***Sample* RECORDS MANAGEMENT POLICY *Sample***

***Purpose***

The purpose of this policy is to ensure that necessary records and documents are adequately maintained and protected, and to ensure that records are properly discarded at the appropriate time. Records management and retention policies apply to all records, regardless of format, whether they be paper, electronic, or microform, and other more traditional media. The PHA encourages record retention in an electronic format whenever feasible.

***General Policy***

It is the PHA's policy to comply with state and federal laws with respect to privacy and with respect to responding to public information requests. The PHA will retain records in a manner consistent with HUD’s prescribed retention schedules and the State of \*MyState\* retention guidelines. Data may be retained in electronic or paper format. The PHA will secure personnel and resident/participant data in a manner so as to restrict access to only personnel authorized by the Executive Director, and at no time shall such records, regardless of format, be left available for public inspection. At all times EIV data will be protected in accordance with HUD requirements.

***Legal Action***

In the event of current or pending litigation, legal counsel will be sought regarding applicable documents. If litigation is pending, all applicable documents and records, regardless of disposal dates, will be retained until resolution of the legal matter.

***Back Up of Electronic Data***

Computer data will be backed-up to avoid loss of important information due to equipment failure, disaster, or virus. Files should be backed up daily to an off-site location. Backups should be encrypted during transport and storage. Backups should be capable of versioning and point in time recovery. Email should be stored in a business quality email archiving system.

***Security***

Paper files will be stored in file cabinets with limited access. HUD recommends locking, fire proof file cabinets behind a locked door.

Electronic files will be stored in a secure manner and only available to authorized personnel. File sharing, security and virus protection should follow industry best practices.

***Records Disposition And Destruction***

Records may be retained for a longer duration than the schedule listed above but must be retained for a minimum of the schedule. The PHA may, at its discretion, retain documents indefinitely.

Confidential records shall be destroyed as follows:

**Paper records**

1. Shredding through a properly bonded shredding agency, or

2. Shredding on-site

**Electronic records**

1. Shredding CDs, DVD’s, etc.

2. Use of US Department of Defense-approved data erasing software for secure removal of electronic files on hard drives, USB sticks, floppy disks and other storage mediums.

