

Chapter:	Governance & General Administration		
Title:	Document Retention & Destruction		
Policy: <input checked="" type="checkbox"/> Procedure: <input type="checkbox"/>	Review Cycle: Triennial Author: CEO/Finance Director	Adopted Date: 08.2020 Review Date: 05.2023	Related Policies: Confidentiality & Privacy Information Security

Purpose:

Hopeful Horizons (HH) is committed to efficient and effective document retention to preserve its history, ensure that critical records are available to meet business needs, comply with legal requirements, optimize the use of space, minimize the cost of record retention, and ensure that outdated and useless records are destroyed.

Scope:

This policy applies to

- | | |
|---|---|
| <input checked="" type="checkbox"/> All HH Staff | <input type="checkbox"/> Selected HH Staff, as specified: |
| <input checked="" type="checkbox"/> HH Board Members | <input type="checkbox"/> HH Volunteers |
| <input checked="" type="checkbox"/> Other: Sub-contract Providers | |

Policy:

It is the policy of HH to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of documents and to facilitate HHs' operations by promoting efficiency and freeing up valuable storage space.

This policy covers all records and documents, regardless of physical form, contains guidelines for how long certain documents should be kept and how records should be destroyed (unless under a legal hold). For purposes of this policy, client treatment records are considered active until treatment is officially terminated.

A. Document Retention Schedule

To achieve these document retention and destruction requirements, HH shall maintain a Document Retention Schedule (Attachment A), which includes the following:

- Document type
- Location/Secondary location or Back-up
- Retention Period
- Protection Level
- Disposal Instructions
- Disposal Authority

B. Electronic Document and Records (Excluding Electronic Client Files)

Excluding electronic client files, all other electronic documents will be retained as if they were paper documents. Therefore, electronic files, including records of donations made online, that fall into one of the document types on the record retention schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an “archive” computer file folder. HH shall verify that documents and records held by a third party are backed up and recovery methods are tested regularly.

C. Emergency Planning

HHs’ records will be stored in a safe, secure and accessible manner consistent with the HHs’ Confidentiality and Privacy policy. Documents and financial files that are essential to keeping HH operating in an emergency will be duplicated or backed-up at least every week and maintained off-site.

D. Document Destruction

HHs’ Finance Director, Human Resource (HR) staff and program directors are responsible for the ongoing process of identifying records which have met the required retention period and overseeing their destruction. All document destruction will be done in a manner ensuring confidentiality of protected information. Questions about document destruction should be referred to the department administrator with destruction authority as defined in the record retention schedule. A record shall be maintained of documents destroyed including method and date of disposal.

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

E. Compliance

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against Hopeful Horizons and its employees and possible disciplinary action against responsible individuals. The CEO/designee shall review the document retention schedule as needed changes are identified. The Board shall review the Document Retention and Destruction Policy consistent with HHs’ Policy Management Policy. At the time of policy review, the Board shall also review the Document Retention Schedule.

Communication and Training:

Board members and employees shall receive and review the policy at initial issuance and during the periodic policy review process.

Definitions:

1. Active Record: An original record/document currently used by the office, department or other area that generated it. Active records remain active for varying numbers of years, depending on the purpose for which they were created and regulatory requirements.
2. Archived Record: An original record/document that has permanent or historic value, is inactive, and is not required to be retained in the office in which it originated or was received.

3. **Electronic Record:** A record kept in a non-tangible electronic format. Electronic records include but are not limited to: word processor documents, spreadsheets, databases, HTML documents, scanned or imaged documents, and any other type of file warehoused online, on a mainframe, on a computer hard drive, or on any external storage medium (including disks and thumb drives). The same retention standards that apply to tangible records also apply to electronic records, and the retention periods outlined in the Document Retention Schedule apply equally to records in all formats.

4. **Tangible Records:** A record that is in hard copy paper format.

Other Related Materials:

Document Retention Schedule – Attachment A

References/Legal Authority:

1. [Document Retention Policies for Nonprofits, National Council of Nonprofits, 2023](#)
2. [How long should I keep records, Internal Revenue Service, 2023](#)
3. [Federal Record Retention Requirements, Society for Human Resource Management, 2018](#)
4. [How to create a simple Record Retention Schedule, Knowledgeone Corporation, 2018](#)
5. [HIPAA Data Retention Requirements, Compliancy Group, September, 2019.](#)
6. [OSHA Injury and Illness Recordkeeping and Reporting Requirements, United States Department of Labor, 2023](#)

Change Log:

Date of Change	Description of Change	Responsible Party
5.2023	Updated to the new policy template; added appropriate references, communication and training requirements	N. Miller, Prog. Eval. Consultant