

OCO, Inc.
Retention and Destruction of Inactive Documents

Policy: OCO will adhere to all State and Federal guidelines concerning the confidentiality of inactive documents generated by this agency. OCO will retain all inactive documents in a secure setting, provide secure access for the duration that the documents are required to be retained by law and have the documents destroyed when appropriate. The Document Retention Schedule is at the conclusion of this policy.

Section I - Document Storage

A. Types of Documents Storage

There are two levels of storing inactive consumer, program and agency documents.

1. Division Level Document Storage
Divisions may select to store any or all of its inactive documents at their division program sites. In this event, divisions are responsible for adhering to the minimum standards for document storage.
2. Agency Level Document Storage
The agency will maintain designated areas for storage of multiple program and agency inactive documents. Documents contained within these areas must adhere to the minimum standards for document storage and several additional standards.

B. Responsible Parties for Document Storage and Retention

1. All Divisions will appoint a “document designee” who is responsible for assuring inactive documents are retained properly according to OCO Retention and Destruction of Inactive Documents Policy and Procedures. A master copy of the designated responsible individuals names will be kept on file with the Facilities Manager.
2. The OCO Facilities Manager is responsible for overseeing the proper storage of inactive documents retained in the OCO designated Document Storage areas.

The Facilities Manager will retain a file identifying the locations of all secure document storage sites. A copy of the locations will be provided to the Executive Director, the Deputy Executive Director, Director of Finance and Division Directors.

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C. Minimum Standards for Document Storage

The following minimum standards must be applied to all stored documents:

1. Ideally, OCO will have site ownership of storage locations to insure proper guardianship of the area. The Facilities Manager can approve storage at leased sites.
2. All OCO documents will be stored in archive quality boxes or quality storage units such as lockable file cabinets.
3. All archive boxes or document storage units must be labeled with:
 - i. Number for identification purposes;
 - ii. Contents
 - iii. Program Name
 - iv. Program Site Location
 - v. Destroy Date
 1. Destroy dates are determined by the most recent date of document in the storage container as the start date with the projected destroy date identified according to the Retention Document Schedule in "Attachment A".
4. The Division Documents Designee must maintain a file of all stored documents. The purpose of maintaining a file of stored information is to:
 - i. Facilitate retrieval of documents, as needed, after several years in storage;
 - ii. Easily identify what has been stored and its location;
 - iii. Identify and track dates of storage and destroy dates. Information in C. 3, i-v will be identified in the file.
5. All documents will be stored in secure, dry, cool locations.
6. Archive Boxes will not be stored directly on floors, under plumbing/ pipes or near furnaces or hot water tanks.
7. Archive boxes will be arranged on shelving units so the outside copy of the form is clearly visible to the aisles.
8. The secure location will be accessible only to authorized staff.
9. The Documents Designee will conduct a biannual review of documents stored and assure that documents are destroyed as noted by the destroy date.

Section II - Levels of Document Storage, Access and Inspection

D. Division/Program Sites Level Document Storage

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Documents stored at specific division/program sites must adhere to the minimum standards for documents storage as identified above in Section C of this procedure.

Divisions that maintain document storage at program specific sites must provide the OCO Facilities Manager with a copy of the required File Storage list (see section C-4) identifying locations, contents and destroy dates of documents.

Programs storing documents at programs sites will be responsible for destruction of documents in accordance with the OCO minimum standards for documents destruction.

The Division's document storage file must be updated noting date of document destruction and by whom.

E. Agency Level Document Storage

OCO, Inc. maintains storage areas that contain a variety of program, consumer and administrative documents housed in one location. In order to assure that these documents are organized, easily accessible, accounted for and destroyed properly, the following procedures will be adhered to:

1. Documents stored in Agency Level document storage areas will be stored in archive boxes with special adhesive labels obtained from the Internal Auditor.
2. Only archive boxes that are full can be stored in Agency Level storage areas.
3. Prior to storing documents in the Agency storage area, the Documents Designee for the division will assure that the:
 - i. Special adhesive label(s) are completed accurately;
 - ii. Information pertaining to the stored documents is recorded in the file retention document that includes box contents, box number, storage location and destroy date.
 - iii. Adhere special adhesive label to the outside of the box and on the inside lid of the box.
4. The Documents Designee will contact the Facilities Manager to identify which OCO document storage location will be used to store the documents.
5. Storage of documents in the area is organized by division and year. Staff storing new documents in the area must adhere to this storage format and locate an appropriate area for their documents.

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F. Access to Document Storage Areas

1. Staff may obtain a key to Agency storage areas from the following authorized personnel:
 - i. The Assistant to the Executive Director at 239 Oneida street in Fulton; or
 - ii. Building Assistant at Midtown Plaza Offices in Oswego.

These individuals are in charge of one checkout key and will assure compliance to the key check out/check in process.

