

PGME Information Management and Records Retention Guidelines

Approval Authority: PGMEC

Established: Original date 2023 09 14

Amendments:

Category: (to be completed by the Univ Secretary)

Parent Policy: Handling Sensitive Electronic Information Policy

1.0 STATEMENT

NOSM University (NOSM U) Postgraduate Medical Education (PGME) recognizes the importance of maintaining secure storage and appropriate access to sensitive and confidential information. The PGME Information Management and Records Retention Procedure is to be used in conjunction with NOSM U's Handling Sensitive Electronic Information Policy. All rights and responsibilities articulated in NOSM U's Handling Sensitive Electronic Information Policy apply along with this Procedure and nothing in this Procedure derogates from the duties, protections and process established.

This guideline document along with the central *Handling Sensitive Electronic Information Policy*, are meant to provide PGME stakeholders with the necessary information to meet or exceed the General Standards of Accreditation for Institutions with Residency Program (CanRAC) where the following institutional accreditation standards apply:

2.2.3 A confidential system of resident and teacher information management is maintained.

2.2.3.1 There is an effective centralized policy for information management that addresses access, confidentiality, and information retention.

2.0 SCOPE

This policy applies to all users of NOSM U, PGME information, whether on-campus or when accessing from a remote location.

3.0 DEFINITIONS

For the purposes of this procedure:

3.1 Sensitive Data - Data, information, or intellectual property in which NOSM U has a legal interest or ownership right and is intended for only limited dissemination. This data, if compromised, could be expected to cause minor, short-term harm or embarrassment to the institution and/or individuals to whom the data refers.

3.2 Highly Sensitive Data - Data, information, or intellectual property which, if compromised, could cause significant and/or long-term harm to NOSM U. The major difference between Highly Sensitive Data and Sensitive Data is the likelihood, duration, and the level of harm incurred.

3.3 Personally Identifiable Information (PII) - Information relating to an individual that reasonably identifies the individual, either directly or indirectly. All PII is classified as highly sensitive information.

3.5 Research and Scholarly Data - Data collected, obtained, and used during the course of research and may be in the custody and control of the University. Includes original data, previously existing data sets, as well as the analysis, results, or dissemination resulting from the research process.

3.6 Electronic Data - Data that are stored, transmitted, or read in an electronic format such as a file on a drive or device, information in a database, or unstructured formats such as email.

4.0 PROCEDURES

Procedures for common types of electronic data used in PGME have been classified in the table below. It is the responsibility of all PGME Staff and stakeholders to utilize these procedures in conjunction with the central NOSM U policy.

4.1 PGME Resident Files

Postgraduate Medical Education Trainee Files typically include application forms, assessments, contract letters, curriculum vitae, evaluations, exam results, licensing information, lists of clinical rotations, publications, reference letters, reports and lists of presentations, transcripts, and related documentation and correspondence.

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Highly Sensitive, PII	Electronic data handled as per the NOSM U Policy	(60) years after the end of training	Destroy

4.2 PGME Residency Program Files

PGME Residency Program files are broken down into two categories of classification.

4.2.1 Postgraduate Medical Education Program Committee Files

Files typically include program committee terms of references, membership lists, agendas, minutes, other meeting materials (e.g., RPC and its subcommittees)

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Committee and Subcommittee Files: Highly Sensitive, PII	Electronic data handled as per the NOSM U Policy	Ten (10) years following previous external accreditation review.	Destroy

4.2.2 Postgraduate Medical Education General Program Files

Program-specific policies, guidelines, and procedures, program organizational charts, accreditation reports and previous survey reports/letters, educational experiences information (this includes rotation objectives, curriculum maps, AHD curricula, mandatory rotation lists, etc.), lists of resident publications/scholarly activity/projects, and other related documentation and correspondence.

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Sensitive	Electronic data handled as per the NOSM U Policy	Ten (10) years following previous external accreditation review.	Destroy

4.2.3 CaRMS and Selection Files

Residency programs and PGME must follow the policies of the Canadian Resident Matching Service (CaRMS) as they relate to the retention and destruction of candidate records and applications.

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Highly Sensitive, PII	Electronic data handled as per the NOSM U Policy	One (1) year following the CaRMS/Selection Match Date	Destroy

4.3 PGME Office and Operational Files

PGME Office and operational files are broken down into three categories of classification.

4.3.1 Postgraduate Medical Education Committee Files

Files typically include program committee and subcommittee terms of references, membership lists, agendas, minutes, other meeting materials (e.g. PGMEC and its subcommittees)

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Sensitive	Electronic data handled as per the NOSM U Policy	Ten (10) years following previous external accreditation review.	Destroy

4.3.2 Postgraduate Medical Education – Central Resident Files

Including PGME appeals, Education Advisory Board Files, Registration and Assessment/Evaluation Files.

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Highly Sensitive, PII	Electronic data handled as per the NOSM U Policy	(60) years after the end of training	Destroy

4.3.3 Postgraduate Medical Education Office General Files

PGME policies, guidelines, and procedures, organizational charts, accreditation reports and previous survey reports/letters and other related documentation and correspondence.

Responsibility	Classification	Storage and Distribution	Retention	Disposal
PGME	Sensitive	Electronic data handled as per the NOSM U Policy	Ten (10) years following previous external	Destroy

			accreditation review.	
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4.4. PGME Resident Research Data

NOSM University requires all research, innovation and scholarly inquiry conducted by its faculty, staff, and learners, and under its auspices be performed in the most rigorous and responsible manner. All files related to research should follow the *Responsible Conduct of Research Policy* and related documents.

RELATED DOCUMENTS

University Documents and Information

- NOSM U's Handling Sensitive Electronic Information Policy

FIPPA Policies and Protocols

- [Collection of Personal Information Protocol](#)
- [Information Access and Protection of Privacy Policy](#)
- [FIPPA Delegation of Authority Protocol](#)
- [Records Retention Policy](#)

Forms

- [Request to Access Information](#)
- [IPC Appeal Form](#)
- [IPC Privacy Complaint Form](#)
- [Informed Consent for Disclosure of Personal Information](#)
- [NOSM Records Destruction Form](#)

Legislation and Information

- Freedom of Information and Protection of Privacy Act

AUTHORITIES AND OFFICERS

The following is a list of authorities and officers for this guide:

- a. Approving Authority: PGMEC
- b. Responsible Officer:
- c. Procedural Authority:
- d. Procedural Officer:

Review and Revision History

Review Period: 1 year or as required

Date for Next Review: 2024 09