

SOUTH BAY REGIONAL HOUSING TRUST

RECORD RETENTION POLICY

Purpose of this Policy

This policy and procedures for records retention and management ("Policy") are intended to ensure that necessary records and documents of the South Bay Regional Housing Trust ("Trust" or "SBRHT"), including electronic records and documents, are adequately protected and maintained, and to ensure that records that the Trust no longer needs are discarded at the proper time. Effective records management ensures that records are kept only as long as they have some administrative, fiscal, or legal requirement or value. This Policy is further intended to facilitate the fulfillment of the Trust Executive Director's duty of care, establish transparency in records retention and destruction, and ensure compliance with applicable legal requirements for records and documents.

Effect of Information Technology Standards

SBRHT is a virtual organization with no physical office, property, or equipment. All work is conducted virtually by dispersed staff (including contractors and member city representatives, collectively the "Trust representatives") via online and cloud-based tools. It is anticipated that most records will be in digital formats, stored electronically in platforms provided and managed by the Trust, per Trust standards for information technology, including encryption, access control, and backup and recovery.

Policy and Procedures

- A. Applicability.** This Policy applies to all physical records generated in the course of the Trust's operation, including both original documents and reproductions. This Policy also applies to all electronic documents and records.
- B. Record Retention Schedule.** Attached as Exhibit A is a Record Retention Schedule that is approved as the initial maintenance, retention, and disposal schedule for physical records and electronic documents of the Trust. The Trust will maintain all records until the expiration of the retention period in accordance with this Policy and the Record Retention Schedule. Once the retention period has ended, the Trust may destroy, or cause to be destroyed, those records. Except as otherwise specified, retention periods shall begin from the date of creation of the record.
- C. Active Records.** Excepted from the disposal requirement are any Active Records, which are those records kept "close at hand" in either physical or electronic format that are still in use or referred to on a regular basis.
- D. Non-Records.** In the course of conducting business, some files and documents will inevitably be created that do not meet the standard of a record, such as those that contain no information of significant or lasting value, such as transmittal letters; acknowledgments; drafts, rough notes, or calculations created and used in the preparation or analysis of other documents; unofficial copies of other documents kept only for convenience or reference; and working papers. There is no retention requirement for these items, and they should be discarded when they have fulfilled the purpose for which they were created.

E. Correspondence and Internal Memoranda. Some correspondence and internal memoranda 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 (10 years after expiration). It is recommended that records that support a particular project be kept with the project and take on the retention time of that particular project file.

Correspondence or memoranda that do not pertain to documents having a prescribed retention period should generally be discarded sooner.

F. Electronic Mail. Not all email needs to be retained, depending on the subject matter. The Trust provides an email system to its representatives as a convenient and efficient medium of communication. Email is intended and designed to be a tool of communication but the email system is not a medium for storage of information or for any of the Trust's records. Trust staff must determine with regard to each email whether the Trust's Record Retention Schedule requires the retention of a particular record. If required, staff must retain the email in some form for the retention period identified on the attached Records Retention Schedule. If retention is not required, staff should delete the email as soon as it is no longer necessary for the discharge of official duties.

- Staff will strive to keep all but an insignificant minority of their e-mail related to business issues.
- Staff will not store or transfer Trust related e-mail on non-work-related computers except as necessary or appropriate for purposes.
- Staff will take care not to send confidential/proprietary Trust information to outside sources.

G. Documents Not in Record Retention Schedule. Any record that is not addressed in the Record Retention Schedule shall be maintained for at least two years after its creation or for such period of time as may be required pursuant to any applicable state or federal law or regulation, whichever is longer.

H. Personally Identifiable Information. In the course of enforcing loan and regulatory agreement terms and fulfilling grant reporting requirements or other programmatic needs, the Trust may receive Personally Identifiable Information ("PII"). PII is information that can be used to distinguish or trace an individual's identity either directly or in combination with other pieces of information, for example, names, addresses, identification numbers, phone numbers, date of birth, place of birth, race, employment information, medical information, and financial information. Although the Trust will limit the collection of PII whenever feasible, information that must be collected will be stored in a locked file cabinet when not in use. PII may also be stored digitally in a secured location with appropriate encryption and access controls for staff and contractors. PII information will only be stored as long as necessary.

