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|  <p>Area Agency on Aging 1-B Advocacy • Action • Answers on Aging</p> | Procedure Title: Record Retention | |
| | Page 1 of 2 | Origination Date: 2/8/2013 Revision Date: N/A |
| Department: AAA 1-B Agency | | Procedure Owner: Quality Assurance |

A. Purpose

To ensure that records retained at the Area Agency on Aging 1-B (AAA 1-B) are appropriately identified, stored, protected, retrievable and disposed of upon expiration of retention time.

B. Scope

Entire AAA 1-B Agency

C. Definitions

| | |
|----------------------------|--|
| Records Administrator (RA) | The individual responsible for administering the off-site record retention functions. <i>The current records administrator is the HR & Payroll Specialist.</i> |
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D. Process

1. All records created and received are to be retained according to governmental, organizational and CARF requirements (as applicable).
2. Records are to be listed on the Record Retention Schedule for all departments.
 - a. All records listed must include the record name, department, record owner, the record type, retention period, location and disposition.
 - b. To request that a record be added to the retention schedule, an e-mail containing all of the information listed in 2a should be sent to the Quality Assurance Manager via e-mail.
3. Upon expiration of the onsite record retention time (if applicable), records are to be sent to the offsite record retention facility.
 - a. The department having records to send offsite, will box each category in order separately (i.e. closed client files, thinned client files, etc.) and complete the Offsite Record Retention Form in its entirety. One copy of the form is placed in the box with the records and the other is provided to the Records Administrator.
 - b. The RA conducts an audit of the contents of box to ensure they are in agreement with form provided by the employee.
 - c. Using the Corrigan Box Index (H:\Corrigan\Corrigan Box Index), the RA identifies the next available box number and barcode and writes the box number, along with description and destroy date on side of box. The barcode is affixed on the same side of the box as the description.
 - d. The offsite record retention form is updated with the barcode and box number and scanned/ saved electronically in the electronic Corrigan Storage Index and a hard copy is placed in Corrigan Index Binder.

- e. The RA will make all necessary arrangements for records to be picked up by Corrigan.
 - i. A Corrigan Inventory Record is completed and given to the representative from Corrigan, upon pick up of records.
 - f. All records sent offsite are indexed. A copy of the Records Index is retained in hardcopy in the office of the Records Administrator and electronically.
4. Upon expiration of records stored offsite, the RA will receive a notification from the offsite records facility that records are due for destruction.
 5. The RA will contact the appropriate manager/director for approval to destroy records.
 6. Once approval is obtained, the offsite records facility will be notified to proceed with record destruction.
 - a. If approval is not given, the manager/director must provide an acceptable business reason, to the RA, as to why records are not being destroyed according to the requirements on the record retention schedule.
 - b. The RA will discuss non-approval and the reason why approval was not given, with the CFO. Approval from the CFO is required, for retaining records beyond the retention period.

E. Associated Documents

Record Retention Schedule
 Corrigan Storage Index
 Corrigan Record Retention Form

F. Record Retention

| Record Name | Retention Period | Medium | Responsible Department |
|---------------------------|-------------------------|----------------------|-------------------------------|
| Corrigan Storage Index | Indefinite | Electronic/Hard Copy | Human Resources |
| Record Retention Schedule | Indefinite | Electronic | Quality Assurance |

Area Agency on Aging 1-B Record Retention Schedule

| Record Name | Department | Owner | Type | Retention Period | | | Disposition |
|---|-------------------|--|-------------------------|------------------|-----------------|------------------------------|-------------|
| | | | | Onsite | Offsite Storage | Total | |
| Research Data | Advocacy/Research | Director of Advocacy/Research | Electronic/Hard Copy | Permanent | Permanent | Permanent | N/A |
| Advocacy Reports | Advocacy/Research | Director of Advocacy/Research | Electronic/Hard Copy | Permanent | Permanent | Permanent | N/A |
| Business Associate Agreements | Operations | Quality Assurance Manager | Electronic; Hard Copy | 2 years | Indefinite | Indefinite | N/A |
| Chart of Accounts | Finance | Accounting Manager | Electronic; Hard Copy | 2 Years | Permanent | Permanent | N/A |
| Fiscal Policies and Procedures | Finance | CFO | Electronic; Hard Copy | N/A | N/A | Permanent | N/A |
| Financial statements | Finance | CFO | Electronic | N/A | N/A | Permanent | N/A |
| General Ledger | Finance | Accounting Manager | Electronic | 2 Years | Permanent | Permanent | N/A |
| Check registers/books | | | | | | 7 years | |
| Business expenses documents | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 7 years | Shredded |
| Bank deposit slips | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 7 years | Shredded |
| Cancelled checks | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 7 years | Shredded |
| Lockbox Checks | Finance | Accounting Manager | Electronic | 2 years | 7 years | 7 years | Shredded |
| Invoices | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 7 years | Shredded |
| Broker Statements; investment records (deposits, earnings, withdrawals) | Finance | CFO | Hard copy | 2 Years | Permanent | Permanent | N/A |
| Property/asset inventories | Finance | CFO/CPA Firm | Electronic | N/A | N/A | Permanent | N/A |
| Petty cash receipts/documents | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 3 years | Shredded |
| Credit card receipts | Finance | Accounting Manager | Hard copy | 2 Years | 7 years | 7 years | Shredded |
| Filing Fees Paid to Professional (IRS Form 1099) | Finance | Accounting Manager | Hard copy | 2 years | 7 years | 7 years | Shredded |
| Insurance disbursements / denials (Workers Comp, Disability, Unemploy.) | HR | Director of HR | Paper Copy | 3 years | Permanent | | |
| Investment Retirement Program | Finance | CFO/Investment Manager Tri-Star Trust Bank | Electronic | N/A | Permanent | Permanent | N/A |
| Exit Interviews | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| Performance Reviews | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| Training Records | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| Hiring Test Records | HR | Director of HR | Paper Copy (Hired Only) | 3 years | Permanent | Permanent | N/A |
| Board of Directors Records (Incl. Agendas & Minutes) | HR | Director of HR | Electronic (All Tested) | Permanent | Permanent | Permanent | N/A |
| Confirmation of employment letters | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| Benefits descriptions per employee (i.e. benefit enrollment forms) | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| Pension records & 401k | HR | Director of HR | Paper Copy | 3 years | Permanent | Permanent | N/A |
| | | | Electronic & Paper | Permanent | N/A | HR & Trustee/Payor's Records | N/A |

