ALTEA MEDICAL LLC

DEPARTMENT: Compliance	**POLICY:** E-30
PAGE: 1 of 6	**REPLACES POLICY DATED:** N/A
EFFECTIVE DATE: July 15, 2026	**APPROVED BY:** Karim Salamatian

PATIENT RECORDS MANAGEMENT AND RETENTION

I. PURPOSE:

The purpose of this policy is to establish guidelines relating to the maintenance, retention, and destruction of patient records of Company's affiliated practices. This policy applies to all patient records in paper or electronic format ("Patient Records"). See the Business Records Management and Retention Policy for information on the management and retention of business records.

II. POLICY:

All Patient Records belong to the affiliated practices or the providers in accordance with state law. Company will provide custodial services with respect to Patient Records and assist its affiliated practices in maintaining such records in accordance with applicable state and federal laws and regulations and contracts with insurers. Company will maintain Patient Records for (i) a minimum of ten (10) years after the date of creation for adult patients and ten (10) years after a minor patient reaches the age of majority (as designated under state law), or (ii) the minimum retention period prescribed by state law as set forth in the attached Appendix. Additionally, all affiliate practices providing services to Medicare Advantage beneficiaries must retain those records for a period of ten (10) years after the record was last in effect.

III. PROCEDURES:

A. Patient Records Management and Destruction

1. Company will designate a patient records coordinator (the "Patient Records Coordinator"), whose primary responsibility is to ensure that Patient Records of the affiliated practices are retained and destroyed in accordance with this policy.

2. The Patient Records Coordinator, in consultation with the Compliance Officer and legal counsel, will establish a Patient Records Retention Schedule to set forth the minimum period Patient Records must be retained for Company's affiliated practices based on the state in which they are located.

3. The Patient Records Coordinator will maintain documentation identifying all Patients Records held in off-site storage and the corresponding retention dates.

4. The Patient Records Coordinator is responsible for tracking costs and coordinating the destruction of off-site Patient Records.

5. Upon the expiration of the required retention period as set forth in the Patient Records Retention Schedule, the Patient Records Coordinator may destroy the records as follows:

   a. For on-site paper Patient Records, the Patient Records Coordinator may personally destroy (e.g. by shredding) such records or engage a reputable third party records destruction company.

   b. For off-site paper Patient Records, the Patient Records Coordinator will request destruction of such records in accordance with the terms of the agreement with the off-site storage vendor.

   c. For electronic Patient Records, the Patient Records Coordinator will coordinate with either the IT Department or the third party electronic storage vendor.

   d. In all instances, the Patient Records Coordinator will maintain written documentation of any destruction (including any confirmation from third parties), signed and dated by the Patient Records Coordinator, and scanned in relevant computer system as an electronic business record to be maintained for 5 years.

B. Records Retention and Disposal Requirements

1. The Patient Records Coordinator must ensure that no electronic or paper Patient Record is destroyed prior to the period of time indicated on the Patient Records Retention Schedule.

2. Any Patient Records held off-site will be discarded by the storage company in accordance with this policy.

3. The Patient Records Coordinator is responsible for processing and documenting the destruction of electronic Patient Records in the same manner as paper records.

4. The Patient Records Coordinator will request and receive written confirmation of any destruction of Patient Records from the storage company. The written confirmation shall be scanned and maintained as a Business Record for a period of 5 years with the hard-copy shredded for disposal. See Business Records Management and Retention Policy.

C. Legal Hold

In the event an affiliated practice receives a “legal hold” notice for Patient Records due to a subpoena, government investigation, or involvement in a legal matter, the

Patient Records Coordinator must be immediately notified. Upon receipt of such notice, the Patient Records Coordinator shall determine if the practice has possession of the relevant Patient Records and its location and the format. If the requested record is located, it must be retained in a secured location (either on-site or off-site) separate from other Patient Records and clearly marked for "legal hold" exempt from the application of the Patient Records Retention Schedule. If the Patient Record Coordinator cannot locate the requested record after a thorough search, he/she shall notify the appropriate individuals within the practice and legal counsel.

IV. QUESTIONS:

Should you have any questions, comments, or concerns about this policy and associated procedures, we encourage you to raise them with your manager, the Compliance Officer, or through our Compliance Hotline (compliance@alteahc.com).

Appendix

State-Specific Patient Record Retention Requirements

The following table summarizes minimum record-retention periods for adult and minor patient records by state. Requirements vary by provider type (e.g., physician office vs. hospital) and are periodically amended; the citations below should be independently verified against the current text of each statute or regulation before use.

