

Departmental Policy Title:	Resident Record Retention Policy - GME	Policy ID:	17336
Keywords	quality, assurance, QA, personnel file, retain, retention, record, fellow, resident		
Department	Graduate Medical Education (GME)		

I. Purpose of Policy

To delineate the way in which Accreditation Council for Graduate Medical Education (ACGME) - accredited Graduate Medical Education (GME) programs maintain Resident and Applicant records at Dartmouth Hitchcock (DH).

II. Policy Scope

This policy applies to Program Directors, Program Coordinators and GME Office staff at DH.

III. Definitions

- **Applicant:** Any eligible Medical Doctor (MD) or Doctor of Osteopathy (DO) applying for acceptance to a GME program.
- **COMLEX:** Comprehensive Osteopathic Medical Licensing Exam.
- **ECFMG:** Education Commission for Foreign Medical Graduates.
- **Electronic Residency Application Service (ERAS):** The centralized online application service used by the Association of American Medical College (AAMC) to transmit residency applications to Program Directors.
- **GME Files:** Personnel and quality assurance files external to MedHub which reside in the GME Office network or in paper files.
- **Life Support Certifications:** Basic Life Support (BLS), Advanced Cardiac Life Support (ACLS), Advanced Trauma Life Support (ATLS), Pediatric Advanced Life Support (PALS), Neonatal Resuscitation Program (NRP).
- **Program:** Program Director and Program Coordinator.
- **Program Files:** Materials other than those personnel and quality assurance files in MedHub which may reside in department network or paper files.
- **Medical Student Performance Evaluation (MSPE):** Also known as the Dean's Letter, the MPSE in a medical school evaluation that the Resident applicant has waived the right to see that is received as a part of the Resident's application.
- **Resident:** Any physician in an accredited GME program, including Residents and Fellows.

- **Resident Graduate:** A Resident who successfully graduates from an ACGME-accredited training program at DH.
- **Resident Non-Graduate:** A Resident who does not successfully graduate from an ACGME-accredited training program at DH. Resident Non-Graduates include Residents dismissed pursuant to disciplinary action, those whom transfer to an external training program, and those who term for other reasons without graduating.
- **Resident Records:** Electronic records pertaining to a Resident's training. Resident Records include:
 1. Personnel Records – confidential records containing factual, objective, and employment-related information including but not limited to applications, agreements of appointment, certifications, licenses, training exam scores, onboarding package documents, background checks, procedures, and verifications.
 2. Quality Assurance (QA) Records – confidential documents pertaining to the evaluation of a Resident that are protected from disclosure under New Hampshire State Law (RSA 151:13-a and RSA 329-29-a) and Vermont Law (26 V.S.A. § 1441, 26 V.S.A. § 1442 and 26 V.S.A. § 1443). QA records include but are not limited to confidential records containing evaluative data, remediation documents, disciplinary documents, ACGME Milestones and Progress Reports.
- **Scholarly Activity:** An opportunity for a Resident and faculty to participate in research, as well as organized clinical discussion, rounds, journal clubs, and conferences (e.g. presentations and attendance at national meetings, research projects, publications).
- **USMLE:** United States Medical Licensing Examination.

IV. Policy Statement

A. General

Resident Records provide a comprehensive record of a Resident's activities in a GME training program. Resident Records are learner records, employee records, and are used to verify completion of training requirements.

GME programs must maintain Resident Records in the Residency Management System, MedHub. Additional files may be kept in department network files. Archived files for a Resident who graduated prior to 2015 may be kept in paper format at a DH approved off-site location.

Resident case/procedure logs must be de-identified of any Protected Health Information (PHI) (e.g. patient names and medical record numbers).

B. Resident Record Access

1. **GME & Program Access:** Resident Records are available to Program Leadership, Program Faculty (Interview Committee and Clinical Competency Committee), and to the GME Office staff.
2. **Current Resident Access:** A Resident in a GME training program who is not on an administrative leave has access to their Resident Record in MedHub.
3. **Former Resident Access:** Upon request, the former Resident will receive timely access to review their Resident Record under the direct supervision of Employee Relations, the

GME office or Program Leadership, ***except for:***

- Items the Resident has waived the right to review.
- QA records or any other documentation which are privileged, confidential, proprietary, or otherwise legally protected under federal or New Hampshire law.

A former Resident who requests a copy of their Personnel Record may request it through Employee Relations. Note: A former Resident does not have the right to receive a copy of their Verification in Graduate Medical Education Training form (VGMET).

C. Disclosure to Others

All requests for documentation of a current Resident or former Resident external to DH must be requested in writing, via MedHub, and include a completed DH Authorization and Release of Liability form signed by the Resident or former Resident.

1. Verification of Training

Requests from a hospital or other healthcare facility for credentialing/privileging:

- **Current Resident:** Verification of training for a current Resident is completed by the GME Office via a letter identifying the Resident's training dates.
- **Former Resident:** The GME Office verifies training of a former Resident using the program director signed VGMET form.