I. Administration. The Trust Executive Director, or their designee (the "Administrator"), is the officer in charge of the administration of this Policy and the implementation of processes and procedures to ensure that the Record Retention Schedule is followed. The Administrator is also authorized to make modifications to the Record Retention Schedule from time to time to ensure that it

is in compliance with local, state, and federal laws and includes the appropriate document and record categories for the Trust; monitor local, state, and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this Policy.

J. Suspension of Record Disposal In Event of Litigation or Claims. In the event, the Trust is served with any subpoena or request for documents, or any Trust representative becomes aware of a governmental investigation or audit concerning the Trust or the commencement of any litigation or any potential litigation against or concerning the Trust, such representative shall inform the Administrator and any further disposal of documents related to the subject of such matter shall be suspended until such time as the Administrator, with the advice of legal counsel, determines otherwise. The Administrator shall take such steps as are necessary to promptly inform all staff of any suspension in the further disposal of documents. No document or record may be destroyed which may impede, obstruct, or influence any federal, state, or local government investigation.

K. Disposition of Records. When records no longer fulfill the value for which they were created, and their retention period set out in Exhibit A has elapsed, they will be disposed of unless they also have some historical or research significance. If that is the case, the records should be preserved. Disposition of documents will prioritize recycling as appropriate for the material and content and will ensure a secure destruction of any documents containing confidential, PII, or sensitive information.

L. Destruction of Copies. At any time, the Trust may destroy and dispose of any copy or duplicate of an original record so long as the original record is retained in accordance with this Policy.

M. Backup of Electronic Documents. On a regular schedule, a backup copy of all electronic files (including email) will be created. This backup copy is a safeguard for retrieving lost information. The backup copy is considered a safeguard for the Trust record retention system but is not considered an official repository of Trust records.

N. Storage of Records. As a virtual organization without a physical office, all records' preferred format and storage is digital on a centralized electronic online file storage platform provided and maintained by the Trust and managed by their appointed Trust Executive Director. Non-digital records containing PII or other valuable or sensitive information will be stored in a locked cabinet when not in active use by the Trust Executive Director or appointed staff. In the future, if non-digital records are not in active use but must be retained per the Retention Schedule, the Trust may acquire space for the long-term storage of records if they cannot be digitized.

EXHIBIT "A"
RECORD RETENTION SCHEDULE

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RECORDS RETENTION SCHEDULE FOR SOUTH BAY REGIONAL HOUSING TRUST

Destruction of any record must be authorized by the legislative body. (Gov. Code §§ 60200 - 60204.)

Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
ACCOUNTING AND FINANCE				
Accounting Records – General Ledger	General Ledger	CCP 337 Sec. of State Local Gov’t. Records Retention Guidelines	Until audited + 4 years Sec. of State Guidelines recommends permanent retention.	Permanent
Accounts Payable	Journals, statements, asset inventories, account postings with supporting documents, vouchers; investments, invoices and back-up documents, purchase orders, , petty cash, postage, check requests, warrant registers etc. Expense reimbursements to employees & officers; travel expense reimbursements or travel compensation	CCP 337 26 CFR 31.6001-1(e)(2); Sec. of State Local Gov’t Records Mgmt. Guidelines recommendation GC 60201(d)(12)	Until audited + 4 years 7 years after date of payment	7 years

