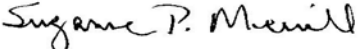


DAAS ADMINISTRATIVE LETTER NO. 16-11

To: Area Agencies on Aging Administrators  
Community Service Providers for Grants Administered by Area Agencies on Aging

From: Suzanne P. Merrill, Director 

Subject: Updated Policies on Records Management:

1. Replacement Policies for Section 1000 (Client Confidentiality) & Section 2000 (Retention of Records) of the AAA Policies and Procedures Manual
2. Replacement Policies for Section XIII (Retention of Records) and Section XVIII (Confidentiality) of the HCCBG Policies and Procedures Manual for Community Service Providers
3. New Policies and Procedures on Electronic Records and Signatures for Both Manuals

Date: August 9, 2016

A major updating of the policy and procedures manuals for Area Agencies on Aging (AAAs) and community service providers is underway. Because many current policies and procedures are found in both manuals with the same wording or similar intent, the Division is merging the two manuals into a single Policies and Procedures Manual for AAAs and for community service providers with grants administered by AAAs. The grants administered by AAAs to which the new policy manual will apply include the Home and Community Care Block Grant, the Family Caregiver Support Program, Project C.A.R.E, III-D evidence-based health promotion programs, and senior center funding.

Because this major undertaking will take place in stages, the revised and merged policy manual will be released as individual sections over the course of several months. The Division is working to create a webpage for posting new sections of the manual as they are available. Attached please find the first installment of the revised and merged policy manual – Section III, updated policies on records management, which address:

- Record Retention
- Confidentiality and Security
- Electronic Records and Electronic Signatures

Effective immediately, agencies should replace the necessary sections in existing policy manuals and add the new section on e-records to both manuals until the complete revision of the merged policy manual is available for use. Notes on changes:

- There are no major new requirements in the updated record retention policies and procedures. Summary guidance from the State Archives and the DHHS record retention webpages has been incorporated into the policy manual, and links to those websites are provided for additional information and resources. Agencies are advised to reacquaint themselves with core requirements for public records access, protection of confidential information in public records, and authorized methods of destruction of records on their purge dates.
- Policies on safeguarding the confidentiality/security of information are unchanged except that the current requirement for training individuals who have access to client information has been made into an annual requirement. Other requirements have been reorganized or edited for clarity. A policy on security incidents and data breaches has been added. Substantial guidance has been inserted throughout this section, and links to information have been added to the text. While no policy manual can make requirements specific enough to guide an agency on locally specific policies, we hope that the information and links provided will offer sufficient direction to allow agencies to assess the information they store and transmit and consider necessary safeguards.

Area Agencies on Aging have worked with the Division to undertake the current updates and will be available to assist with questions and needed clarifications. If the Division can provide additional information, please contact Steve Freedman ([steve.freedman@dhhs.nc.gov](mailto:steve.freedman@dhhs.nc.gov)) or Phyllis Bridgeman ([phyllis.bridgeman@dhhs.nc.gov](mailto:phyllis.bridgeman@dhhs.nc.gov)).

SPM:pb

Attachment