Entities requesting additional verification/credentialing documentation beyond the standard letter or VGMET are reviewed on a case-by-case basis by the GME Office in conjunction with Employee Relations, Risk Management, or the Office of General Counsel as necessary.

2. Resident Transfer

When a Resident transitions their training within or outside of DH, the current training program is required to provide the Resident's Final Summative Evaluation and most recent ACGME Milestones to the new program. Requests for these documents must follow the standard GME verifications process with a signed DH Authorization and Release of Liability form.

3. Requests for Personnel or QA Records

Requests for access to Personnel or QA records beyond the standard verification is reviewed by the Risk Management Office or Office of General Counsel prior to being released external to DH including requests by Resident Graduates and Resident Non-Graduates.

The Office of General Counsel is available to assist with all questions relating to whether certain documents may or may not be disclosed to external parties.

D. Record Retention

Records may not be destroyed if any litigation, claim, negotiation, audit, open records request, administrative review, or other action involving the record is initiated before the expiration of a

retention period for the record until the completion of the action and the resolution of all issues that arise from it.

1. Resident Records: Programs are required to retain Resident Records for a minimum of seven years after completion of training or withdrawal from the program, unless otherwise noted below. In addition, programs must follow record retention guidelines set by the program's ACGME Review Committee (RC), if any.

- **Resident Non-Graduate** - Entire record must be permanently retained.
- **Resident Graduate** - The following items must be permanently retained:
 - Rotation/Training: Dates of training, graduation certificate, VGMET form, procedure/operative logs, rotation/on-call schedules*
 - Evaluation: Final summative evaluation
 - Confidential Items: Board scores, verifications of training, grievance and appeals materials, notice of termination, disciplinary actions
 - Incoming Transfer Resident: Verification of previous educational experience, summative evaluation, ACGME Milestones

*Resident rotation/on-call schedules must be retained for 10 years following the end of the fiscal year, to provide primary verification of rotations in the event of a Medicare audit of prior training years.

2. Records of Unsuccessful Applicants: Records of Applicants who did not match, were not accepted, withdrew from consideration, or were not interviewed are retained by the program for two years after recruitment has ended and final candidates have matched/accepted for the academic year being filled.

- **ERAS Users:** ERAS automatically maintains application records in an archive accessible through the ERAS website. No additional retention of application materials is necessary.
- **Other Application Processes:** Programs are responsible for maintaining application records in paper or department network drives.

E. Resident Records Retention

Records	Can Purge 7 Years Post-Grad	Access Permitted	Location of Record	Maintenance Responsibility
Application				
ERAS/Equivalent application form	Yes	Resident, Faculty, Program, GME Office	MedHub	Program
Curriculum vitae				
Personal statement				
Medical school transcript				
USMLE/COMLEX transcripts				
ECFMG, visa/immigration				
MSPE (confidential material)		Program, GME Office	Program Files	
Letters of recommendation (confidential material)				
Interviewer evaluation forms				
Applicant/program director correspondence				
Transfer Resident (incoming)				
Verification of previous educational experience	No	Resident, Program, GME Office	MedHub	Program
Summative evaluation				
General Personnel Information				
Demographics	Yes	Resident. Program. GME Office	MedHub	Program, GME Office
Contracts				GME Office
NH training license				
Lab coat information				
Leave of absence				
Request for vacation time				
I-9 files (or other disclosing ethnicity, national origin, or citizenship)	No		GME Files	Program
License application/renewals				
Background checks		GME Office		
Rotation/Training				
Graduation certificate	No	Resident, Program, GME Office	MedHub	GME Office
VGMET form				Program
Dates of training				
Rotation/on-call schedules				
Procedure and/or operative logs (if applicable)				
Conference attendance logs/dates	Yes		MedHub or Program Files	
Life Support Certifications (BLS/ACLS etc.)				
Scholarly activity				
Moonlighting			MedHub	GME Office

Records	Can Purge 7 Years Post-Grad	Access Permitted	Location of Record	Maintenance Responsibility
Evaluations				
Formative evaluations	Yes	Resident Program GME	MedHub	Program
Semi-annual evaluations				
Final summative evaluation	No			
Other				
Correspondence	Yes	Resident Program GME	MedHub or Program Files	Program
Awards				
Confidential – Resident Access				
Promotion recommendations	Yes	Resident Program GME	MedHub	Program
In Training Exam (ITE) results				
Board scores	No			
Verifications of training				
Grievance and appeals materials				
Notice of termination				
Disciplinary actions				
Confidential – No Resident Access				
Application Process				
MSPE (Dean’s letter)	Yes	Program GME	MedHub	Program
Faculty letters of recommendation				
Other letters of recommendation				

V. References - N/A

Responsible Owner:	Graduate Medical Education (GME)	Contact:	Karen Miller
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Related Policies & Procedures:			
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