

## Retentions for COVID-Related Records

- The existence of a records series on the retention schedule does not require an agency to create that record.
- The retention periods apply to the record copy, whether it's paper or born digital.

### Items found in the Local Health Departments schedule

<https://archives.ncdcr.gov/government/local-government-agencies/local-health-departments-schedule>

- COVID records should be treated like any other communicable disease records.

### COVID contact tracing records (aka case interview forms)

**Note:** COVID-19 Community Team Outreach (CCTO) tool = proxy for NC EDSS

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| <p><b>COMMUNICABLE DISEASE OUTBREAK INVESTIGATION RECORDS</b></p> <p>Records concerning actions taken by local health directors and public health nurses to control the spread of a communicable disease. Includes copies of letters of notification of exposure sent out to child care facilities, restaurants, etc., outbreak summary reports, after action reports, and other related records.</p> | <p>a) Enter all required information for cases and contacts into the North Carolina Electronic Disease Surveillance System (NC EDSS). Any documents that are part of the investigation should be attached to the corresponding outbreak event in NC EDSS for retention; NC EDSS records are not scheduled for expiration or destruction at this time. Paper records may be destroyed once pertinent information is entered into NC EDSS.</p> <p>b) Destroy records supporting the expenditure of federal funds passed through NC DHHS on a fiscal year basis when the DHHS Office of the Controller provides written guidance that records are released from all audits and other official actions.<sup>1</sup></p> <p>c) Destroy in office after 10 years paper records not entered into NC EDSS.*</p> | <p>Authority:<br/>G.S. § 130A-140<br/>10A NCAC 41A .0103</p> <p>Confidentiality:<br/>G.S. § 130A-143</p> |
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### COVID surveillance reports

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| <p><b>COMMUNICABLE DISEASE REPORTS</b></p> <p>Part 1 and Part 2 communicable disease report forms, morbidity forms, supplemental surveillance forms, and other related records concerning reports of communicable diseases and information on patients' risk factors. Also includes reports of viral hepatitis and sexually transmitted diseases (STDs)/sexually transmitted infections (STIs).</p> | <p>a) Enter required information into the North Carolina Electronic Disease Surveillance System (NC EDSS). Any documents that are part of the investigation should be attached to the corresponding outbreak event in NC EDSS for retention; NC EDSS records are not scheduled for expiration or destruction at this time. Paper records may be destroyed once pertinent information is entered into NC EDSS.</p> <p>b) Destroy records supporting the expenditure of federal funds passed through NC DHHS on a fiscal year basis when the DHHS Office of the Controller provides written guidance that records are released from all audits and other official actions.<sup>1</sup></p> <p>c) Destroy in office after 10 years paper records not entered into NC EDSS.*</p> | <p>Authority:<br/>G.S. § 130A-140<br/>10A NCAC 41A .0103</p> <p>Confidentiality:<br/>G.S. § 130A-143</p> <p>Retention:<br/>NC DHHS, Division of<br/>Public Health<br/>Communicable<br/>Disease Manual</p> |
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COVID vaccine administrations (also including pre-vax checklists, declination waivers for post-vax observation period)

**Note:** COVID-19 Vaccine Management System (CVMS) = proxy for NCIR

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| <p><b>IMMUNIZATION RECORDS</b><br/>Immunization records for patients served by the local health department.</p> | <p>a) Destroy in office immunization records 1 year after entry in the North Carolina Immunization Registry (NCIR).<br/>b) Destroy in office immunization records not entered in the NCIR after patient's death and 10 years from date of last service, whichever is later.</p> | <p>Authority:<br/>G.S. § 130A-153</p> |
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COVID vaccine consent forms