State	Adult Patient Records — Retention Period	Minor Patient Records — Retention Period	Statutory / Regulatory Basis
Alabama	7 years	2 years after age 19 or 7 years (whichever is longer)	Ala. Admin. Code r. 540-X-9-.10
Alaska	7 years	2 years after age 19 or 7 years (whichever is longer)	Alaska Stat. 18.20.085
Arizona	6 years	3 years after age 18 or 6 years (whichever is longer)	Ariz. Rev. Stat. 12-2297
Arkansas	10 years	10 years or 2 years after age 18 (whichever is longer)	Ark. Code R. 007.05.17
California	7 years	1 year after age 18 (minimum 7 years)	Cal. HSC 123145
Colorado	10 years	Until age 28 or 10 years after use (whichever is longer)	6 CCR 1011-1
Connecticut	7 years (physicians)	Not specified	Conn. Agencies Regs. 19a-14-42
Delaware	7 years (physicians)	Not specified	Del. Code tit. 24, 1761
District of Columbia	5 years	5 years after majority	D.C. Code 3-1210.11
Florida	5 years	Not specified	Fla. Stat. 395.3025
Georgia	10 years (physicians)	5 years after majority	O.C.G.A. 31-33-2
Hawaii	7 years	7 years after age 18	Haw. Rev. Stat. 622-58
Idaho	5 years (hospitals)	Not specified	Idaho Code 39-1394
Illinois	10 years	Not specified	735 ILCS 5/8-2001
Indiana	7 years	Until age 21 or 7 years after use (whichever is longer)	410 IAC 15-1-9
Iowa	7 years	1 year after age 18	Iowa Admin. Code 653-13.7
Kansas	10 years	1 year after majority	Kan. Admin. Regs. 28-34-9a
Kentucky	6 years (hospitals)	Until age 21 or 6 years after use (whichever is longer)	902 KAR 20:016
Louisiana	6 years (physicians); 10 years (hospitals)	Not specified	La. Rev. Stat. 40:2144
Maine	7 years	6 years after age 18	10-144 CMR ch. 112
Maryland	5 years	Until age 25 or 5 years after use (whichever is longer)	COMAR 10.01.16.04
Massachusetts	7 years (physicians); 20 years (hospitals)	7 years or until age 18 (whichever is longer)	Mass. Gen. Laws ch. 111, 70

State	Adult Patient Records — Retention Period	Minor Patient Records — Retention Period	Statutory / Regulatory Basis
Michigan	7 years; 15 years (sensitive exams)	Not specified	MCL 333.16213
Minnesota	7 years (hospitals)	Not specified	Minn. Stat. 145.32
Mississippi	5 years	Not specified	30 Miss. Admin. Code 2635
Missouri	7 years (physicians); 10 years (hospitals)	Not specified	Mo. Rev. Stat. 109.255
Montana	6 years (physicians); 10 years (hospitals)	10 years after majority (hospitals)	Mont. Admin. R. 37.106.314
Nebraska	5 years	3 years after age of majority or 5 years after use (whichever is longer)	Neb. Rev. Stat. 71-8403
Nevada	5 years	Not specified	NAC 449.379
New Hampshire	7 years	1 year after age 18 (minimum 7 years)	N.H. Admin. Code He-P 802.20
New Jersey	7 years (physicians); 10 years (hospitals)	Until age 23 (hospitals)	N.J.A.C. 8:43G-15.2
New Mexico	10 years	Until age 21	N.M. Stat. Ann. 14-6-2
New York	6 years	Until age 18 or 6 years (whichever is later)	N.Y. Educ. Law 6530
North Carolina	11 years (hospitals)	Until age 30	10A NCAC 13B .3903
North Dakota	10 years	Until age 21 or 10 years (whichever is later)	NDAC 33-07-01.1-20
Ohio	6 years	6 years after age 18	Ohio Admin. Code 3701-83-19
Oklahoma	5 years	3 years past majority	OAC 310:667-19-14
Oregon	10 years	Not specified	Or. Admin. R. 333-505-0050
Pennsylvania	7 years	Until age 19 (1 year after majority)	49 Pa. Code 16.95
Rhode Island	5 years (hospitals); 7 years (physicians)	5 years after age 18	R.I. Gen. Laws 5-37-22
South Carolina	10 years	13 years from last treatment	S.C. Code Ann. 44-115-120
South Dakota	10 years	2 years after age of majority or 10 years after use (whichever is longer)	S.D. Admin. R. 44:73:09:06
Tennessee	10 years	1 year after age of majority or 10 years after use (whichever is longer)	Tenn. R. 1050-02-.18
Texas	7 years	Until age 21 or 7 years (whichever is longer)	22 TAC 163.2
Utah	7 years	4 years after age 18 (minimum 7 years)	Utah Admin. Code R432-100-33
Vermont	10 years	Until age 21 (hospital)	VT Code R. 946
Virginia	5 years (hospitals); 6 years (physicians)	Until age 23 (hospitals)	12 VAC 5-410-230
Washington	10 years	Until age 21 or 10 years (whichever is longer)	WAC 246-320-141

State	Adult Patient Records — Retention Period	Minor Patient Records — Retention Period	Statutory / Regulatory Basis
West Virginia	3 years (10 years recommended)	Not specified	W.Va. CSR 64-12-7.2
Wisconsin	5 years	Until age 19 or 7 years (whichever is longer)	Wis. Admin. Code Med. 21.03
Wyoming	3 years	Not specified	Wyo. Stat. 35-2-606

Notes

- "Not specified" indicates the cited authority does not set a distinct minor-record period; the general (adult) period and any applicable HIPAA/federal or contractual requirements should be applied. Retain the longer of any overlapping requirements.
- Where a state distinguishes between physicians and hospitals, both figures are shown. Aarista and its affiliated entities should apply the standard corresponding to their operating license and setting.

This appendix is provided for internal compliance reference only and does not constitute legal advice. Confirm all periods and citations with current authority and legal counsel.