Legal Authority Abbreviations

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CFR	Code of Federal Regulations	R&TC	Revenue & Taxation Code (California)	PRC	Public Resources Code (California)
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Accounts Receivable	Receipts for deposited checks, coins, currency; checks received, reports, investments, receipt books, receipts, cash register tapes, payments for fees, permits, etc.	CCP 337 26 CFR 31.6001-1(e)(2); Sec. of State Local Gov't Records Mgmt. Guidelines recommendation	Until audited + 4 years	7 years
Annual Financial Report	May include independent auditor analysis	GC 34090	Until audited + 7 years	Permanent
Audit Reports Annual Comprehensive Financial Report (ACFR)	Financial services; internal and/or external reports	GC 60201 CCP 337, 343 Sec. of State Local Gov't Records Mgmt. Guidelines	Permanent	Permanent
Audit Hearing or Review	Documentation created and or received in connection with an audit hearing or review	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	Permanent

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Bank Account Reconciliations	Bank statements, receipts, certificates of deposit, etc.	26 CFR 31.6001-1(e)(2)	7 years	7 years
Budget, Annual	Annual operating budget approved by legislative body	GC 34090 Sec. of State Local Gov't Records Mgmt. Guidelines	7 years	Permanent
Checks – District-issued	District checks paid – expense reimbursement to employees; payments to independent contractors; etc. Includes check copies; canceled or voided checks; electronic versions of checks District checks paid to vendors; other District payments. Includes check copies; canceled or voided checks; electronic versions of checks.	GC 60201(d)(12) CCP 337 Sec. of State Local Gov't. Records Mgmt. Guidelines; CCP 337; 26 CFR 31.6001-1(e)(2)	7 years Until audited + 4 years	7 years
Credit Cards, District-owned	Credit card bills or statements, and other records related to use of District-owned credit cards	26 CFR 31.6001-1(e)(2)	Until audited + 4 years	Until audited + 4 years

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Credit Cards, Customer Info	Documents showing customer credit card number	GC 34090	2 years	2 years
Fund Transfers	Internal; bank transfers & wires	CCP 337; 26 CFR 31.6001-1(e)(2)	Until audited + 4 years	7 years
Interim Financial Statements	Working Statements prior to audit	GC 34090	Until audited + 4 years	7 years
Investment Reports, Transactions	Summary of transactions, inventory and earnings report	GC 34090 CCP 337 Sec. of State Local Gov't Records Mgmt. Guidelines	Permanent	Permanent
Notes Receivables	Ledgers and Schedules	GC 34090 CCP 343	Until audited + 4 years	10 years
Returned Checks	Adjustments-NSF, etc. (not District checks)	GC 34090 CCP 337, 343	Until audited + 4 years	Until audited + 4 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
CONTRACTS AND AGREEMENTS				
Agreements (see also Contracts)	Original contracts and agreements and back-up materials, including license agreements, service/maintenance contracts, consultant agreements, etc.	CCP 337 CCP 337.2 CCP 343	4 years after termination/completion	10 years after completion
	Property management agreements Construction contracts Other contracts Correspondence related to contracts (including any proposal that resulted in the contract and all other supportive documentation)	CCP 337.15	10 years after termination/completion	10 years after completion
Lease Agreement	Property or equipment	CCP 337 CCP 337.2 CCP 343	Until terminated + 4 years	10 years after expiration

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Purchasing RFQ's, RFP's,,	Requests for Qualifications; Requests for Proposals regarding goods and services, Purchasing Responses, Successful	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Until audited + 4 years	Until audited + 5 years
Purchasing Responses, Unsuccessful	Unsuccessful RFPs, RFQs	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines; CCP 337	2 years	2 years
CORPORATE RECORDS				
Affidavits of Publication / Posting	Legal notices for public hearings, publication of ordinances, etc.	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	2 years
Agenda / Agenda Packets	Original agendas / special meeting notices / certificates of posting, etc. - Board of Directors meetings	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	5 years

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Agenda reports (staff reports)	Documentation received, created and/or submitted to Board of Directors	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	5 years
Articles of Incorporation	Including corporate seals	GC 34090 GC 60201	Permanent	Permanent
Bylaws		GC 34090 GC 60201	Current + 4 years	Permanent
Conflict of Interest Code	Conflict of Interest Code – required under Political Reform Act; must be reviewed by July 1st of every even-numbered year and amended if necessary	GC 87300 et seq.	Permanent	Permanent

