

HAMILTON PLACE, GREENBELT, MARYLAND 20770

Area Code (301) 474-4161 Fax (301) 474-4006



REVISED

Record Retention Policy

February 2019

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PURPOSE

The purpose of this Record Retention Policy is to specify the lengths of time that books and records of Greenbelt Homes Inc. (GHI) and Greenbelt Development Corporation (GDC), shall be kept and the procedures for disposing of such documents at the end of their retention periods. These books and records may be in paper format (e.g., documents, papers, letters, contracts, maps or books); electronic format e.g. tapes /discs, photographs, film or sound recordings, and data- or image-processed documents that are stored on computers.

Books and records are to be kept and managed in a consistent and organized manner, to comply with applicable legal and regulatory requirements, promote business efficiency, minimize expense for unnecessary storage, and to make it easier to locate records when needed.

The record retention periods specified in this policy are based on the need to keep records for historical reference; to satisfy contractual, legal or regulatory requirements; and for other purposes as set forth in this policy. GHI/GDC staff members must dispose of records that have satisfied their required period of retention and are no longer needed.

GHI/GDC expects all officers, directors, employees, contractors, volunteers and any other agents or representatives to follow the rules and procedures set forth in this policy document.

IMPORTANCE OF ARCHIVAL MATERIAL

GHI has possession of primary source materials important to the founding of the federal planned community and of the housing cooperative. Many of these records are original and unique copies that cannot be consulted elsewhere, including the Library of Congress and the National Archives. These records include a daily log of workers on the job, their worksites, and tasks; iterations of the Member Handbook over the history of the community; various newsletters and community communications that are likely to be found only in the mementos of residents; and numerous maps and plats.

Such records can never be replaced.

The GHI co-operative began as a planned community built by the Resettlement Administration, one of President Franklin D. Roosevelt's New Deal initiatives intended to provide relief to those suffering from the economic downturns of the Great Depression. Rexford Guy Tugwell, an assistant Secretary of Agriculture and the first head of the RA, planned to build a series of "cooperative communities where the built environment would reinforce community spirit and cooperation among its residents." (Greenbelt Museum) Drawing inspiration from Ebenezer Howard's green town model in England, Tugwell's green towns would combine "the best aspects of a rural life: lakes, woods, and open spaces with the best aspects of an urban life: recreational facilities, theaters and shops" (Greenbelt Museum). Tugwell's plans were controversial and potentially expensive, so only three green towns were actually constructed--Greendale, WI; Greenhills, OH; and Greenbelt, MD.

Of the three original green towns, Greenbelt is the most intact, due to the fact that the housing units - brick, block, and frame dwellings - were purchased from the federal government in 1952 by a co-operative group of residents. This cooperative, initially called the Greenbelt Veterans Housing Corporation, is now Greenbelt Homes, Inc.

The story of Greenbelt Homes, Inc. is central to the story of the unique city of Greenbelt. It has major achievements that include preserving the original structures, parks, and pathways of the planned community while also outfitting them for post-modern living. GHI has taken on this daunting task in caring for all 1600 housing units, which includes townhomes, single-family dwellings, apartment buildings, cottages, and other original structures. This stewardship of the





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original, historic fabric of the community, and the fostering of the cooperative spirit, has allowed the atmosphere and quality of life championed by Rexford Guy Tugwell and the RA to continue to survive and flourish.

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Greenbelt has been the subject of more than 15 books, numerous articles, films, videos, and documentaries. It attracts visitors from all over the world for its significance to the history of planned communities; utopian experiments; the co-operative movement; the Great Depression and New Deal; and the history of landscaping, architecture, and mid-twentieth century material culture.

RETENTION REQUIREMENTS

Electronic records subject to these retention requirements include those records maintained on GHI/GDC computers and other electronic devices that are provided to employees for business use. However, if you use a personally owned device for GHI/GDC purposes, either on the organization's premises or elsewhere, any GHI/GDC business documents on the device are also subject to these retention requirements.

It is the content of the record that determines its retention period. For instance, an email can be a very significant correspondence with a 20 year retention period or a casual communication that can be deleted immediately. As set forth herein, GHI/GDC attempts to define retention periods based upon content type. To the extent the retention period is not clear; the document should be retained for not less than three years, and the General Manager or his/her designee must approve the deletion of the document.

