

# Boyne City Housing Commission Record Retention and Disposition Policy

Adopted by BCHC Board of Commissioners 10/22/2025

The purpose of this policy is to ensure that the Boyne City Housing Commission (BCHC) complies with all federal, state, and local requirements for record retention and disposition. This policy protects BCHC by ensuring records are available for HUD audits, financial statement reviews, litigation, and operational needs, while also ensuring timely and secure disposal of records that are no longer required.

## 1. Scope

This policy applies to all BCHC records, whether physical or electronic, including but not limited to:

- A. Tenant and applicant files
- B. Financial and accounting records
- C. Administrative and Board records
- D. Human resources and payroll records
- E. Property and construction documents
- F. Insurance, grant, and legal records

## 2. Governing Regulations

BCHC's retention and disposition practices are based on the following regulations and standards:

- A. HUD Regulations – including 24 CFR Parts 908, 985, 966, 2 CFR 200.334, HUD Handbooks, PIH Notices, and HUD form instructions.
- B. Federal Auditing Standards – GAO Yellow Book (GAGAS), 2 CFR 200 Subpart F (Single Audit), AICPA standards, PCAOB standards, and IRS rules.
- C. Michigan State & Local Requirements – Michigan Public Records Law (MCL 399.11), General Schedules #31 (Financial), #26 (HR), #8 (Cities/Villages), #10 (Townships), and Michigan Admin Code R.460.2543.

## 3. Record Retention System

- A. BCHC uses Tikler electronic record management to automate retention tracking and reduce paper storage. Electronic records (PDFs, scanned files, emails, TIFFs) stored in Tikler are considered the official record unless HUD or state law specifically requires an original copy.
- B. Physical tenant files are still maintained and contain leases, income certifications, and core eligibility documents. Originals are filed in secure cabinets, and whenever possible tenant documents are scanned into Tikler for backup.
- C. Financial, HR, and administrative records are increasingly digitized. Paper copies may be destroyed once scanned and validated in Tikler, unless state law requires permanent originals.

## 4. Disposition of Records

Authorization – Records may only be destroyed if:

- A. They are past their required retention period per the BCHC retention schedule (Appendix A).
- B. No litigation, audit, or investigation is pending that would require preservation.

## 5. Method

- A. Electronic Records: deleted from systems in accordance with Tikler retention settings; backups maintained until purge date.
- B. Paper Records: securely shredded or disposed through a bonded vendor to prevent unauthorized disclosure.
- C. Confidential/PII Records (tenant SSNs, birth certificates, medical records): must always be shredded, never placed in regular trash.

## **6. Suspension / Hold**

In case of litigation, audit, or investigation, destruction of related records will be suspended until legal counsel authorizes resumption.

## **7. Documentation**

Each destruction event will be logged in Tikler (or manual log for paper) noting the date, record type, volume, and authorizing staff.

## **8. Retention Schedule (Appendix A)**

BCHC maintains a Master Record Retention Schedule. This schedule specifies, by record type, the required retention period under:

- A. HUD Regulations
- B. Auditor/GAO/IRS Standards
- C. Michigan State/Local Schedules
- D. Final Recommended Retention (longest/most conservative period)

The Excel schedule is incorporated by reference into this policy. Staff must consult it before disposition of any records.

## **9. Responsibilities**

- A. The Executive Director is responsible for policy oversight.
- B. The Community Manager maintains Tikler and ensures records are classified correctly.
- C. The Community Manager ensures tenant files (electronic and paper) are properly secured and scanned.
- D. The Board Secretary ensures Board minutes and resolutions are permanently retained.

## **10. Review and Updates**

This policy and the attached retention schedule will be reviewed annually and updated as needed to reflect HUD rule changes, Michigan state schedules, or auditor recommendations.

