



# IRONTON METROPOLITAN HOUSING AUTHORITY

720 Washington St., Ironton, OH 45638    Ph: 740-532-8658    Fax: 740-532-6990

## **RECORDS RETENTION POLICY**

### **PURPOSE**

It is the policy of the Ironton Metropolitan Housing Authority (IMHA) to accommodate the timely storage, retrieval, and disposition of records created, utilized, and maintained by the Housing Authority and to articulate and implement an appropriate records retention policy that meets the following criteria:

1. All records are retained for the period required by applicable state and federal laws and regulations.
2. Adequate records will be developed and maintained to document IMHA's compliance with all relevant laws and regulations.
3. All records necessary for business reasons are retained for a period of time that will reasonably assure the availability of those records when needed.
4. Vital records will be identified and appropriately safeguarded.
5. All records not necessary for legal and business reasons can be destroyed in order to reduce the high cost of storing, indexing and handling the vast amount of documents and paper which would otherwise accumulate
6. Destruction of records shall take place on in compliance with a standard policy that has been developed for business reasons in order to avoid the inference that any document was destroyed in anticipation of a specific problem.
7. Documents that are not subject to retention may need to be retained due to otherwise unusual circumstances, such as litigation or government investigation. If for any reason it is felt that a document should be retained due to an unforeseen circumstance, IMHA's legal counsel should be consulted. When litigation or investigations occur, outside or in-house counsel will notify the appropriate staff and direct that relevant categories of documents be labeled for retention until further notice.
8. The privacy and security of records shall be appropriately assured.
9. Records maintained on electronic, magnetic, or digital media are legally acceptable media for records retention and are governed by the same guidelines as other records.



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10. It is imperative that IMHA know which documents have been retained and which documents have been discarded. Therefore, extra files including correspondence, notes, memoranda, computer drives, etc. which are maintained in individual offices, at home or any other off-site location are subject to this Policy and shall not be retained in excess of these guidelines.

## **RECORD POLICY GUIDELINES**

### **Role of Management Personnel**

Management personnel are designated as “record owners” and, as such, are responsible for public records generated by their development and/or under their purview. It is the responsibility of Management to ensure that their departmental records are forwarded to inactive records storage before the expiration of the retention periods.

### **Record Retention Schedule**

The Record Retention Schedule is provided to indicate how long agency records should be retained. The Record Retention Schedule is compiled from information received by management personnel, HUD guidelines, and state and federal laws.

### **Audit & Review**

The Executive Director, or other person the Director may designate, shall be responsible for auditing the existence and content of the Policy and the Retention Schedule. The Policy and Retention Schedule will be reviewed annually and any suggested changes or changes required by law will be made at that time.

### **Types of Documents Maintained in Inactive Records Storage**

- Personal, active or any records not included on the IMHA Record Retention Schedule and not to be sent to IMHA’s inactive record storage facility
- Inactive and permanent records are received and stored in inactive records storage until final disposition according to State and Federal retention guidelines.



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## **Electronic Data Policy**

- Electronic data includes information such as e-mail messages, chat room transcripts, databases, spreadsheets, web browser history files, and information from system backup tapes. Sources of electronic data include things such as home person computers, desktop computers, PDAs, zip drives, hard drives, etc. All of this information can be subject to discovery in litigation and should be controlled.
- Employees must preserve information they know is relevant to pending or potential litigation; this duty is the same for electronic data as it is for paper-based information.

## **OHIO PUBLIC RECORDS LAW**

### **Requirements**

- Adherence to guidelines set forth in Ohio Sunshine Laws Update (“Yellow Book”) regarding the Public Records Act and the Open Meetings Act. ([www.ag.state.oh.us](http://www.ag.state.oh.us))
- Adherence to guidelines set forth in 2007 Ohio HB 9, Sec. 149.43 regarding public records requests.
- **See IMHA’s Public Records Policy**