

**SHELBY METROPOLITAN HOUSING AUTHORITY**  
**RETENTION AND SECURITY RECORDS**

**RETENTION AND SECURITY OF RECORDS**

All program files related to current applicants, tenants and program participants are retained in secure areas or are located in a filing system that can be locked during non-business hours. The general public is not permitted access to this information or to the secure areas where this information is maintained. The SMHA office keeps the doors to the filing area closed during business hours and locks the doors at the end of business hours. During business hours, the general public is only given admittance to the staff area of the building by a SMHA staff member. The SMHA office is secured by three locked entrances and an alarm system engaged each evening at the close of business.

During business hours, files and paperwork are kept in individual offices as they are being processed or reviewed. Housing Choice Voucher files are otherwise maintained in a closed file room adjacent to the receptionist office. Public Housing active files are in lockable filing cabinets in the office of the Program Administrator.

Inactive tenant files from the Housing Choice Voucher program are stored in a separate section. Public Housing and Management Program inactive files are stored in a locked filing room adjacent to the SMHA main office grounds.

Records related to tenants are stored and maintained for a minimum of three years following program participation as required by program regulation and agency policy. If the tenant leaves the program owing a debt to the agency, the files are maintained until three years pass but information pertaining to the debt is retained until the debt is resolved. All debts owed by vacated program participants are entered into the Debts Owed System.

Financial Records of the agency are maintained in locked file rooms in the building adjoining the Shelby Metropolitan Housing Authority office. Files are moved to this location following audit and are retained for a minimum of ten years.

Personnel records are maintained in the offices of the Executive Director and Finance Director. These records are retained permanently.

**SECURITY AND CONFIDENTIALITY OF PERSONAL INFORMATION**

All SMHA personnel are informed as to the sanctity and confidentiality of the personal information of the clientele assisted by the agency. At all times, employees are charged with maintaining the confidential nature of the data and information involved in the housing, computation of rent and continuing assistance of those served by the agency.

Whenever possible, this information shall remain on the desk of the person working on the file, or enclosed in the file and placed in the appropriate filing receptacle. SMHA personnel are prohibited from removing personal information of any client of the agency from the locked and secure area of the agency.

No employee may copy or remove any record or writing, even those regarded as "public record", without first obtaining advanced written permission from the Executive Director or without going through the process for obtaining public records (see Public Records Policy).

Each employee of SMHA shall treat all documents, publications, and written communications of SMHA as confidential, even if regarded as "public record" for the purposes of Revised Coed 149.43, unless obtained in accordance with the procedure for obtaining public records (see Public Records Policy)

No employee may copy, or use any agency writing, document, or record in any grievance, appeal, or legal action without first obtaining the permission of the Executive Director. This particular policy does not apply to matters obtained through formal "discovery" under the Rules of Civil Procedure.

Employees other than the Executive Director are prohibited from discussing any client, document, or Housing Authority matter with any person or entity outside of the employ of the Housing Authority except in those cases where the employee engages in discussion with another service oriented agency where sharing such information is a business necessity, or his/her own attorney concerning an action in which that employee has been named. Prior written permission must be available prior to engaging in these conversations.

The employee assigned to obtain personal information involved in the calculation of rent for those persons who reside at Hilltop Manor, Hewitt Villa, Mount Vernon, Jackson Towers, Shelby Manor and the person assigned to obtain the signature on the leases of these same properties, may be required to hand-carry or transport forms and paperwork that include the personal information of those individuals. In the course of doing so, all available precautions will be taken to guarantee that this material remains secure and in the possession of the SMHA staff person at all times. At no time will this information be left unattended by staff personnel. When traveling, this material should be transferred via the trunk of the vehicle whenever possible.

Computer back up of information occurs daily to an off-site, secure location.

#### AVAILABILITY OF RECORDS AND PROCEDURES FOR OBTAINING

The Shelby Metropolitan Housing Authority will prepare and make available upon request for inspection any "public records" as defined in the Public Records Policy which is a part of this document. The fee for reproduction of any requested copies are .25 (twenty-five cents) per page.

Anyone seeking to inspect or identify any public record for copying will not be required to do so in writing and does not have to provide his or her identity or the intended use of the requested public record. However, to assist with determination and clarity of the specific record requested, the Requester is asked to so make the request in writing whenever possible.

The Public Records Policy should be further reviewed for complete guidance.

### **Financial Records Retention and Disposal Schedule**

#### **Description of Records Retention/Disposal**

Bank Statement, Reconciliations & Cancelled Checks

#### **Recommended Minimum**

Dispose when 10 years old

Budgets: Operating with supporting schedules for each fiscal year of operation; revisions, other

Dispose when 10 years old

budget data and related records	
Cash disbursement and cash receipts register	Dispose when 10 years old
Cash receipts (rent, security deposits, other income, etc)	Dispose 10 years following accepted audit*
Temporary Notes, including related documents and correspondence	Dispose 7 years following audit* and payment of note
General Depository Agreement	Disposal not recommended
General Ledger in a Binder	Disposal not recommended
Depreciation Schedule	Disposal not recommended
Income Ledger	Dispose 10 years following accepted audit*
Initial Operating Ledger	Disposal not recommended
Property Insurance and Fidelity Bonds	Disposal not recommended
Property Insurance Register	Dispose 10 years following accepted audit*
Inventory of Expendable Equipment, Materials and Supplies, or nonexpendable Equipment	Dispose 10 years following accepted audit*
Nonexpendable Equipment Record Cards	Dispose 5 years after item is disposed of
Audit Reports and REAC Submissions	Disposal not recommended
Petty Cash Vouchers	Dispose 10 years following accepted audit*
Real Property Disposition Records	Disposal not recommended
Rent Roll – Accounts Receivable Ledgers	Dispose 10 years following accepted audit*
Request for Refund of Security/Pet Deposit	Dispose 10 years following accepted audit*
Revolving Fund – including General Ledger, Cash Receipts Register, Cash Disbursements Register	Dispose 15 years following accepted audit*
Schedules of Auditor’s Adjustments	Disposal not recommended

Tenants Accounts Receivable and Security Deposit Ledger Sheets	Dispose 10 years after audit* for accounts with zero balances. For claims with a balance, keep supporting documents until conclusion or resolution of debt.
1099's	Disposal not recommended
Chart of Accounts	Dispose 10 years following accepted audit*
Checks Deposited by Remote Capture	Checks will be held until the Audit for that year is complete and the AOS has issued opinion on the audit. The checks or money orders will then be shredded.
<b><u>Personnel Records</u></b>	
Employee Records of local PHA employees	Disposal not recommended
Individual Earnings Records of PHA employees (per the year end history)	Disposal not recommended
Leave Records of PHA employees	Disposal not recommended
Payrolls	Disposal not recommended
Federal, State, City and School Taxes	Disposal not recommended
OPERS Records of Contributions	Disposal not recommended
Group health Insurance Plans	Dispose 3 years after termination or amended

\*An accepted audit is when a successful resolution is reached of any open findings.