As circumstances may dictate, the General Manager or his/her designee may issue a "legal hold," suspending the destruction or deletion of any records due to pending, threatened, or otherwise reasonably foreseeable litigation, audits, investigations, or similar proceedings. If and when GHI/GDC staff is informed of such a hold, any documents relevant to the matter must not be destroyed or deleted until the General Manager or his/her designee, after consultation with GHI legal counsel, removes the "legal hold." The "legal hold" directive must inform staff of the specific types of documents that must be retained for these purposes. If in doubt as to what is relevant, staff are required to seek clarification from the General Manager or his/her designee before destroying or deleting any document. The directive must also make clear the time period for which the documents must be retained. During that retention period, any document that may be relevant must not be destroyed or deleted without the written approval of the General Manager or his/her designee.

No officer, director, employee, contractor or volunteer of GHI/GDC shall knowingly destroy or delete a document with the intent to obstruct or influence any investigation or proper administration of any matter by any government department, court or agency. This requirement covers all records and documents of GHI/GDC.

Archival Records should be retained in perpetuity and <u>may NOT be destroyed</u> except in cases of severe damage due to fire, smoke, water, rodents, insects, mold, or extreme disintegration.

In all other circumstances, documents listed in the schedule below must be retained for the periods of time set forth on this schedule. Please note that the information listed in the schedule below is intended as a guideline and may not contain all records that may be required to be retained in the future.

Records exist in electronic, hard copy (paper) and other formats. The following are types of records:

1. <u>Transitory Records.</u> A transitory record is a record with short-term value and does not have to be kept for the full retention period. Examples of transitory records generally include:



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- a) preliminary drafts of letters, reports, pleadings, etc., after the final is prepared and the drafts are no longer useful;
- b) duplicate copies of documents already on file, that have been retained only for convenience;
- c) casual e-mail or written correspondence about scheduling or other matters that have no substantive significance;
- d) routing slips, voice-mail, phone messages, miscellaneous notices or memoranda;
- e) additional information copies of widely distributed materials or information received as part of a distribution list, list servs and other Internet distribution sources, solely for convenience of reference;
- f) duplicate stocks of obsolete publications, pamphlets or blank forms; and
- g) unsolicited advertising.

Notwithstanding the foregoing list, there may be instances where a particular otherwise "transitory record" may have important legal or other significance and should not be deleted or destroyed. The General Manager or his/her designee should be consulted about any such record before destruction or deletion.

- **2.** <u>Electronic Records.</u> In general, GHI/GDC staff must store records in electronic form, rather than in paper format, on GHI's document server.
- 3. <u>Archival Records.</u> These are records that a department has stored for the required retention period and no longer are in regular use, but may be of sufficient historical importance that they should be kept indefinitely or permanently.

Disposing of Records

Transitory records must be deleted or disposed of when they have no further business value. Electronic non-transitory records must be disposed of at the end of their retention period. Records containing confidential or sensitive information must be shredded, permanently deleted or otherwise disposed of in a manner that ensures that the information may not be disclosed. Paper records that do not contain confidential or sensitive information may be recycled or simply discarded. When paper records (other than transitory records) are disposed of, each department is responsible for creating and maintaining a record showing the following:

- a) Type of record disposed;
- b) Method of disposal;
- c) Name of the supervisor authorizing the disposal; and
- d) Date of the disposal.

To remain in compliance with GHI/GDC requirements, GHI/GDC staff will:

- Maintain and enforce security procedures
- Keep records and monitor security issues
- Communicate security information and requirements to appropriate staff or IT providers, and coordinate and conduct security awareness training for staff
- Conduct quarterly review of User ID network passwords
- Report any evidence of unauthorized access or known security breaches

Security Safeguards

1. Only authorized staff will have access to the shared drives on company computers and other document repository systems or other computer software programs.



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- 2. All users of the GHI/GDC systems will have a current signed User Agreement on file.
- 3. GHI/GDC will keep a record of all authorized users, including date access was granted and date access was revoked, if applicable.
- 4. All employees issued keys will complete a form acknowledging receipt. These employees will sign a log with their name, date of issue and date of return.
- 5. Work areas containing sensitive information will be shielded from the public.
- 6. Unauthorized staff or other unauthorized persons shall not be given access to work stations and computers of authorized persons.
- 7. GHI/GDC staff will not leave resident folders exposed on desk tops or computer screens open with sensitive data unattended.
- 8. GHI/GDC staff will never take any resident files home for any reason. If it is necessary to transport resident files between GHI/GDC offices, the files will be transported in a secure manner.
- 9. GHI/GDC staff must remove member/resident printouts from the printer immediately to ensure that nothing is inadvertently left vulnerable to unauthorized access.
- 10. Member/Resident credit, income, and other reports should be retained for the duration of the membership/tenancy, plus three years from the end of the membership/tenancy.
- 11. GHI/GDC staff will keep a log of all documents shredded, including name of employee disposing of document, description of document, method of disposal and date of disposal.
- 12. At the close of business each day, member/resident files (if applicable) will be locked in file cabinets and the file cabinet areas will be locked. In addition, member/resident and applicant information must not be accessible or visible to non-GHI/GDC staff or non-approved third party management.
- 13. GHI/GDC staff will review security procedures periodically to ensure compliance and safeguard against breaches.