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Ethics Training Records	Records required to be kept. Records must show dates that local officials and designated staff satisfied the training requirements and the entity that provided the training	GC 53235.2	5 years after receipt of training	5 years after receipt of training
Minutes – Board meetings	Minutes of District Board meetings. Documents may be imaged immediately. (Documents are to be retained in original format, whether hard copy or electronic)	GC 34090, 60201	Permanent	Permanent
Notices – Public Meetings	Special Meetings	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	2 years
Oaths of Office	Elected and public officials – Board Members	GC 34090 29 USC 1113 Sec. of State Local Gov't Records Mgmt. Guidelines	Length of term/employment plus 6 years	Length of term/employment + 6 years

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Recordings, video recordings – meetings of legislative bodies	Recordings of public meetings made by or at the direction of the District (e.g., Board meetings)	GC 54953.5(b)	Minimum 30 days	7 years
Resolutions	Vital records – may be imaged immediately	GC 60201 GC 34090	Permanent	Permanent
Strategic Plans	General strategy plans	GC 60201 GC 34090	Current + 4 years	Current + 5years
CORRESPONDENCE				
Complaints - Miscellaneous	Miscellaneous complaints, not related to specific lawsuits involving the District and not otherwise specifically covered by the retention schedule.	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	2 years

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Correspondence	General correspondence regarding District business, including but not limited to letters, email, and text messages; Posts/comments on District-owned social media accounts	GC 34090; Sec. of State Local Gov. Records Mgmt. Guidelines	2 years	2 years
GRANTS				
Grants - Successful	Grant documents and all supporting documents: applications, reports, contracts, project files, proposals, statements, sub-recipient dockets, environmental review, inventory, consolidated plan, etc.	GC 34090 24 CFR 570.502 24 CFR 85.42	Until completed + 5 years	Until completed + 7 years
Grants – Unsuccessful	Applications; Documents showing rejection or denial of application	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	2 years
INSURANCE				

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Bonds – Employee (Fidelity Bonds)	Form of insurance that covers employer (District) for losses resulting from fraudulent acts of specified employees	GC 34090	Current + 2 years	Current + 2 years
Bonds, Development	Housing; Industrial Development	CCP 337.5	Upon cancellation, redemption, or maturity + 10 years	Upon cancellation, redemption, or maturity + 10 years
Bonds, Surety	Documentation created and/or received in connection with the performance of work/services for the District	CCP 337	4 years	4 years
Claims Filed Against the District	Government Claims Act – Claims paid/denied (Documents are to be retained in original format, whether hard copy or electronic)	GC 60201(d)(4); GC 34090	Until settled + 2 years	Until settled + 7 years
Inspections		GC 60201	2 years	3 years

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Insurance Certificates	Liability, performance bonds, employee bonds, property: Insurance certificates filed separately from contracts, includes insurance filed by licensees.	GC 34090 Sec. of State Guidelines	Current + 2 years	Permanent
Insurance Policies	Policy Documents	GC 34090 GC 60201	Current + 2 years	Permanent
Insurance, Risk Management Reports	Federal OSHA Forms; Loss Analysis Report; Loss Runs; Safety Reports; Actuarial Studies	29 CFR 1904.44 GC 34090	5 years (Federal) 2 years (State)	10 years
Settlement Agreements	Final, signed/approved settlement agreements for litigation matters, claims, etc. For Workers Compensation claims – final, signed/approved settlement agreements	GC 60201(d)(4) 8 CCR 10102 8 CCR 15400.2	2 years after signed/approved 5 years after signed/approved	25 years

