currently participating or previously participated.
- b. Requests must specify the purpose of the request and the specific records needed.
- c. If the trainee is not requesting the records themselves, a release of information signed by the trainee must be provided with the records request.
- d. Requests for records will be fulfilled within 30 days.
- e. A record of all requests and the response provided, including copies of the released documents and correspondence related to the request, must be maintained for a minimum of 75 years from the date of the request.

5. Storage and Security

- a. Trainee files may be contained in an electronic system, or in a combination of paper and electronic records. Secure storage to prevent loss of records, and electronic file back-up and recovery protocols must be in place and consistently followed.

6. Destruction of Records

- a. Records that are no longer required to be maintained should be destroyed in a manner that ensures the information cannot be reconstructed or retrieved. Information regarding state approved methods for destruction of records can be found at the following link: <https://records.arizona.edu/destruction>

Effective 11/01/2024, approved by GMEC 11/01/2024