Location and Access of Archival Records

- 1. GHI Archival Records must be stored in an appropriate location.
- 2. A Finding Guide must be created for GHI's Archival Records.
- 3. GHI Archival Records must be readily available for members, staff, and researchers to consult.
- 4. GHI Archival Records that are digitized must NOT be destroyed but retained in long-term storage with proper climate control.

Care and Handling of Archival Records

- 1. Documents, photos, maps, plats, etc. that are very brittle or otherwise very fragile may NOT be digitized.
- 2. Sheets of paper including maps and plats should be stored flat in acid free file folders in acid free boxes or cabinets.
- 3. Sheets of paper that are brittle or otherwise fragile should be stored in mylar sleeves.
- 4. All photographs must be stored in mylar sleeves.
- 5. Documents in binders must be re-housed in acid-free binders or files or boxes.
- 6. All staples, metal paper clips, and brads must be removed and replaced with plastic fasteners.

Compliance Oversight

The General Manager is responsible for enforcement of this requirement. Please direct any questions regarding the retention of documents not listed in this schedule to the General Manager.



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Please note that failure to follow this requirement can result in possible civil and criminal sanctions against GHI/GDC and its officers, directors and employees, and possible disciplinary action against responsible individuals, up to and including termination of employment.



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RETENTION SCHEDULE

Archives

Document Category	Document/Record Description	Retention Period
any and all planning and construction documents for the original town including residential, commercial, and industrial structures (Greenbelt Project or Berwyn Project)		Permanent
any and all planning and construction documents for the defense community including residential, commercial, and industrial structures		Permanent
any and all documents relating to the founding of the GHI co-operative (including any records from the Greenbelt Mutual Home Ownership Corporation and Greenbelt Veterans Housing Corporation)		Permanent
any and all minutes and agenda for GHI Board of Directors, committee, subcommittee, and task force meetings and projects		Permanent
any and all community/member newsletters, publications, and communications including posters, flyers, and brochures		Permanent
any and all maps and plats that are undatable and any and all that are datable prior to 2000		Permanent
any and all original photographs of community/member activities and events of any date		Permanent
any and all editions of the GHI Member Handbook		Permanent
any and all documents and photos relating to the National Register of Historic Places application, nomination, and maintenance		Permanent
any and all original photographs of residences and other structures original to the green town or in GHI		Permanent
any and all materials relating to celebrations and commemorations		Permanent
any and all correspondence with visitors, including visitor logs from the community's early years		Permanent
any and all signs and architectural fragments from 1935 to 2000		Permanent



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Management Office

<u>Document Category</u>	Document/Record Description	Retention Period
Approved Board	Formal statements of decisions made by the Board of Directors	Permanent
Resolutions	of GHI and GDC.	
Approved Board Meeting	Approved official minutes of open and closed meetings of the	Permanent
Minutes	Board of Directors of GHI and GDC.	
Board Agenda Materials	Includes regular and special meeting agendas, Board reports,	Permanent
	committee packets, manager's memorandum, and records	
	distributed or otherwise submitted into the record during a	
	regular or special meeting.	
Board Files	Files containing information on former Board members, articles	Permanent
	of dissolution, etc.	
Maryland Local	Court documents/records related to injury or other matters	4 years (except for a
Government Tort Claims	covered under Maryland Tort claims.	claim involving a minor,
(LGTCA) Notices		which is 21 years)
Memoranda of	MOU or Agreement between GHI/GDC and any federal, state or	10 years from the
Understanding (MOU)	governmental entity or non-profit corporation. General	termination of the
	Counsel will determine if other retention period is necessary.	agreement
Records Retention and	Records documenting the destruction of damaged records that	Permanent
Disposition Files	could not be recovered, inventories, disposal requests and	
- 11:	authorizations, schedules and reports, etc.	-
Public Meeting Notices	Board public/special meeting notices, including proof of posting	5 years
	and/or publication.	
Recordings of Open	Video and audio tape recordings of meetings.	Until minutes of the
Session Meetings		meeting are approved.
Strategic Plans	Annual Strategic Plan and 5-Year Plan Public notices (including	5 years for Annual plan;
	posted and published notices); materials presented at public	15 years for Five-Year
	meetings; agendas, reports and minutes of meetings at which	Plan
	the plan is considered and/or approved, and executed copies of	
	any adopted resolutions related to the Plan. Also includes	
	originals of the written comments received from the	
	membership concerning the Plan and copies of any GHI/GDC	
	correspondence responding to the same.	