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Unemployment Insurance Records	Records relating to unemployment insurance – claims, payments, correspondence, etc.	26 USC 3301-3311; Calif. Unemployment Insurance Code; CCP 343	While current + 4 years	While current + 4 years
LEGAL AND LEGISLATIVE				
Court Orders	Court issued directives and orders	GC 34090 GC 60201	Permanent	Permanent
Legal Opinions	Confidential – not for public disclosure (attorney-client privilege)	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Until superseded + 2 years	7 years
Litigation	Case files (Documents are to be retained in original format, whether hard copy or electronic)	GC 60201(d)(4)	Until settled or adjudicated + 2 years	Until settled or adjudicated + 2 years
Public Records Request	Requests from the public to inspect or copy public documents	GC 34090 GC 60201(d)(5)	2 years	2 years

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Records Management Disposition/Destruction Certification	Documentation of final disposition/destruction of records	GC 34090, 60201(d)(10)	Permanent	Permanent
Records Retention Schedules		GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 4 years	Current + 4 years
MISCELLANEOUS				
Agency Report of Consultants (FPPC Form 805)	Identifies consultants hired by the District who must file Form 700	2 CCR 18734; GC 81009(e)	7 years	7 years
Agency Report – Events and Ticket/Pass Distribution (FPPC Form 802)	Report of tickets/passes; identifies persons who received tickets/passes and describes the public purpose for the distribution	GC 81009(e)	Originals - 7 years; Copy must be posted on agency website	Originals - 7 years; Copy must be posted on agency website

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Brochures/ Publications	Retain selected documents only for historic value.	GC 34090 Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years
Demographic/ Statistical Data		GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years
Gift to Agency Report (FPPC Form 801)	FPPC form showing payment or donation made to the District or to a District official and which can be accepted as being made to the District	2 CCR 18944(c)(3)(F), (G); FPPC Fact Sheet : “Gifts to an Agency – Part 2	Original - retain 7 years; Copy must be posted on agency website	Permanent
Gifts/Bequests	Receipts or other documentation	GC 34090	Until completed + 2 years	7 years
Materials of Historic Value	Photographs, publications, newspaper accounts, etc.	GC 34090	2 years	Permanent
Policies, Administrative	All policies and procedures, directives rendered by the District not assigned a resolution number	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years

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Policies, District Board	Original policies adopted by the District Board	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years
Press Releases	Related to District actions/activities.	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	2 years	2 years
Procedure Manuals	Administrative.	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years
Reports and Studies	Miscellaneous reports and studies, consultant reports	GC 34090 GC 60201	Current + 2 years	Current + 2 years
Statements of Economic Interest (SEI) - Form 700 (copies) (Board Members)	Copies of original statements of elected officials filed electronically with Fair Political Practices Commission. (Retain hard copy for 2 years, then retain imaged electronic version)	GC 81009(f), (g)	4 years	4 years

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Statements of Economic Interest Statements (SEI) - Form 700 (originals) - non-elected	Originals of statements of designated employees (Retain hard copy for 2 years, then retain imaged electronic version)	GC 81009(e), (g)	7 years	7 years
PAYROLL RECORDS				
ERISA Records (Employee Retirement Income Security Act)	Employee Retirement Income Security Act of 1974 - plan reports, certified information filed	29 USC 1027	6 years after date filed	6 years after date filed
Payroll - Federal/State Reports	Annual W-2's, W-4's, Form 1099s, etc.; quarterly and year-end reports	GC 60201	7 years	7 years
Payroll Deduction/Authorizations	Finance	29 CFR 516.6(c) GC 60201	While Current + 7 years	Termination + 7 years
Payroll records	Records that specify compensation paid to employees, officers (Documents are to be retained in original format, whether hard copy or electronic)	GC 60201(d)(12) 29 CFR 1627.3(a)	7 years after date of payment	10 years

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RECORDS RETENTION SCHEDULE FOR SOUTH BAY REGIONAL HOUSING TRUST

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Payroll records -employee information	Records showing employee information/data – names, addresses, etc.	29 CFR 516.5 LC 1174(d)	3 years from date of last entry	Current + 3 years from date of last entry
Payroll records, terminated employees	Finance files (Documents are to be retained in original format, whether hard copy or electronic)	29 CFR 516.5 GC 60201(d)(12)	7 years from date of last entry	10 years
Payroll, registers	Payroll registers, payroll reports (Documents are to be retained in original format, whether hard copy or electronic) Registers that show labor costs by employee and program	29 CFR 516.5(a) LC 1174(d) GC 60201(d)(12) Sec. of State Local Gov't Records Mgmt. Guidelines	7 years from date of last payment Sec. of State recommends permanent retention	10 years