2. Staff can obtain authorized access by signing out the key on the clipboard provided by the Assistant to the Executive Director or the Midtown Offices Building Assistant. The clipboard will document who accessed the key by name and title, program, reason for access, date/time of removal and date/time of return of the key.
2. Other authorized key holders include:
 - i. Facilities Manager
 - ii. Executive Director or designee
 - iii. Director of Finance
 - iv. Deputy Executive Director or designee
4. **EMERGENCY ACCESS TO SECURE SITE LOCATION:** Each Agency Level storage site will have an access key furnished. This key will be enclosed in a sealed envelope with the Facilities Manager's signature across the sealed flap. The key, in the envelope, will be located in a secure spot at the selected facility and will be accessible to the on site staff at the location. In case of an emergency situation, on site staff will be authorized to tear open the envelope to obtain the key to access the secure document site. Post emergency debriefing will be initiated by the staff with the Facilities Manager. Afterwards the key will be returned to a signed, sealed envelope.
5. Any staff entering a secure document storage location is responsible for the documents security and confidentiality.
6. Removal of any secure documents from the secure storage location can occur only by the authorized staff signing out the document on the clipboard provided at each site. The clipboard will document who removed the document by name and title, program, reason for removal

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of the document, date/time of removal and date/time of return of document.

- a. Any staff removing a document from a secure storage location retains full responsibility for the document. Failure to properly return documents may result in disciplinary action if warranted.

G. Inspection of Document Storage Areas

1. On a regular basis, the Facilities Manager will conduct an on site inspection of each secure site location to evaluate the security and environmental quality of the location for continued document storage.
2. Any emerging or demonstrated environmental concerns will be reported immediately to the Executive Director. Corrective action may occur prior to this report if deemed necessary to preserve the integrity of the retained documents.
3. An annual report of these regular inspections and evaluation will be provided to the Executive Director, Deputy Executive Director and the Division Directors.

Section III - Destruction of Documents

H. Destruction of Inactive Documents

1. The designated Division Documents person will annually review the Division Document Storage Database and complete a work order for the destruction of archive boxes that have reached the designated destruction date and that are stored in Agency storage areas.

The work order will be sent to the Facilities Manager who will arrange for the transportation and destruction of identified archive boxes.

All documents will be destroyed in an appropriate manner. Two approved methods are:

- i. Be incinerated at an Oswego County Energy Recovery Facility and incineration witnessed by OCO staff; or
 - ii. Shredded by electronic paper shredder and overseen by OCO staff.
2. The Facilities Manager will send copies of the completed work order back to the designated documents person who will then enter into the Division Document Storage Database that the documents were destroyed.

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DOCUMENT RETENTION SCHEDULE

It is the policy of OCO to retain documents as required by law and to destroy them when appropriate. The destruction of documents must be approved by the Division Director and logged into Division's Document Storage Database. Some Divisions have more stringent document retention requirements. Please consult with your Division Director for those that apply to your division. The formal document retention for OCO is as follows:

Accident reports/claims (settled cases).....	7 years
Accounts payable ledgers and schedules.....	7 years
Accounts receivable ledgers and schedules.....	7 years
Audit reports of accountants.....	permanently
Bank reconciliations.....	2 years
Bank Statements.....	3 years
Chart of Accounts.....	permanently
Checks (cancelled but see exception below).....	7 years
Checks (cancelled for important payments, i.e., taxes, purchases of property, special, contract, etc.) checks should be documented with the papers pertaining to the underlying transaction).....	permanently
Client Documents.....	7 years
Contracts, mortgages, notes and leases:	
Expired.....	7 years
Still in effect.....	permanently
Correspondence:	
General.....	2 years
Legal and important matters only.....	permanently
Routine with customers and/or vendors.....	2 years
Deeds, mortgages and bills of sales.....	permanently
Depreciation schedules.....	permanently
Duplicate deposit slips.....	2 years
Employment applications.....	3 years
Employee personal documents (after termination).....	7 years
Expense analyses/expense distribution schedule.....	7 years
Financial Statements:	
Year end.....	permanently
Other.....	7 years
Garnishments.....	7 years
General ledger.....	7 years
Insurance policies (expired).....	3 years
Insurance documents, current accident reports, claims, policies, etc..	permanently
Internal audit reports (in some situations longer retention periods	

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may be desirable).....	3 years
Internal reports (miscellaneous).....	3 years
Invoices to customers.....	3 years
Invoices from vendors.....	7 years
Journals (accounting).....	7 years
Minute books of directors including by-laws and charter.....	permanently
Notes receivable ledgers and schedules.....	7 years
Payroll documents and summaries.....	7 years
Personnel documents (terminated).....	7 years
Petty cash vouchers.....	3 years
Property appraisals by outside appraisers.....	permanently
Property documents – including costs, depreciation reserves, end-of-year trial balances, depreciation schedules, blueprints and plans.....	permanently
Purchase orders:	
Purchasing department copy.....	7 years
Other copies.....	1 year
Retirement documents.....	permanently
Requisitions.....	1 year
Sales documents.....	7 years
Subsidiary ledgers.....	7 years
Tax returns and worksheets, examination reports, revenue agents and Other documents relating to determination of income tax liability...	permanently
Time sheets/cards/books.....	7 years
Trademark registrations and copyrights.....	permanently
Training manuals.....	permanently
Vouchers for payments to vendors, employees, etc. (including allowances and reimbursement of employees, officers, etc. for travel and entertainment expenses).....	7 years
Withholding tax statements.....	7 years

This checklist is for your guidance and should be modified to accommodate any special agreements or requirements of grantors or regulatory entities.

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