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Member Services

Document Category	Document/Record Description	Retention Period
Complaint matters	Records related to member complaints, lease violations, investigation activities, correspondence, supporting documentation, etc.	5 years after closure of the complaint.
Reasonable Accommodation Requests	Reasonable Accommodation Request form, interpreter requests, letters/notes, appeals, salary etc.	5 years after determination or action. Immediately shred records containing medically sensitive information following determination or store on secure server (unless appealed, then destroy after appeal decision).
Waitlist Applications for GDC Parkway Apts.	Includes documentation of the activities involved in the preparation, maintenance and publication of the certified waiting list.	5 years
Complaint Panel/Informal and Formal Hearing Records	Includes audio recordings, recommendations, and records of any panel or hearing, copies of all documents, records, requests, and exhibits submitted for the panel/hearing, Board's written decision, and notices/correspondence regarding the outcome.	5 years after decision
Criminal Background Check Results	Includes results from database criminal history record information and fingerprint checks.	Shred immediately (If appealed, shred upon completion of hearing or due process)
Investigation Case Files	Member Services complaint investigation records including, photographs findings, includes original documents such as correspondence, notices, materials from formal and informal hearings and investigative reports, etc.	5 years after agency action or final judgment
Member Services/ GDC Parkway Apt. File Records	Includes mediation agreements, participation forms, non-transitory correspondence (including letters of information or corrective action), substantive legal notices (including rent adjustments), reports, notes and other materials documenting interactions with member/resident, inspection records, etc.	5 years after move out participation ends
RV/Boat Lot and Storage Files	Boat lot and storage leases, supporting documentation, forms, etc.	5 years after lease ends
Transfer Waiting List Activity File re: GDC Parkway Apts.	Documentation of transfer requests for administrative, emergency, or reasonable accommodation including outreach activities, intake and processing of applications, notices, and other activities related to offering units, etc.	5 years after participation ends
Vacated Resident – Debt Owing Files re: GDC Parkway Apts.	Retain records concerning debts owed or termination of assistance until the debt is paid in full.	12 years after end of participation
Vacated Resident – Do Not Re- Admit re: GDC Parkway Apts.	Permanently retain documentation used to substantiate fraudulent misreporting of income.	Permanent
Vacated Resident – Good Standing	Retain files of participants who vacated the premises	5 years after participation
re: Parkway Apts. Vacated Resident - Accounts Receivable (Debt Collection) re: Parkway Apts.	Includes record copies of court judgment, judgment liens and/or tax intercept records, copies of records documenting the receipt of payments made in satisfaction of the judgment, and copies of applicable repayment or settlement agreements. Includes financial statements and bank deposit statements related to moneys owed by participants/residents. Requires periodic review.	ends Retain until the end of the 12-year judgment period plus an additional 10 years or when judgment is satisfied plus 12 years, whichever occurs first



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Finance & Accounting Department