Area Agency on Aging 1-B Record Retention Schedule

| Record Name | Department | Owner | Type | Retention Period | | | Disposition |
|---|------------|---|-----------------------|---|---------------------------------------|--|-------------|
| | | | | Onsite | Offsite Storage | Total | |
| Employee applications and resumes | HR | Director of HR | | | | | |
| 1. If hired | HR | Director of HR | Paper Copy | 3 years | Permanent | | N/A |
| 2. Apps for those not hired | HR | Director of HR | Paper Copy | 1 year | | | N/A |
| | HR | Director of HR | Electronic | Permanent | | | N/A |
| 3. Unsolicited Applications | HR | Director of HR | Paper Copy | 1 year | | | N/A |
| Promotions, demotions, letter of reprimand, termination | HR | Director of HR | Paper Copy | 3 years | Permanent | | N/A |
| Job descriptions, performance goals | HR | Director of HR | Paper Copy | 3 years | Permanent | | N/A |
| Workers' Compensation records | HR | Director of HR | Paper Copy | 3 years | Permanent | | N/A |
| Salary ranges per job description | HR | Director of HR | Electronic & Paper | | | | N/A |
| I-9 Forms | HR | Director of HR | Paper Copy | 3 years | Permanent | | N/A |
| Time reports | HR | Payroll & HR Specialist | Electronic | Permanent | | | N/A |
| | | | | Current 3 year cycle or previous year if in 1st year | | Indefinite; minimally 6 years | |
| Contract Files | ND | Contract Managers | Hard Copy | | Indefinite | | N/A |
| | | | | | | Filing cabinets in hallway across from billers | |
| DSP Vendor Files | ND | Program Manager, DSP | Hard Copy | | Inactive vendors greater than 2 years | | N/A |
| | | | | All active vendors; Inactive vendors for at least 2 years | | Filing cabinets in hallway across from billers | |
| DSP 3 Year Bid Applications | ND | Program Manager, DSP | Electronic; Hard Copy | Current 3 year cycle | Previous 3 year cycle | Indefinite; minimally 6 years | N/A |
| Provider Assessments | ND | Contract & Vendor Mgrs Specialist, Training & LGBT Issues | Electronic | Indefinite | Indefinite | Indefinite; minimally 6 years | N/A |
| Professional training records | ND | | Hard Copy | Indefinite | N/A | | N/A |
| NSIP Agreements | ND | Program Manager, Nutrition Services | Electronic; Hard Copy | Current 3 yr cycle or previous year if in 1st yr | Indefinite | Indefinite; minimally 6 years | N/A |
| Creating Confident Caregiver records | ND | Team Leader, Contracts & Respite Services | Hard Copy; Electronic | Indefinite | | Minimally 6 years | N/A |
| TCARE Records | ND | Team Leader, Contracts & Respite Services | Hard Copy; Electronic | Indefinite | | Minimally 6 years | N/A |
| Evidence Based Program training records | ND | Program Manager/Evidence Based Specialist | Hard Copy; Electronic | Indefinite | N/A | | N/A |
| | | | | | | Kristin's office; MDCH/OSA | |
| OSA Assessments | ND | ND Director | Electronic; Hard Copy | 3 years | 3 years | Indefinite; minimally 6 years | N/A |
| AIP/MYP Documents | ND | ND Director | Electronic; Hard Copy | 6 years | n/a | 6 years | N/A |
| | | | | | | G Drive - AIP; ND Director's office | |



Area Agency on Aging 1-B Record Retention Schedule

| Record Name | Department | Owner | Type | Retention Period | | | Location | Disposition |
|---------------------------|------------|---|--------------------------|------------------------|-----------------|-------------------------------|---|-------------|
| | | | | Onsite | Offsite Storage | Total | | |
| OHR assessments/paperwork | ND | Respite and Residential Services Specialist | Electronic and Hard Copy | 5 years active clients | 7 years | Indefinite; minimally 6 years | Harmony; Respite and Residential Services Home office | N/A |