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| <p><b>IMMUNIZATION CONSENT FORMS</b><br/>Consent forms completed by individuals receiving yearly influenza or other inoculations.</p> | <p>a) Transfer consent forms containing immunization information (dose details, etc.) to <b>IMMUNIZATION RECORDS</b>, page 36, item 3.<br/>b) Destroy in office remaining consent forms with HIPAA section after 6 years.<br/>c) Destroy in office remaining consent forms without HIPAA section after 3 years.</p> | <p>Retention:<br/>45 CFR 164.530(j)(2)</p> |
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COVID vaccine inventories

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| <p><b>VACCINE PROGRAM MANAGEMENT RECORDS</b><br/>Forms, reports, and policies required to document the storage, handling, transfer, and inventorying of vaccines.</p> | <p>a) Destroy records supporting the expenditure of federal funds passed through NC DHHS on a fiscal year basis when the DHHS Office of the Controller provides written guidance that records are released from all audits and other official actions.<sup>1</sup><br/>b) Destroy in office remaining records after 5 years.*</p> |
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Medical release from physician for vaccination

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| <p><b>PATIENT SELF-HISTORIES AND RECEIVED MEDICAL RECORDS</b><br/>Preliminary medical information collected concerning patients served by the local health department. May include patient self-histories and health surveys, including family medical histories, known health conditions, and allergies; copies of medical records; and referrals received from other agencies.</p> | <p>a) If individual receives clinical services transfer records to <b>PATIENT CLINICAL RECORDS</b>, page 36, item 5, as applicable.<br/>b) Comply with agency policy for patient notification. If unable to locate patient, destroy in office when reference value ends. †<br/>Agency Policy: Destroy in office after _____</p> |
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Patient appointment records

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| <p><b>PATIENT APPOINTMENT AND SCHEDULING RECORDS</b></p> | <p>Destroy in office when reference value ends. †<br/>Agency Policy: Destroy in office after _____</p> |
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Patient clinical records

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| <p><b>PATIENT CLINICAL RECORDS</b><br/> Clinical records for all patients served by the local health department. Files includes both paper and electronic health records. Also includes x-rays and other diagnostic reports.</p> <p>See also <b>SEXUALLY TRANSMITTED DISEASES (STD)/SEXUALLY TRANSMITTED INFECTIONS (STI) (CLINICAL) RECORDS</b>, page 37, item 8, and <b>TUBERCULOSIS (CLINICAL) RECORDS</b>, page 38, item 9.</p> | <p>a) Adult patients: Destroy in office 10 years from date of last service.*</p> <p>b) Pediatric patients: Destroy in office when individual reaches 30 years of age and has not received services within the last 10 years. If individual has received services within the last 10 years, follow disposition instructions for adult patients.*</p> <p>c) Deceased patients: Destroy in office 10 years from date of last service.</p> | <p>Retention:<br/> G.S. § 1-15</p> |
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Transitory records (e.g., a contact tracer didn't have access to CCTO and took notes on paper that were then entered into CCTO)

***Q. What if I have forms designed and used solely to create, update, or modify records in an electronic medium?***

**A.** If these records are not required for audit or legal purposes, they may be destroyed in office after completion of data entry and after all verification and quality control procedures. However, if the forms contain any analog components that are necessary to validate the information contained on them (e.g. a signature or notary's seal), they should be retained according to the disposition instructions for the records series encompassing the forms' function.

See also the State Archives of North Carolina's guidance on digital signatures found at: <https://archives.ncdcr.gov/documents/digital-signature-policy-guidelines>

Reference value

All local government agencies and the Department of Natural and Cultural Resources agree that certain records series possess only brief administrative, fiscal, legal, research, and reference value. These records series have been designated by retention periods that allow these records to be destroyed when *"reference value ends."* All local government agencies hereby agree that they will establish and enforce internal policies setting minimum retention periods for the records that Natural and Cultural Resources has scheduled with the disposition instruction *"destroy when reference value ends."* If a local government agency does not establish internal policies and retention periods, the local government agency is not complying with the provisions of this retention schedule and is not authorized by the Department of Natural and Cultural Resources to destroy the records with the disposition instruction *"destroy when reference value ends."*

