RECORD RETENTION AND ASSET MANAGEMENT POLICY

PURPOSE

The purpose of the Record Retention and Asset Management Policy is to establish an efficient companywide record management system for maintaining, identifying, retrieving, preserving and destroying records. Additionally, to ensure that records are adequately protected, preserved and that records that are no longer needed or of no value are destroyed at the appropriate time, and manner in compliance with all applicable local, state, and federal laws and regulations.

SCOPE

This policy applies to all LADD employees and Business Associates relative to records generated in the course of LADD operations, including original documents, reproductions and electronic versions.

POLICY

It is the policy of LADD to establish procedures that adequately protect, maintain and destroy records that have been generated in the course of business and service operations; and provide a mechanism for reporting and resolving violations of this policy.

STANDARDS AND DEFINITIONS

Corporate Compliance Officer (CCO) – The CCO is responsible for the administration of this policy including directing subpoenas, requests for records, audits, external investigation, storage and disposal of records and assets and resolving complaints or reports of policy violation.

Protected Health Information (PHI) – Individually identifiable health information that is transmitted by electronic media, maintained in electronic form or that is maintained or transmitted in any other form. Info is PHI if it relates to physical/mental health or condition of an individual, provision of health care or payment for provision of health care.

Security of PHI – All locations, departments and business associates must protect PHI in accordance with relevant laws and the LADD HIPAA Privacy and Security Plan.

Suspension of Record Disposal in Event of Litigation or Claims – In the event LADD is served with any subpoena or request for record, or any employee becomes aware of a governmental investigation or audit concerning LADD or the commencement of any litigation against or concerning LADD, such employee shall inform the CCO and any further disposal of documents shall be suspended until such time the CCO, with the advice of counsel, determines otherwise

Physical Storage Facilities – Approved storage location that ensures the preservation of records in their original condition in a method that promotes efficient retrieval. Storage facilities must be secured against unauthorized access, maintain access logs and where applicable protect against pest infestation, fire, smoke, or water damage.

Correspondence, Internal Memoranda and Email – Most correspondence, internal memoranda and email should be retained for the same period as the document they pertain to or support. For instance, a letter pertaining to a particular contract would be retained as long as the contract (7 years after expiration). It is recommended that records supporting a particular project be kept with the project and take on the retention time of that particular project file.

- **No Prescribed Period**— Correspondence, memoranda and email that do not pertain to documents having a prescribed retention period should generally be discarded sooner. These may be divided into two general categories:
  a. Those pertaining to routine matters and having no significant, lasting consequences should be discarded *within two years.* Some examples include:
     1. Routine letters and notes that require no acknowledgment or follow-up, such as notes of appreciation, congratulations, letters of transmittal, and plans for meetings.
     2. Form letters that require no follow-up.
     3. Letters of general inquiry and replies that complete a cycle of correspondence
     4. Other letters of inconsequential subject matter or that definitely close correspondence to which no further reference will be necessary.
  b. Those pertaining to non-routine matters or having significant lasting consequences should generally be retained permanently.
- **Email –** Not all email needs to be retained and depends on the subject matter.
  a. E-mail—from internal or external sources—may be deleted after 12 months.
  b. Employees will strive to keep all but an insignificant minority of their e-mail related to business issues.
  c. Any e-email employees deem vital to the performance of their job should be copied to the staff's H: drive folder, and printed and stored in the employee's workspace.

Destruction of Records – Expired Records must be destroyed in the following manner at the direction of the CCO.

- Hardcopy Records must be shredded in a manner that renders them unreadable and that would prevent them from being reconstructed. Security of the Expired Records must be maintained until proper destruction is actually performed.
- Electronic Records will be destroyed according to current and available technology in conjunction with the LADD IT Director. Methods may include disintegration, incineration, pulverization, melting or electronic sanitization. The method used will depend on the type of device as well as the nature of the information contained in the device. Such destruction methods require trained professionals and must be conducted by authorized personnel.

Technology Disaster Recovery Plan – This plan is part of the Annual Strategic planning process and outlines the action taken to secure, recover, store and dispose of all company electronic records. The plan works in conjunction with this policy and the Media and Device Control Policy to ensure appropriate record management.