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Payroll, time cards/sheets	Employee	29 C.F.R. 516.6; LC 1174; Sec. of State Local Gov't. Records Mgmt. Guidelines	3 years Sec. of State Guidelines recommendation - Until audited + 6 years	10 years
Payroll - Wage Rates / Job Classifications	Employee records	LC 1197.5(d) LC 1174(d) GC 12946 29 CFR 516.6 29 CFR 1602.4 29 CFR 1627.3	While current + 3 years	While current + 3 years
Wage Garnishment	Wage or salary garnishment	CCP 337	Active until garnishment is satisfied; then retain until audited + 4 years	
PERSONNEL				
Deferred Compensation Reports	Finance - pension/retirement funds	29 CFR 516.5 29 CFR 1627.3	3 years	3 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
EEOC Records (Equal Employment Opportunity Commission)	Records, reports showing compliance with federal equal employment requirements (EEO-4 Reports, etc.)	29 CFR 1602.30	3 years	3 years
Employee Benefits	Benefit plans (including “cafeteria” and other plans); health insurance programs; records regarding COBRA – extension of benefits for separated employees, insurance policies (health, vision, dental, deferred compensation, etc.)	29 USC 1027 28 CCR 1300.85.1 11 CCR 560 29 CFR 1627.3(b)(2)	For life of plan/policy + 6 years	For life of plan/policy + 6 years
Employee Information & Applicant Identification Records	Personnel--Data regarding race, sex, national origin of non-hired applicants & employees [Employee data must be kept separate from personnel files]	2 CCR 11013(b), (c)(2), (c)(3)	Current + 2 years	Current + 2 years
Employee Programs	Includes EAP and Recognition	GC 34090 GC 12946	Current + 2 years	Current + 2 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Employee, Recruitment	Alternate lists/logs, ethnicity disclosures, examination materials, examination answer sheets, job bulletins	GC 12946 GC 34090 29 CFR 1602.31 29 CFR 1627.3	Current + 3 years	Current + 3 years
Employee, Reports	Employee statistics, benefit activity, liability loss	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	Current + 2 years	Current + 2 years
Employment Applications - Not Hired	Applications submitted for existing or anticipated job openings, including any records pertaining to failure or refusal to hire applicant	GC 12946 29 CFR 1627.3(b)(1)(i)	2 years	2 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Employee, Medical & Exposure Records (toxic substances or harmful physical agents)	Medical records are part of personnel file --not a public record. Includes medical records made or maintained by a physician, nurse, or other health care personnel, or technician pertaining to employees exposed to toxic substances or harmful physical agents. Does <u>not</u> include first-aid records of one-time treatment made on-site by a non-physician or observation of minor scratches, cuts, burns, splinters, etc., which do not involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job. (For employees of less than 1 year, no need to retain medical records regarding exposure to toxic substances/harmful physical agents if they are returned to employee upon termination)	GC 6254(c) 29 CFR 1910.1020 8 CCR 3204 (d)(1)(A)(B)	Length of employment + 30 years	Length of employment + 30 years

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Employment Eligibility Verification (I-9 Forms)	Federal Immigration and Nationality Act	8 USC 1324a (b)(3)	3 years after date of hire, or 1 year after date of termination, whichever is later	3 years after date of hire, or 1 year after date of termination, whichever is later
Employment - Training Records,	Volunteer program training - class training materials, internships	GC 34090 GC 12946	Length of employment + 2 years	Length of employment + 2 years
Employment - Vehicle Mileage Reimbursement Rates	Annual mileage reimbursement rates	GC 60201(d)(10)	Until superseded	Until superseded
Family and Medical Leave Act	Records of leave taken, District policies relating to leave, notices, communications relating to taking leave	29 CFR 825.500 GC 12946	While employed +3 years (federal) or 2 years (State)	While employed +3 years (federal) or 2 years (State)
Job Descriptions	Descriptions of duties, qualifications, responsibilities for each position/classification/job title	29 CFR 1627.3	While current + 3 years	While current + 3 years

