



The Counseling Team International

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DECLARATION OF COMPLIANCE WITH DEA EAP RECORDS RETENTION & DISPOSAL POLICY IN ACCORDANCE WITH FEDERAL FISCAL YEAR 21

November 22, 2021

TO: All TCTI subcontractors working on the DEA EAP contract

FROM: Amanda Steiger, LMFT, Administrative Clinician, DEA EAP

Dear DEA EAP Clinician,

We are anticipating our annual office visit from the DEA EAP Administration soon. During this visit, a random sample of redacted case files is reviewed by the EAP Administrator for accuracy, legal/ethical compliance, and retention practices. In accordance with the DEA EAP contract, all DEA EAP records are to be destroyed three years after the date of the last counseling session. During this visit, the DEA EAP Administrator also witnesses the destruction of stored case files by a licensed, bonded, and insured records destruction company hired by TCTI.

This process of record keeping, retention, and disposal is a part of TCTI's performance review process and a crucial component of our adherence to the legal and ethical standards we have committed to uphold per our contract with the DEA. I have referenced the policy contained in our contract with the DEA below, which includes one exception. If one of your cases were to ever be exempted, you would be notified immediately and instructed on how to proceed. This is a very rare occurrence and is unlikely to impact most clinicians.

RECORDS RETENTION AND DISPOSAL POLICY: Records are retained during their useful life in accordance with the records retention schedules approved by the National Archives and Records Administration. All records regardless of the storage medium are destroyed **three** years after the date of the last counseling session, unless a longer retention period is necessary because the EAP has actual notice of an administrative or judicial proceeding specific to the client. In such cases, the records are retained for six months after the conclusion of the proceedings. Destruction is by EAP personnel. Paper records are destroyed through the use of a high-grade shredder. Any electronic storage device that was used to store sensitive EAP information is degaussed before it is discarded, transferred, or donated outside the EAP.

In accordance with the Records Retention and Disposal Policy outlined above, please complete the attached declaration **once you have pulled and destroyed any and all DEA EAP counseling records** dated on, or prior to September 31, 2018. **These EAP case records/authorizations would begin with 1800XXXX.** Please comply with the Records Retention and Disposal policy, including the destruction of EAP records, sign, and return to TCTI via fax or email to Julia Fagan, LCSW jfagan@thecounselingteam.com by December 30, 2021.

DECLARATION OF COMPLIANCE WITH DEA EAP RECORDS RETENTION & DISPOSAL POLICY IN ACCORDANCE WITH FEDERAL FISCAL YEAR 21

I, _____ declare that I am a licensed
(Print name)
_____ in the state of _____ and a subcontractor for The
(LMFT/LCSW/PhD, etc)
Counseling Team International, working on the DEA EAP contract. In accordance with the DEA EAP
Records Retention and Disposal Policy "Department of Justice Employee Assistance Program (EAP)
Records," JUSTICE/DOJ-015, I attest that I have destroyed all DEA EAP records dated prior to September
31, 2018 (Case# 1800XXXX) through means of a high-grade shredder and proper disposal.

(Printed name/credentials/licensure)

(License Number)

(State of License)

I attest through my signature below that any and all DEA EAP records dated prior to September 30, 2018 in my possession were destroyed and properly disposed of.

on _____.
(Date: XX/XX/2021)

(Signature)

(Date)