Record Retention Schedule – The established record type and timeframe for maintenance, retention and disposal of LADD records. This schedule may be deviated from with Steering Committee approval

A. ACCOUNTING AND FINANCE

Record Type	Retention Period
Accounts Payable ledgers and schedules	7 years
Accounts Receivable ledgers and schedules	7 years
Annual Audit Reports and Financial Statements	Permanent
Annual Audit Records, including work papers and other documents that relate to the audit	7 years after completion of audit
Annual Plans and Budgets	2 years
Bank Statements, Deposit Records and Canceled Checks	7 years
Employee Expense Reports	7 years
General Ledgers	Permanent

Record Type	Retention Period
Interim Financial Statements	7 years
Notes Receivable ledgers and schedules	7 years
Investment Records	7 years after sale of investment
Credit card records (documents showing customer credit card number) *	2 years
All service billing related documents	Current plus 7 years
All person supported billing related documents	Current plus 7 years

*Credit card record retention and destruction

1. All records showing credit card number must be locked in a desk drawer or a file cabinet when not in immediate use by staff.
2. If it is determined necessary to retain information on a document containing credit card information beyond 2 years, then the credit card number will be cut out of the document.

B. CONTRACTS

Record Type	Retention Period
Contracts and Related Correspondence (including any proposal that resulted in the contract and all other supportive documentation)	7 years after expiration or termination

C. GRANT RECORDS

Record Type	Retention Period
Original grant proposal	7 years after completion of grant period
Grant agreement and subsequent modifications, if applicable	7 years after completion of grant period
All requested IRS/grantee correspondence including determination letters and "no change" in exempt status letters	7 years after completion of grant period
Final grantee reports, both financial and narrative	7 years after completion of grant period
All evidence of returned grant funds	7 years after completion of grant period
All pertinent formal correspondence including opinion letters of counsel	7 years after completion of grant period
Report assessment forms	7 years after completion of grant period
Documentation relating to grantee evidence of invoices and matching or challenge grants that would support grantee compliance with the grant agreement	7 years after completion of grant period
Pre-grant inquiry forms and other documentation for expenditure responsibility grants	7 years after completion of grant period
Grantee work product produced with the grant funds	7 years after completion of grant period

D. INSURANCE RECORDS

Record Type	Retention Period
Annual Loss Summaries	10 years
Audits and Adjustments	3 years after final adjustment

Record Type	Retention Period
Certificates Issued to LADD	Permanent
Claims Files (including correspondence, medical records, injury documentation, etc.)	Permanent
Group Insurance Plans – Active Employees	Until Plan is amended or terminated
Group Insurance Plans – Retirees	Permanent or until 6 years after death of last eligible participant
Inspections	3 years
Insurance Policies (including expired policies)	Permanent
Journal Entry Support Data	7 years
Loss Runs	10 years
Releases and Settlements	25 years

E. LEGAL FILES AND PAPERS

Record Type	Retention Period
Legal Memoranda and Opinions (including all subject matter files)	7 years after the close of the matter
Litigation Files	1 year after the expiration of appeals or time for filing appeals
Court Orders	Permanent
Requests for Departure from Records Retention Plan	10 years
Compliance Related Documents (including complaints, investigations and work papers)	7 years
Service Related Audit Documents	7 Years
ORR and Licensing Investigations and Reports	7 years

F. MISCELLANEOUS

Record Type	Retention Period
Consultant's Reports	2 years
Material of Historical Value (including pictures, publications)	Permanent
Newsletters	Current version plus 2 years.
Policy and Procedures Manuals – Original	Current version with revision history
Policy and Procedures Manuals Copies	Retain current version only
Annual Reports	Permanent
Strategic Plans	Current Year plus 5 years.
Requests for Proposals	Current Year plus 5 years.

G. PAYROLL DOCUMENTS

Record Type	Retention Period
Employee Deduction Authorizations	4 years after termination
Payroll Deductions	Termination + 7 years
W-2 and W-4 Forms	Termination + 7 years
Garnishments, Assignments, Attachments	Termination + 7 years
Labor Distribution Cost Records	7 years
Payroll Registers (gross and net)	7 years
Employee Deduction Authorizations	4 years after termination
Time Card Data	Current plus 5 years
Unclaimed Wage Records	6 years

H. PENSION DOCUMENTS AND SUPPORTING EMPLOYEE DATA

General Principle: Pension documents and supporting employee data shall be kept in such a manner that LADD can establish at all times whether or not any pension is payable to any person and if so the amount of such pension.

