



Hillsdale Housing Commission
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Records Retention and Disposition Policy

Policy

It is the Hillsdale Housing Commission's policy regarding the retention and disposition of records to comply with local, state and federal laws. The Hillsdale Housing Commission will retain records in a manner consistent with HUD's proscribed retention schedules.

Data may be retained in electronic or paper format. The Hillsdale Housing Commission will secure 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's *EIV PHA Security Procedures Guidebook*, hereby incorporated into this policy by reference.

Purpose

The purpose of this policy is to ensure that necessary records and documents are adequately protected and maintained and to ensure that records that are no longer needed or of no value are discarded at the appropriate time.

Records management and retention policies apply to all records, regardless of format, whether they be paper, electronic, or microform (e.g., microfilm, microfiche, magnetic tapes, and CD-ROM), and other more traditional media. The Hillsdale Housing Commission encourages record retention in an electronic format whenever feasible.

Administration

The Executive Director is charged with the retention and disposition of Commission records. Records designated as permanent should specify a storage location. For example, the Annual Contributions Contract (ACC) should state, "Permanent, fireproof storage cabinet."

Adoption of this policy does not relieve or otherwise affect the pre-existing obligation to maintain records relating to a matter under litigation, government audit, or investigation. All such records should be preserved until the matter to which they relate has been finally resolved and the Executive Director and/or contracted legal counsel has approved their disposition.

Procedures

Records Retention

Electronic Records

- Electronic records shall be kept permanently or until such time that the Hillsdale Housing Commission is assured that those records are no longer necessary.
- Electronic records, past and present, shall be maintained in a manner consistent with HUD's *EIV PHA Security Procedures Guidebook* and with the Hillsdale Housing Commission's *Passwords and User ID Integrity Policy*, both of which are hereby incorporated into this policy by reference.
- Electronic records shall be periodically archived (at least once per fiscal year) from hard disk storage to removable storage such as CD, DVD, portable hard drives, etc.

Paper Records

- Paper records shall be periodically archived as needed (at least once per fiscal year) and placed in a secure location.
- The following record retention schedule shall be observed for paper records:

Record Type	Minimum Retention Length
Monthly Accounting reports, including General Ledgers, TAR's etc.	10 Years
Annual Contribution Contact (ACC) and Addendums	Permanent
Cancelled or Denied Applications	10 Years
Audits	Permanent
Bank / Financial Statements (checks, CD's, etc.)	10 years
Budgets	10 Years
Correspondence	10 Years or As Needed
Development & Modernization documents, including construction documents	Permanent
HUD Reports (PHAS/SEMAP) Mod., Occupancy, etc.	10 Years After Close of Fiscal Year
Legal Records, including Eviction Documentation and Policy Review	Permanent
Payroll / Payables	10 Years
Pension and Related Documents	Permanent

Personnel Records, including Tax, Pension, Benefit and related Documents	Permanent
Request for Proposals	10 Years
Tenant Move-Out Files	10 years
Work Orders	10 years

Records Disposition and Destruction

Following the schedule listed above, confidential records shall be destroyed in a manner consistent with measures to protect data. 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.

Acceptable destruction methods for paper records include:

1. Shredding through a properly bonded shredding agency, and,
2. Shredding on-site and burning the shredded documents off-site.

Acceptable destruction methods for electronic records include:

1. Shredding CDs, DVD's, etc.
2. Use of US Department of Defense-approved data erasure software.

Adopted by the Hillsdale Housing Commission 05/05/2007, Resolution #2007-20