

PROTECTING DOCUMENTS AND DATA

Applicability: This policy applies to all Oak Hill employees.

Oak Hill relies on accurate and truthful data in order to make sound business decisions, provide services to our program participants and comply with legal obligations, among other things. We are required by the federal and state agencies with whom we do business to create and maintain truthful and complete financial information regarding all of our transactions and business activities. As a result, all employees must do their part to ensure that documentation is truthful, complete, retained consistent with our policies and complies with our internal controls.

Accordingly, all documents, including but not limited to: business records, time sheets, expense accounts, financial reports, budgets, marketing information, development activity, program records, medical records, educational records, personnel and benefit information, must be accurate, truthful and complete.

Business records may become subject to audits or public disclosure in the course of litigation, governmental regulation or investigations. Therefore, documentation should include only factual information, and not characterizations, opinions, inappropriate language or legal conclusions.

Oak Hill also has a Document Retention Policy that sets forth the manner and length of time certain documents must be retained. All employees must be aware that in the event that Oak Hill becomes the subject of an investigation or served with a subpoena, a "litigation hold" will be issued by the General Counsel concerning the relevant documents. A "litigation hold" means that no business records covered by the litigation hold may be destroyed until further notice by the General Counsel.

Cross-Reference: Standards of Conduct and Workplace Behavior

Approved: June 12, 2008