Record Type	Retention Period
Retirement and Pension Records	Permanent

I. PERSONNEL RECORDS

Record Type	Retention Period
Commissions/Bonuses/Incentives/Awards	7 years
EEO- I /EEO-2 - Employer Information Reports	2 years after superseded or filing (whichever is longer)
Employee Earnings Records	Separation + 7 years
Employee Handbooks	1 copy kept permanently
Employee Medical Records	Separation + 6 years
Employee Personnel Records (including individual attendance records, application forms, job or status change records, performance evaluations, termination papers, withholding information, garnishments, test results, training and qualification records)	7 years after separation
Employment Contracts – Individual	7 years after separation
Employment Records - Correspondence with Employment Agencies and Advertisements for Job Openings	3 years from date of hiring decision

Record Type	Retention Period
Employment Records - All Non-Hired Applicants and selection files (including all applications and resumes - whether solicited or unsolicited, results of post-offer, pre-employment physicals, results of background investigations, if any, related correspondence)	2-4 years (4 years if file contains any correspondence which might be construed as an offer)
Job Descriptions	3 years after superseded
Personnel Count Records	3 years
Forms I-9	3 years after hiring, or 1 year after separation if later
COBRA	Current plus 7 years
Workers Compensation files	Current plus 10 years
Medical Records non-exposure	Current plus 7 years
Medical Records exposure	Current plus 30 years

J. PROPERTY RECORDS

Record Type	Retention Period
Correspondence, Property Deeds, Assessments, Licenses, Rights of Way	Permanent
Original Purchase/Sale/Lease Agreement	Permanent
Property Insurance Policies	Permanent

K. TAX RECORDS

General Principle: LADD must keep books of account or records as are sufficient to establish amount of gross income, deductions, credits, or other matters required to be shown in any such return. These documents and records shall be kept for as long as the contents thereof may become material in the administration of federal, state, and local income, franchise, and property tax laws.

Record Type	Retention Period
Tax-Exemption Documents and Related Correspondence	Permanent
IRS Rulings	Permanent
Excise Tax Records	7 years
Payroll Tax Records	7 years
Tax Bills, Receipts, Statements	7 years
Tax Returns - Income, Franchise, Property	Permanent
Tax Workpaper Packages - Originals	7 years
Sales/Use Tax Records	7 years
Annual Information Returns - Federal and State	Permanent
IRS or other Government Audit Records	Permanent

L. CONTRIBUTION RECORDS

Record Type	Retention Period
Records of Contributions	Permanent
LADD's or other documents evidencing terms of gifts	Permanent

M. PROGRAM AND SERVICE RECORDS – see https://www.michigan.gov/documents/dtmb/RMS_GS20_640204_7.pdf

Record Type	Retention Period
All Records for Individuals- 20.0059	10 years
Identification Face Sheets, Diagnosis and Discharge Summary- 20.0058	20 years after discharge
Programmatic Records (HIPAA Log, Emergency Drills, –Employee Training Book, Maintenance Records, IRs)	Current year plus 2 years.
Fees	7 years
Medical Records	7 years
LADD convening reports (meetings)	Permanent (1 copy only)
Research & Publications	Permanent (1 copy only)
All Records for Individuals Who Lived in a Licensed Setting and Have Been Discharged	2 years of records prior to the date of discharge kept at the home

N. FISCAL SPONSOR PROJECT RECORDS

Record Type	Retention Period
Sponsorship agreements	Permanent

O. COMPANY RECORDS AND RESOURCES

Record Type	Retention Period
Board of Directors- past and current information	Permanent
By Laws	Permanent
Annual Financial Reports	Permanent
Equipment Inventory	Current plus 7 years
Administrative Subject Files (analysis and planning documents)	Current plus 6 years
Hazardous Materials Safety Data Sheets	Current plus 30 years
Planners and Calendars	Current plus 2 years
Audio-Visual Material	Current