***Records Retention Schedule***

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| **DESCRIPTION** | **RETENTION** |
| **ADMINISTRATIVE DOCUMENTS AND CONTRACTS** | |
| Administrative Policies | Old policies that have been replaced with updated version: keep 5 years |
| Agency Plan Documents and correspondence | Old documents replaced in file by new documents: keep in storage 3 years |
| Annual Contributions Contracts and Amendments | Permanent |
| Annual Reports and other agency major publications | Permanent |
| As-Built Drawings/Plans of Developments, surveys | Permanent |
| Board Meetings: Minutes, Resolutions, Certificates   * Open Meeting Notices * Agendas (open or closed) * Audio tapes of closed meetings * Audio tapes of open meetings for which minutes are prepared | Permanent  2 years  2 years  2 years  90 days after minute approval |
| By-Laws and Amendments | Permanent |
| CFP Contracts and attending documents | Permanent |
| Other Grants and attending documents | Permanent |
| Complaints from Public | 2 years after resolution or dismissal of complaint |
| Contracts for Services (A & E, Audits, Accounting, etc) | Permanent |
| Cooperation Agreement and Amendments | Permanent |
| Correspondence - related to policies/procedures | Permanent |
| Correspondence - general | 2 years after audit |
| Deeds, Surveys, related correspondence | Permanent |
| Energy Audits | 10 years from completion of service or work performed |
| General Depository Agreements | Permanent |
| Insurance Policies/Bonds | 10 years after expiration date |
| Insurance Register | 6 years after audit |
| Legal Documents and Matters | Do Not Dispose without legal counsel |
| Maintenance Wage Rates and Labor Relations Docs | 3 years following date of completion of contract |
| Oaths of Office | Until superseded plus 5 years |
| Organizational Docs (resolutions, etc) | Permanent |
| Payment in Lieu of Taxes Waivers, if applicable | Permanent |
| PHAS/SEMAP reviews, reports, backup documentation, surveys | Old documents that have been replaced in file by new documents: keep 3 years |
| Physical Needs assessment | 10 years following completion of service or work performed |
| Procurement-related  Documents | 10 years from completion of service or work performed |
| Tax Exemption Certificates | Permanent |
| Unsuccessful bids | Permanent |
| Vehicle/Trailer Titles | Dispose when title transferred or otherwise disposed of |
| Vehicle Records | keep until title transfer or disposal |
| Warranties | Keep until equipment disposed of or sold |
| **PERSONNEL RECORDS** | |
| Personnel Policy | Permanent |
| Employee Handbook | Permanent |
| Contractors' Payroll | 3 years following date of completion of contract |
| Direct Deposit Forms SF-1199A | 3 years after employee separation |
| Employee Applications - Unsuccessful | 6 months from date of application |
| Employee Job Descriptions | 3 years after position is abolished or suspended |
| Employee Leave Files | 4 years after audit |
| Employee Personnel Files and records | 10 years after employee separation |
| FICA receipts | 4 years after audit |
| Form 941 | 4 years after audit |
| Payroll Records/W2s | 4 years after audit |
| Time Sheets | 4 years after audit |
| Unemployment Records/Claims | 10 years |
| Worker's Compensation records/Claims | 10 years |
| **FINANCIAL/ACCOUNTING RECORDS** | |
| Adjustments Journal | 10 years |
| Adjustment Slips | 2 years after audit |
| Audit Reports | Permanent |
| Bank Statements/Cancelled Checks | 6 years |
| Budget documents | Permanent |
| Cash Receipts (rent, security deposits, other income) | 3 years after audit |
| Check vouchers with support documentation | 6 years |
| Collection Losses and Charged-Off Tenant Account Records | Transfer to storage after audit; keep 10 years |
| Direct Deposit Forms Form 1199-A (authorizing federal fund deposits) | Permanent |
| e-LOCCS authorization forms (27054) | Permanent |
| General Ledger. Cash Receipts/ Cash  Disbursements registers | 10 years |
| Inventory of Expendable Equipment and non-Expendable Equipment, Material and Supplies | Permanent |
| Inventory of Non-Expendable Equipment | 3 years after item is disposed |
| Investment Records | 10 years after fiscal year end or investment maturity, if longer |
| Journal Vouchers | 4 years |
| Monthly income and expense reports general ledger and trial balance | 4 years after audit |
| PILOT Computation | Permanent |
| Public Housing Development Cost Records | Permanent |
| Public Housing Bond-related documents related to original development | Permanent |
| Property Ledger | Permanent |
| Property (Other) disposition records: bid and contract forms, bills of sale, etc. | Permanent |
| Property (Real) disposition records including adjustments | Permanent |
| Rent Roll Control | 4 years after audit |
| Tenant Accounts Receivable and Security Deposit Ledger - Non-Active | 4 years after audit |
| Tenant Accounts Receivable (TAR) Schedule | 4 years after audit |
| Tenant and HAP Register | 4 years after audit |
| Tenant Security Deposit Records | 4 years after audit |
| Tenant Refund of Security Deposit Request | 4 years after audit |
| **OCCUPANCY RECORDS** | |
| Applications - Pending and Eligible | Keep until family admitted; add to family file |
| Applications - Selected | Add to family file |
| Applications - Withdrawn and ineligible | 3 years from ineligibility determination |
| Hearing Documents/noncitizens | 5 years minimum |
| Correspondence on routine maintenance and management (keep copies in tenant files) | 2 years after audit |
| Criminal Background Check Results | Shred immediately following determination unless appealed; then destroy after appeal decision |
| Drug Abuse Treatment Information | Shred immediately following determination unless appealed; then destroy after appeal decision |
| EIV printouts | 3 years after end of tenancy; then shred |
| Eviction Records | 10 years |
| Family files after admission to program | 5 years after end of program participation |
| Income Limits Schedule | 1 year after schedule is suspended and replaced |
| Reasonable Accommodation Requests if they contain medically sensitive information | Shred immediately following determination unless appealed; then destroy after appeal decision |
| Schedule of Rents Demonstration of Financial Feasibility and related (Sec 8) | 1 year after schedule is suspended |
| Unit Files (inspections, work orders, appliance info) | Permanent |
| Utility Allowance Schedules | When replaced, 4 years after audit |
| Waiting List | Permanent |

Disclaimer

Information contained in the sample policy was derived from a variety of sources including a sample policy from the Texas Housing Association, HUD documents, white papers, and technology best practices. Each state has additional laws and statues regarding document retention and open records requirements. Ultimate IT Guys does not imply any warranty, statement of completeness or support for use of the document. We recommend that before adopting this as the policy for your agency, it should be reviewed by your legal counsel or someone that is expert with HUD and open records law for your state.