**Items found in the General Schedule for Local Government Agencies**

<https://archives.ncdcr.gov/government/local-government-agencies/general-records-schedule-local-government-agencies>

Building cleaning records

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| <p><b>FACILITY MAINTENANCE, REPAIR, AND INSPECTION RECORDS</b><br/>Records documenting maintenance, repair, and inspection of agency-owned facilities.</p> <p>See also <b>CONTRACTS, LEASES, AND AGREEMENTS</b>, page 45, item 8.</p> | <p>a) Destroy in office records documenting routine inspections, janitorial cleaning, environmental monitoring, and routine maintenance of facilities after 1 year.</p> <p>b) Destroy in office records documenting system repair and improvement (including plumbing, electrical, fire, and other systems) after 3 years.</p> |
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Employee symptom checklists

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| <p><b>MEDICAL RECORDS</b><br/>Records concerning asbestos, toxic substances, and bloodborne pathogen exposure; medical examinations required by state or federal law; and records of injury or illness. (Does not include worker’s compensation or health insurance claim records.)</p> | <p>a) Destroy in office exposure records 30 years after date of exposure.*</p> <p>b) Destroy in office records pertaining to first-aid job-related illness and injury after 5 years.</p> <p>c) Provide medical records to employees who have worked for less than 1 year at time of separation.</p> <p>d) Destroy in office after 1 year records concerning physical examinations or health certificates.</p> <p>e) Destroy in office remaining records 30 years after employee separation.</p> <p><i>Retention Note: Records must be maintained separately from an employee’s personnel jacket. If part of a worker’s compensation claim, follow disposition for WORKERS’ COMPENSATION PROGRAM CLAIMS, page 66, item 50.</i></p> | <p>Authority:<br/>29 CFR 1910.1020(e)</p> <p>Confidentiality:<br/>29 CFR 1630.14(c)(1)<br/>29 CFR<br/>1910.1030(h)(1)(iii)</p> <p>Retention:<br/>29 CFR 1627.3(b)(1)(v)<br/>29 CFR 1910.1020(d)<br/>42 USC 12112(d)(3)</p> |
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Purchase orders for PPE or cleaning supplies

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| <p><b>PURCHASE ORDERS</b><br/>Records, forms, packing slips, and attached documents concerning purchased supplies, equipment, and services.</p> <p>SEE ALSO: Grants: Financial (above).</p> | <p>Destroy in office after 3 years.*</p> <p><i>Retention Note: Packing slips may be destroyed upon verification of items received if they are not the only record of the purchase of the item.</i></p> |
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Symptom checklists for agency visitors/attendees at agency meetings

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| <p><b>LOGISTICS MATERIALS</b><br/>Records concerning scheduled plans of agency personnel. Includes routine notices, task lists, and arrangements.</p> | <p>Destroy in office after 1 year.</p> |
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Waivers for attending agency events

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| <p><b>RELEASE FORMS</b><br/>Records documenting consent and waiving the individual's right to hold the agency responsible for injuries or damages occurring while voluntarily participating in events or activities</p> | <p>Destroy in office 5 years after termination of release/waiver.</p> |
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## General procedures for scanning paper records and retaining them electronically

**Note:** This process is not required for procedures laid out in the LHD schedule for entering data into NC EDSS

1. Approve the Local Health Department and Local General schedules
2. Document your electronic records policy and get it approved by DNCR (sample available at <https://archives.ncdcr.gov/government/local-government-agencies/erecs-local-government>)
3. Submit a Request for Disposal of Original Records Duplicated by Electronic Means for approval at DNCR (form available in sample policy and at <https://archives.ncdcr.gov/government/digital-records/digital-records-policies-and-guidelines/request-disposal-original-records-duplicated-electronic-means>)

Courtney Bailey

DNCR Records Analyst

[courtney.bailey@ncdcr.gov](mailto:courtney.bailey@ncdcr.gov)

919-814-6918 (O)

919-480-1998 (M)