

## Program File Management and Retention Guidelines

<b>Offices of Accountability:</b>	Postgraduate Medical Education Office and Residency Programs
<b>Offices of Administrative Responsibility:</b>	Postgraduate Medical Education and Residency Programs
<b>Scope:</b>	University and Postgraduate Training Program Leadership and Administrative Team
<b>Approved</b>	PGME Committee – 2-Feb-2023

The purpose of these guidelines is to create a structure for the effective records management of postgraduate trainee information as held by postgraduate programs. This includes a records retention and disposal schedule, and accountabilities for records management of administrative records within postgrad. In any instances you require guidance for trainee records beyond what is contained in these guidelines please defer to the central [Dalhousie Records Management Policy](#), [DalCLASS](#) or in some cases guidelines set by hospitals or health authorities.

### 1. Document retention

The following types of documents in a postgraduate trainee’s program file shall be retained for the following periods of time unless otherwise stated in DAL CLASS or other policy. For any documentation that is to be part of a postgraduate trainee’s permanent file or university archives please send to the PGME Office to coordinate.

<b>Item</b>	<b>Program Retention Period</b>
<u><b>Personal Information</b></u> -Signed contract -Information profile sheet -Banner ID -CME	Held for a minimum of 2 years with a maximum of 5 years after residency ends, at which point PGME Office maintains the main record and program shall dispose.
<u><b>Credentialing information</b></u> -CMPA -Copy of provincial license	Held for a minimum of 2 years with a maximum of 5 years after residency end and then disposed.
<u><b>Evaluations and Enhanced Learning Plans</b></u>	Evaluation information stored in One45 can be left in One45 and stored indefinitely.

-ITERS, ITARs, Bi-Annual Performance Review, Competency Committee Review or Competency Committee Promotion Decisions -Faculty/Preceptor Logs - Formal and Informal written enhanced learning plans	Written IELPs and FELPs as well as ITERs and ITARs for failed rotations should be held until end of residency at which point it will be stored by PGME Office.
<b><u>Dates</u></b> -Rotation Schedule -Attendance record -Leave history	Held for minimum of 2 years with a maximum of 5 years after residency ends, at which point disposed. PGME Office to be responsible for any leave information affecting training dates.
<b><u>Application information</u></b> -CaRMS and other application information	PGME to hold. Storage at secondary offices not advised. (DalCLASS ST26)
<b><u>Academic information</u></b> -Field Notes -Presentations -Postgraduate trainee Project Forms and Completed Project	Presentations → If program deems of value can hold for 3 years after presentation was delivered then can send to university archives (DalCLASS ER33)
<b><u>Financials</u></b> -Expense sheets and reimbursements	Held for a minimum of 2 years with a maximum of 5 years after residency ends, at which point disposed.
<b><u>Other</u></b> -Notes, Correspondence, Miscellaneous	Professional Development → 5 years (DalCLASS HR61) Research grants → retained for 10 years if you distribute the funds, 3 years if not (DalCLASS RS12) Everything else → Held for minimum of 2 years with a maximum of 5 years after residency ends at which point disposed. Unless program thinks may be important (ex. legal information) and should consult PGME to see if it needs to go into PGME record.

## 2. Accountability

### PROGRAMS

Programs are responsible for managing files for the postgraduate trainee required for program operation purposes only. This information is outlined in the components of a postgraduate trainee file (see section 6). Programs must also provide the PGME Office with copies of information pertaining to:

- FELPS
- Withdrawals/transfers
- Impacts on residency status and/or dates
- Part-time training

Departments accepting a Hospital-Based Fellow are responsible for verifying that individual's training for the duration of their working career. The PGME Office will not store any information for Hospital-based Fellows.

#### PGME OFFICE AND DALHOUSIE

The Postgraduate Medical Education Office works along side the Dalhousie Records Management Office and other offices (student accounts, registrar's office, etc.) to oversee information required for administration, verifications, reporting as well as long term file storage. The postgraduate trainee information contained by the PGME Office/Dalhousie should be considered the primary source of information for trainees and efforts should be made by programs and the PGME Office to ensure it is up-to-date and accurate.

#### OTHER

The PGME Office and programs are not responsible for storage of any HR-related information long term E.g. pay information, reimbursements, occupational health and safety incidents. This is managed by the health authorities/hospitals where postgraduate trainees work.

### **3. Format and Storage**

Postgraduate trainee records can be kept in physical and digital formats. It is often best to keep records in their original format, but this is not required. If the format has been changed (e.g., a paper copy is digitized), documentation must be created to indicate that the new format is a true representation of the original. (Notarizing such documents is not necessary; an electronic notation on the document of the digitization date and the person who digitized the document, attesting that it is a true representation of the original, is sufficient.)