## Appendix A Record Retention Scheduled

Category	Record Type	Recommended Retention
Administrative	Administrative Policies (ACOP/Admin Plan)	3 years (conservative)
Administrative	Agency Plan & Correspondence	Permanent
Administrative	Annual Audit Reports	Permanent
Administrative	Annual Budgets / Financial Statements	Permanent
Administrative	Annual Department Budgets	5 years (conservative)
Administrative	Board Agendas	3 years (conservative)
Administrative	Board Meeting Minutes	Permanent
Administrative	Capital Fund Grants – general files	3 years (conservative)
Administrative	Energy Audits / PNA	10 years (conservative)
Administrative	Executive Orders / Director Orders	3 years (conservative)
Administrative	HUD Forms (general)	3 years (conservative)
Administrative	Internal Audit Reports	5 years (conservative)
Administrative	Press / News Releases	3 years (conservative)
HR	Accident / Incident Reports	Permanent
HR	Contractor Payroll / Wage Records (DB)	7 years (conservative)
HR	Contractors' Payroll (DB)	7 years (conservative)
HR	EEO Complaints	Permanent
HR	Employee Handbook	3 years (conservative)
HR	Employee Payroll / W-2s	Permanent
HR	Employee Personnel Records	Permanent
Financial	Annual Reports / Major Publications	Permanent
Financial	Bank Deposits / Cash Books	5 years (conservative)
Financial	Bid Bonds / Performance Bonds	3 years (conservative)
Financial	Cancelled & Voided Checks	7 years (conservative)
Financial	Cash Receipts & Disbursements	7 years (conservative)
Financial	Change Orders / Modifications	3 years (conservative)
Financial	Computer-Generated Reports	Retain as needed for audit trail
Financial	Contracts & Agreements (executed)	Permanent
Financial	Criminal History Verification	Retain through eligibility/appeal period
Financial	Electronic Fund Transfer Records	3 years (conservative)
Financial	Eviction Records	keep 5–10 years for legal defense
Financial	General Ledger & Trial Balance	Permanent
Financial	Insurance / Fidelity Bonds	3 years (conservative)
Financial	Investments	3 years (conservative)
Financial	I-9 Forms	8 years (conservative)
Financial	Participant IDs (copies)	3 years (conservative)
Financial	Procurement Documents (RFPs/RFQs/IFBs)	3 years (conservative)
Financial	Project Inspection Records	3 years (conservative)
Financial	Property Files (general)	Life of asset/structure + required years
Financial	Property Ledger / Fixed Asset Subsidiary	Life of asset/structure + required years
Financial	Purchase Orders / Invoices / Receipts	3 years (conservative)
Financial	Real Estate & Equipment Leases	3 years (conservative)
Financial	Real Property Disposition Records	Permanent
Financial	Reasonable Accommodation Requests	3 years (conservative)
Financial	Request/Approval to Move	3 years (conservative)

<b>Category</b>	<b>Record Type</b>	<b>Recommended Retention</b>
Financial	Security Deposit Records	3 years (conservative)
Financial	Servers/Hardware Inventory	Until obsolete; document disposal
Financial	Unemployment Records/Claims	State UI law governs; keep 6–10 years
Financial	Unsuccessful Bids/Proposals	1–3 years after award (HUD 7460.8)
Financial	Waiting List	3 years (conservative)
Financial	Warranties	Until expired
Financial	Worker’s Compensation Records/Claims	Life of asset/structure + required years
Financial	e-LOCCS Authorization Forms	Permanent
Program	Annual Recertification Packets	3 years (conservative)
Program	Applications for Public Housing/HCV	3 years (conservative)
Program	Check Register / Vouchers	7 years (conservative)
Program	Grievances & Informal Hearings	3 years (conservative)
Program	HUD 50058 Forms	50058 years (conservative)
Program	Income Verifications (non-EIV)	3 years (conservative)
Program	Journal Vouchers	5 years (conservative)
Program	Monthly Income & Expense Reports	7 years (conservative)
Program	Petty Cash Vouchers	3 years (conservative)
Program	SEMAP Files	5 years (conservative)
Program	Tenant Ledgers	4 years (conservative)
Program	Tenant/Participant Files	3 years (conservative)
Program	Unit Files (inspections, work orders, appliances)	3 years (conservative)
Program	Vouchers Issued (HCV)	3 years (conservative)
Program	Withdrawn/Ineligible Applications	3 years (conservative)