

# Policy: Records Retention and Destruction

ChildNet Number: CN 012.011

Original Approved Date: June 5, 2003

Policy Revised Date(s): May 30, 2010, June 22, 2010

Policy Sunset Date:

COA Standards: RPM 6.02, AS 13.05,

Statement of Policy:

Records are maintained and disposed of in a manner that protects privacy and confidentiality, and the organization.

Board Chair's Signature: Date: 10 19/10



# Procedure: Records Retention and Destruction

ChildNet Number: CN 012.011

Original Approved Date: June 5, 2003

Procedure Revised Date(s): May 30, 2010, June 22, 2010, June 10, 2014,

February 21, 2018, February 04, 2024, March 7, 2024

Procedure Sunset Date:

COA Standards: RPM 6.02, AS 13.05

### Definitions:

## Master Agreement:

**Records:** All documents, papers, letters, books, maps, tapes, photographs, forms, sound recordings, or other material (excluding blank forms) regardless of physical form or characteristics, made or received pursuant to law or ordinance or in connection with the transaction of business by ChildNet.

**Retention:** The minimum amount of time a record series must be maintained by ChildNet. Retention periods are based on a record's informational content, not its format.

**Records retention schedule:** A schedule that establishes the length of time records must be retained. It is a concise description of the documents that are included in the record series, and indicates how long to retain both the record copy and duplicate copies.

#### Statement of Procedure:

- ChildNet's Management Information System Department maintains the records retention schedule.
- The length of time and classification of records indicated in ChildNet's records retention schedule is based on the DCF records retention schedules found in the Department of Children and Families operating procedure, CFP and CFOP-15-04, records management where applicable for private entities.
- Some records (e.g., adoption case files and annual reports) may need to be kept longer based on legal or contractual guidelines. These records are listed in ChildNet's records retention schedule.
- 4. The Master Agreement (the Contract) between ChildNet and DCF requires ChildNet to retain all records that pertain to the Contract for six years after completion of the contract. If an audit has been initiated and audit findings have not been resolved at the end of six years, the records shall be retained until resolution of any audit findings or litigation based on terms of this contract.



- Records directly related to the Contract/Vendor Agreement between ChildNet and Sunshine Health/Centene requires ChildNet to retain records specifically pertaining to that contract and related delegated services for ten years.
- 6. Records that do not pertain to the Contract but that have a standard retention period required by federal or other applicable regulations (e.g., applications for employment, payroll records, and tax and withholding records) only need to be retained for the length of time established by those regulations. These records are listed in ChildNet's records retention schedule.
- 7. Records that do not pertain to the Contract, federal regulations, or any other applicable laws (e.g., visitor logs and mailing lists) only need to be kept for a length of time as determined by ChildNet. These records are listed in ChildNet's records retention schedule.
- ChildNet maintains two secure off-site storage facilities for its records. The storage
  and retrieval process for the Independent Living, Adoption, Contracts, and Fiscal files
  shall be maintained and disseminated by the Administrative Assistant to the Program
  Officers.

Electronic access is password protected and has the same user restrictions that the hard copies to prevent unauthorized access. If these records need to be accessed physically, employees must contact the Chief Financial Officer (CFO) or the designee.

#### **Destruction of Records**

ChildNet retains the service of a record destruction company that provides locked storage containers and regular schedule pickups and destruction of confidential materials onsite. Any records to be destroyed are placed in the locked storage containers to ensure that no confidential information is released. The records destruction company must provide verification to the CFO of all records destroyed. This documentation will be maintained by the Administrative Assistant to the CFO.

Destruction of records that are in electronic format will be completed in a fashion most practical and affordable considering the storage medium.

President's Signature:

Date: 05-08-25