Whenever possible a record should be held in a single format in a single location. This creates less duplication of effort and lowers the risk of documents becoming out of sync. When a record must be held in more than one format or location, the contents need to be cross-referenced to ensure that the complete record can be accessed across its locations.

### **4. File Security**

Given that postgraduate trainee files contain confidential and identifying information precautionary measures need to be taken to ensure it is appropriately stored and handled. Physical postgraduate trainee files need to be kept in a secure location under lock and key, digital/electronic records need to be stored locally and be password protected.

It is the programs responsibility to ensure that only those who require access to a postgraduate trainee's files are given such access. This includes updating access in the event of a change of program director or program administrator. In the event confidential or postgraduate trainee-identifying information is lost or shared where it should not be, the program must notify the PGME Office immediately. The program may also need to notify the postgraduate trainee and complete a privacy incident report.

## **5. Record Disposal**

Record disposal should be an ongoing process. Program Administrators are responsible for ensuring regular and systematic disposal of records in their program according to Dalhousie and hospital policies. For any postgraduate trainee information that has passed its retention period the file must be disposed of. Before disposal of any information that is also retained by the PGME Office please ensure the PGME office has an up-to-date record.

For disposal of physical records, please shred documents or place in a secure destruction bin to ensure that any personal or other confidential private information is not disclosed. For electronic records please ensure data is permanently deleted. If you need assistance destroying media containing electronic records (such as CDs, videos, disks, USBs, etc.), please contact the PGME office so they can assist in arranging this.

## **6. Postgraduate trainee File for Postgraduate trainees (Programs)**

All Dalhousie postgraduate trainees have a file (binder and or electronic file) kept by the program to include information pertaining to their training. The responsibility and accountability for the creation, use, security, maintenance, and destruction of information in the file is the responsibility of the program.

Note: All postgraduate trainees have access to their file upon request with proper notice.

### GENERAL COMPONENTS MAY INCLUDE:

1. The administrative portion of the annual reviews (minimum 2 per year); Personal Information – copy of provincial license, signed contract, information profile sheet, Banner ID, CMPA, and CME
2. Notes of meetings between postgraduate trainees and faculty
3. Postgraduate trainee Portfolio (Project Forms and completed project, presentations)
4. Rotation Schedule (from One-45) including Electives
5. Copy of Evaluations – ITARs, ITERs, Competence Committee Reports, and other evaluation types
6. Leave History – vacation, educational leaves, lieu days, floating leave days, sick days, or other types of leave.
7. Attendance Record (attendance at program/academic events can also be included)
8. Expense Sheets for CME events, travel, accommodation reimbursement etc.
9. CONFIDENTIAL INFORMATION. Confidential information is not to be given to the postgraduate trainee if a request for copy of file/binder is received. May include legal matters, and other materials of sensitive nature.

## 7. Components of a postgraduate trainee file (PGME Office)

Postgraduate trainee information is also held by the PGME office for training and verification purposes.

### COMPONENTS WILL INCLUDE ANY OF THE FOLLOWING THAT APPLY TO THE TRAINEE:

1. PGME Application (Postgraduate Medical Education)
2. CaRMS documents
3. Contract
4. Immunization records
5. Financial Guarantee (VISA/IMG sponsored)
6. Sponsorship Agreements (Return of Service)
7. Correspondence leading up to the start date (i.e. delayed start, licensing issues, etc.)
8. Media Consent Form
9. Postgraduate trainee Information Profile & Photo
10. Annual RIRs (Postgraduate trainee Information Renewal)
11. Leave of Absence information\*
12. Transfer documents\*
13. Withdrawal documents\*
14. Verification of Training\*
15. Copy of Certificate(s)
16. CCT/FITERS\* (Confirmation of Completion of Training; Final In-Training Evaluation Report)
17. ITER/ITARs (In-Training Evaluation Report; In-Training Assessment Report)
18. Remedial (FELP) documents\* (Formal Enhanced Learning Program)
19. CIP documents\* (Clinical Investigator Program)
20. Sub-specialty match application & contract\*
21. Waiver of Training\*
22. RCPSC/CFPC credit documentation\* (Royal College of Physicians & Surgeons of Canada; College of Family Physicians Canada)
23. Letter of Extension\*
24. Legal proceedings\*
25. Appeals\*

*\*If applicable*

The information the PGME Office manages is retained for 50 years after a trainee completes training, withdraws or is dismissed (unless policy directs otherwise). Programs can request access to these files if needed. Trainees can also request access to their files (see Records & Access to Postgraduate Trainee Files Guidelines).