PROCEDURE FOR STORAGE AND DISPOSAL OF PERSON OR COMPANY ASSETS

Seasonal Clothing

Seasonal clothing for each person should be stored at the program unless there is no area available. If no area is available the Area Supervisor will coordinate storage on an individual basis, considering the most efficient and practical option. Clothing items for storage will be placed into sealed totes (mothballs are optional and may discourage pests). Label the tote on the outside with Large Block Print. Label by

a. Program Name
b. Person's Initials

If a person's clothes are damaged, no longer fit or are clearly unwanted follow the process for documenting disposal as outlined on the Personal Belongings Inventory form located in individual Personal Allowance Books. This form states, "**2 staff must sign when any items purchased with personal funds are brought into the program or when any personal belongings leave program except for usual daily wear and disposable personal items."** and must be coded according to the form as follows;

Method of Removal

a. Destroyed by self = D/S
b. Destroyed by some other mechanism = D/M
c. Destroyed due to lack of fit = D/F

Furniture, Medical Equipment, Televisions, Appliances and Washers and Dryers

Any furniture, medical equipment, televisions, appliances or washers and dryers owned by the **people** must be listed on the Personal Belongings Inventory form located in individual Personal Allowance Books. If it is determined an item is no longer usable or wanted the following will occur:

a. With Management assistance, the person or guardian will provide documentation to be put in the person's Personal Allowance Book, which states the item and how they would like the item disposed of. If the item is to be sold, a price must be included as well.
b. Based on the noted disposal, the Supervisor will coordinate to have the item removed from the program and disposed of.
c. If the item is to be sold, the Supervisor will obtain documentation of fair market value by using an available resale website such as Craigslist or Let Go to verify the price for the item requested is reasonable. Documentation of the price must be kept in the person's Personal Allowance Book along with the documentation of the person or guardian disposal request.
d. If necessary, the Supervisor will assist in the sale of the item.

Any furniture, medical equipment, televisions, appliances or washers and dryers owned by **LADD** must be listed on the Equipment-Appliance List and/or the Major Equipment and Furnishings List located in the Maintenance Manual. If it is determined the item is no longer usable, the following will occur:

a. If the item is to be disposed of, the Supervisor will document the items removal from the Equipment-Appliance List and/or the Major Equipment and Furnishings List located in the Maintenance Manual.
b. The Supervisor will coordinate to have the item removed from the program and disposed of.
c. If the item is usable the Supervisor will coordinate with the Maintenance Department to put the item into long term storage as follows:
    1. The item will be taken to the Hillside pole barn, or if the item requires protected storage due to vulnerability to infestation or leaks, it is to be taken to the Hillside basement.
    2. The Area Supervisor must coordinate this storage and any special instructions for storage. Assistance with pick up/delivery and keys will be necessary to complete the process.
    3. The item will be tagged with the County and Program Name.
    4. The Maintenance Department will keep an inventory of items in long term storage
    5. If an item is needed, the Supervisor with coordinate with the Maintenance Department to obtain the item and the item will be removed from the inventory.
    6. If necessary, items from the Central Region can be stored in these locations as well. In this case, the Director will coordinate arrangements.

*****LADD IT Assets*****

All LADD IT assets are inventoried and disposed of in accordance with the Device and Media Control Policy.

PROCEDURE FOR PURGING AND STORAGE OF COMPANY AND STAKEHOLDER RECORDS

Personnel Records:

Personnel records are stored and organized as outlined in the Recruiting, Application and Hiring Policy. Employees hired prior to 2016 have a paper personnel record. Employees hired 2016 and forward have both a paper file and an electronic file in the Filehold system. Once an employee is termed, if they have a paper record, all portions of their files are banded together, kept in the HR Records Room and then transferred to storage containers by year of termination before being moved to longer term storage. If the employee had their record in Filehold, it will be retained per the record retention table. Regardless of hire date, all active Management personnel records are kept in paper form and locked in a separate and secure location. Personnel Records will be stored in long-term storage by the Human Resource Department according to year termed.

Company and People Supported Records:

All company and people supported records are purged according to the details outlined in the Purge Grid document associated with this Policy. Documents in three ring binders or in plastic sleeves must be removed from such. The designated storage location for all records is the Niles long term storage building.

a. The Quality Assurance Department will transfer company QA records into individual containers and label accordingly. Arrangements will be made to take the records to long term storage. People supported records will be secured according the Purge Grid and arrangements will be made to take the records to long term storage.