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Personnel Policies -- Rules and Regulations	Including employee handbooks, employee manuals, and other policies/procedures	29 CFR 516.6 29 CFR 1627.3(a)	Current + 3 years	Permanent
Recruitments and Selection	Records relating to hiring, promotion, selection for training	29 CFR 1627.3	3 years	3 years
Salary/Compensation Studies, Surveys	Studies or surveys of other agencies regarding wages, salaries and other compensation or benefits	GC 34090; Sec. of State Local Gov't Records Mgmt. Guidelines	While current + 2 years	While current + 2 years
State Controller	Annual reports.	GC 34090	2 years	2 years

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Workers Compensation Files	Work-injury claims (including denied claims); claim files, reports, etc.	8 CCR 10102	Until the latest of the following dates: 5 years from date of injury; or 1 year from date compensation was last provided; or when all compensation due has been paid.	Until the latest of the following dates: 5 years from date of injury; or 1 year from date compensation was last provided; or when all compensation due has been paid.
PROGRAM DOCUMENTS				
Annual Compliance Inspections		GC 34090 GC 60201	Current + 4 years	10 years
Annual project reports, financial statements, and audits		GC 34090 GC 60201	4 years after audit	10 years
Construction Projects	Working files and environmental reviews	GC 34090 GC 60201 CCP 337.1	Completion + 10 years	Completion + 10 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Notice of Funding Available		GC 34090	2 years	7 years
Project Funding Applications		GC 34090	Audit + 4 years	7 years
REAL PROPERTY				
Agreements	Development and Purchase & Sale Agreements	GC 34090 GC 60201 CCP 337.15	Expiration + 5 years	Expiration + 10 years
	Loan, financial, or promissory notes agreements	GC 34090 GC 60201	Satisfaction + 4 years after audit	10 years after payment in full
Appraisals	For real property owned by District – Exempt from public disclosure until real estate transaction is complete	GC 34090 GC 6254(h)	2 years	2 years
Deeds, Real Property (Grant Deeds)	File with recorded documents; originals may not be destroyed. (Documents are to be retained in original format, whether hard copy or electronic)	GC 34090 GC 60201(d)	Permanent	Permanent

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Deeds of Trust		24 C.F.R. § 92.508(c):	5 years after reconveyance	10 years after reconveyance or longer if required by applicable federal or state funding requirements.
Easements, Real Property	File with recorded documents; originals may not be destroyed. (Documents are to be retained in original format, whether hard copy or electronic)	GC 60201(d)(8)	Permanent	Permanent
Leases	Including Ground Leases	GC 34090	Current + 4 years	7 years after expiration
Regulatory Agreements		GC 34090 GC 60201	Current + 2 years	Permanent
TAX RECORDS				
Excise Tax Records		26 U.S.C. § 6001	7 years	7 years

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Type of Record	Description or Example of Record	Legal Authority	Minimum Legal Retention Period	Agency Adopted Retention
Federal Tax Records	May include as attachments copies of Forms 1095-C, 1096, 1099, W-4 and W-2	26 CFR 31.6001.1-4 26 CFR 31.6001-1(e)(2) 29 CFR 516.5-516.6	Current + 4 years	7 years
IRS Related	IRS Form 1023, IRS tax exempt determination, other tax-exemption documents and related correspondence; Other IRS rulings and determinations; IRS Form 990 filings; IRS audit records	26 U.S.C. § 6001	7 years	Permanent
Property Tax Records		GC 34090 GC 60201	4 years after audit	Permanent
State Tax Records	Forms filed annually; quarterly and year-end reports State tax exemption filings and documents	R&TC 19530 R&TC 19704	6 years	Permanent

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