

The American Academy of Family Physicians National Research Network and its sub-networks (collectively known as the AAFP NRN) abide by the following policy regarding data retention, storage, and destruction.

The retention of any documents not described in these guidelines will be covered in the official AAFP Document and Record Retention Policy, which can be supplied upon request.

## Data Retention

It is the policy of the AAFP NRN to retain all study- and grant-related documents for a period of six years after the completion of data collection and subsequent close of the protocol with the AAFP Institutional Review Board (IRB). These documents include, but are not limited to, financial and programmatic records, supporting documents, statistical records, signed consent forms, identifiable data, and any anonymous surveys.

This policy applies to both paper and electronic storage of applicable information, including electronic storage of faxes, copies of paper documents, images, and other electronic media. It is acceptable to scan paper documents for electronic storage. The original paper documents must be destroyed using the data destruction guidelines outlined below.

The policy of the AAFP NRN takes into account all related data retention policies of the U.S. Department of Health and Human Services (HHS), the Health Insurance Portability and Accountability Act (HIPAA), and the AAFP IRB.

## Data Storage

The AAFP NRN uses every appropriate administrative, technical, and physical safeguard to protect the privacy of study participants. To maintain confidentiality, all completed study data collection instruments are housed in a locked filing cabinet and/or in a secure, locked, limited-access location. Only NRN staff members have access to these locations.

All electronic images of paper documents will show a full, complete, and accurate representation of the original, including all official approvals; will be housed on one of the AAFP's secure computer servers; and will not be included in the same file as project data. Data and subject files will be stored in separate directories on the server and linked using a study ID. Only AAFP NRN staff and appropriate technical staff in the AAFP Information Technology Division will have access to these electronic files. Paper files scanned for storage purposes will be stored on a

secure, free-standing computer in a password-protected format. These scanned files will be backed up on an external hard drive or similar technology and stored in a separate locked location.

The information collected will be used for medical, statistical, and regulatory purposes related to the research study only. Personal information from study-related records will not be released without written permission. If confidentiality is inadvertently broken, study participants and their physicians will be notified by the principal investigator immediately.

## Data Destruction

After the six-year retention period has passed, or when a paper document has been scanned for electronic storage, the study- and grant-related documents must be effectively destroyed so that they are no longer accessible to anyone. The documents cannot merely be recycled or thrown away because the information would then still be viewable and available. Data destruction is the final step in the retention guidelines and must be carried out to complete the process.

The primary method for destroying records at the AAFP NRN will be shredding. For a small amount of paper records, shredding may be done on site at the AAFP NRN offices. For a large amount of paper records, the records will be boxed, secured with tamper-resistant tape, and shipped off site to the AAFP's Distribution Center to be shredded immediately.

Electronic data and documents will be cleared from the designated server using software products to overwrite media with non-sensitive data. Destruction of audiotapes, videotapes, and CDs/DVDs that contain electronic data and documents must involve either exposing the media to a strong magnetic field in order to disrupt the recorded magnetic domains, or destroying the media through incineration or shredding.

In all cases, steps will be taken to ensure records containing protected health information (PHI) (either paper or electronic) will be destroyed efficiently so that PHI is rendered unreadable and indecipherable, and cannot otherwise be reconstructed.