



Series: Risk Management-QA **COA:** RPM 6.02
CFOP: 15-7
Procedure Name: Records Retention & Destruction
Procedure Number: RQ-504
Revision #/Date: (1)10/30/08
Effective Date: 4/15/2005

Applicable to: All CBCB Staff, Board of Directors and Subcontractors

SUBJECT: Records Retention and Destruction

PURPOSE: To ensure compliance with all applicable contract guidelines, State and Federal regulations, as well as to eliminate accidental or innocent destruction of records.

PROCEDURE:

Definitions

Records: Data in both paper and electronic formats.

References

CBC of Brevard (CBCB) contract with the Department of Children & Families (DCF) ("the Contract") GJ246 - Section I, Paragraph D.2;

Fair Labor Standards Act (FLSA), Americans With Disabilities Act (ADA), Age Discrimination in Employment Act (ADEA), Civil Rights Act of 1964 (CRA), Equal Pay Act (EAP), Family and Medical Leave Act (FMLA), Employee Retirement Income Security Act (ERISA), Occupational Health and Safety Administration (OSHA), Controlled Substances and Alcohol Use and Testing Act (CSAUT), Federal Insurance Contribution Act (FICA), and Fair Unemployment Tax Act (FUTA).

CFOP 15-7

CBCB Policies/Procedures: GOV-203, IT-805

Retention

The Contract between CBCB and DCF (section I, paragraph D.2) requires CBCB:

'to retain all client records, financial records, supporting documents, statistical records, and any other documents (**including electronic storage media**) pertinent to this contract for a period of six (6) years after completion of the contract. If an audit has been initiated and audit findings have not been resolved at the end of six (6) years, the records shall be retained until resolution of the audit findings or any

litigation which may be based on the terms of this contract, at no additional cost to the department. Records shall be retained for periods longer than six (6) years when required by law.'

Effectively, this means CBCB will keep all records pertinent to the Contract until a minimum date of June 30, 2015. Upon Contract renewal, all records will have to be kept until a minimum date of June 30, 2019.

CBCB uses the DCF records retention schedules, found in CFOP 15-7, as the basis for classifying records to be retained per Contract requirements.

In addition, some records may need to be kept longer based on specific legal, grantor, or contractual guidelines. Below is a list of records that will be retained longer than the DCF Contract guidelines:

<u>Document/Record</u>	<u>Retention Period</u>
Retirement eligibility, benefits and related documents	Indefinite
Discrimination related documents	Until final disposition
Adoption case files: Placement/Independent Placement	Permanent
Annual Reports, Governing Body	Permanent
Audits: State/Federal/Independent	10 years after completion
Legal Case Files	10 years after case closed
Minutes: Official Meetings (i.e. Board of Directors, etc.)	Permanent

Retention Exceptions

1. Non-Pertinent records: some records that are not considered pertinent to the Contract may only need to be kept for a period determined by CBCB. Such records include:

All duplicates of records	Useful lifespan
Drafts/working papers	Useful lifespan
Evacuation Drills	2 years
Mailing lists	Useful lifespan
Minutes, Other meetings	1 year
Staff sign up sheets	Useful lifespan
Visitor logs	1 year
Vehicle usage logs	1 year

2. Recruitment & Employment records: the Contract retention period generally exceeds the standard retention period required by federal regulations for these records. These are not necessarily pertinent to the Contract and need only be retained for the period established by the federal guidelines. These records are listed below:

Recruitment & Selection

Job Postings, advertisements	1 year
Applications for employment	2 years

Hiring records (including job applications, resumes and interview guides)	3 years
Job Offering and other hiring records	1-2 years
General Employment	
Promotions, demotions, transfers	1 year
Biographical/Demographic Data	3 years
Compensation & Benefits	
Payroll Records	3 years
Benefits	3 years
Retirement & Pension	4 years
Performance Evaluations	3 years
Work-Related injuries/illnesses	5 years
Layoffs	1 year
Terminations	1 year
Health and Medical	
Leave of Absence (medical)	3 years
Medical enrollment	3 years
Osha Logs and records	5 years
Other Documents	
Tax and withholding records	4 years

Long Term Storage of Records

CBCB retains the services of a document storage facility. Records that are not needed on a regular basis may be moved to this storage facility with the approval of the appropriate member of management at CBCB. The storage and retrieval process shall be maintained and disseminated to all CBCB administrative assistants by the Administrative Assistant to the CFO (AA-CFO). If staff experience difficulty in this process, they should contact the AA-CFO for guidance.

Destruction of Records

CBCB will retain the services of a record destruction company that provides locked storage boxes and regular pick ups and destruction of confidential materials at each facility. Any records to be destroyed should be placed in the designated shred boxes in order to ensure that no confidential information is released. Staff will contact the AA-CFO for assistance for any services needed outside the regularly scheduled pickups.

Destruction of records that are in a paper format will be accomplished by shredding. Destruction of records that are in an electronic format will be completed in a fashion that is most practical and affordable considering the storage medium. All destruction of records, regardless of the composition, will ensure that the information it contains shall not be readable or retrievable.

Verification of all records destroyed must be provided by the record destruction company. This documentation will be filed with and maintained by the Business Manager.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation.

Responsible Parties

The following positions are responsible for the ongoing process of identifying records which have met the required retention period and to verifying their destruction:

Chief Operating Officer and their designee – Records pertaining to services provided by CBCB.

Chief Financial Officer and their designee – Records pertaining to finance, facilities or the CBCB IT network.

Chief Personnel & Administrative Officer or their designee – Records pertaining to human resources or miscellaneous administrative services.

No records that may be pertinent to the Contract will be destroyed without prior approval from the CEO and notification being sent to DCF. This includes Recruitment & Employment records.

Other records, not pertinent to the Contract, that have reached the end of their CBCB prescribed retention period, may be destroyed with approval from the appropriate CBCB Officer.

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:


DR. PATRICIA NELLIUS-GUTHRIE
Chief Executive Officer

Approval Date: 01/06/09