Retention Category	<u>Document Description</u>	Retention Period
Accounts Payable	Supporting documentation on accounts paid by GHI/GDC, such	5 years after audit
	as vendor pay packages, purchasing cards, out-of-town travel	
	and wire transfers. Files also include general ledger interface	
	reports, check run reports and transmission, cash receipts, etc.	- c
Accounts Receivable	Documentation related to receivable records such as invoices,	5 years after audit
٨٠٠٠٠	ledgers, schedules, checks, money orders (remote deposit) etc.	Cucano often audit
Audit	Includes the following records: approved accounts analysis	5 years after audit
	packets, staff working papers, audit related correspondence and GHI/GDC responses to questions arising during the	
	process. Financial audit report, auditor's management letter,	
	and responses to the auditor's management letter.	
Bond Accounting/Cash	(a) For records pertaining to general obligation bonds	(a) 12 years (from end of
Management File	(b) All other records including cash management investment	fiscal year)
	tickets that contain details of investment transactions such as	(b) 5 years
	purchase of investment pools, certificates of deposit, bonds,	
	commercial papers, repurchase agreements, or other	
	securities.	
Budgets	Staff reports and back-up documentation, including	5 years after audit
	department budget submissions, worksheets/analysis,	
- 1 /=:	adjustments, and salary surveys.	- c
Cash/Financial	Petty Cash reconciliation, deposit records, wire transfer	5 years after audit
Management	documents, checks, returned deposit items, GHI/GDC bank	
General Accounting	statements/activity logs, stop payments, etc. Records including approved general ledger account	5 years after audit
General Accounting	reconciliation, fluctuation analysis, source data, monthly	5 years after addit
	electronic confirmation, bank statements, bank activities and	
	transactions reports, approved bank reconciliation and related	
	schedules, documentation supporting adjustment, monthly	
	statements of reserve accounts held by various trustees, copies	
	of checks received by GHI/GDC, deposit tickets, journal entries	
	pertaining to loan receipts, various income streams, grants,	
	electronic banking activities.	
Debt Collection	Includes records of court judgment, judgment liens and/or tax	12 years after judgment is
	intercept records, receipt of payments made in satisfaction of	satisfied or 12 years after
	the judgment, and copies of applicable repayment or settlement	judgment renewal
	agreements. Should have periodic reviews during the retention	
Dayroll Accounting	period.	6 years after audit
Payroll Accounting Records	Employee files containing payroll documentation, including address, dates of birth, occupation, compensation, hire and	6 years after audit
Records	termination dates. Also includes individual contracts;	
	wage/hour notices; records of additions to or deductions from	
	wages, including documentation of payments by GHI/GDC on	
	behalf of employees for taxes, benefit plans, the employee	
	retirement data and other deductions; deduction	
	authorization; beneficiary designations, unemployment claims,	
	tax levies, withholding orders and garnishments and W-2	
	forms.	
Payroll Rate and Time	Includes time cards and records that document actual hours	6 years after audit
Records	worked by employees and amounts of leave taken. Includes	
	leave accrual and usage records; authorization for extra hours,	
Dayroll Pagistors	overtime documentation.	6 years after andit
Payroll Registers	Electronic files documenting benefits, payroll, and other payments to or on behalf of employees.	6 years after audit
Purchasing	Includes requisitions for purchase orders, blanket orders,	5 years after final
i urciiasiiig	encumbrance release orders and contract orders, credit card	payment
	statements and records of card users.	payment
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Repayment/Settlement Agreements	Records related to repayment and settlement agreement such as signed repayment agreement payments received, judgment, lien or tax intercept records, etc.	12 years after term of agreement ends
Tax Records	Tax returns with any related and/or supporting documentation including registration renewals and statements of information for various entities, 1099 reports for owners and vendors, IRS Annual Return of Withheld Federal Income Tax (Form 945), IRS Application for Tax Exempt Status, determination letters, annual returns, etc.	7 years after audit
Parkway Resident Accounting	Documentation related to resident accounts receivable and ledger records such as invoices, ledgers, cash receipts (rent and security/sure deposits), security deposit records (including refunds), etc.	5 years after audit
Expense Records	Reports completed by employees to reconcile various expenses, including travel.	5 years
Miscellaneous	Contact your supervisor regarding any miscellaneous documents related to Finance and Accounting. All other unidentified documents are subject to the miscellaneous retention period.	5 years after last action



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General & Support Services

Retention Category	Document Description	Retention Period
Audit Records	Retain departmental budget background records accumulated	4 years after the close of
(Departmental)	in the preparation of annual budget estimates until covered by	the fiscal year
	the budget. Does not include official audit records for which	
	the Finance Department is the Department of Record.	
Vehicle Title and	Warranty documents, Department of Motor Vehicle title and	Life of vehicle plus 4 years
Registration Records	registration records.	
Equipment Records	Includes original operating instruction booklets, service	Life of equipment plus 4
	agreements, warranty information, replacement part	years
	information, technical reference booklets, purchasing	
	information, and owners' manuals which document the use	
Lamel Advantiation	and maintenance of equipment purchased by the department.	E.V. a. after a delication
Legal Advertising	Includes published or posted legal notices, original proofs of publications and other legal publications.	5 Years after publication
Membership Records	Includes records in support of GHI/GDC's payment of	End of current year plus 4
	membership of staff in professional organizations (i.e., dues).	years
Policies, Procedures,	Policy, procedure, guideline or requirement documents for all	Until repealed or revised,
Guidelines, and	departments affecting GHI/GDC operations, critical functions,	plus 4 years
Requirements	etc. Includes general orders, standards, guidelines, forms,	
	safety rules and regulations, best practices, etc.	
Mail Services/File Printing	Mail-related records such as service requests concerning	While useful
Service Requests	business replies, express mail, and postage due. Records	
	concerning requests for printing services.	
General documents	Memoranda, forms, letters, reports, meeting minutes,	3 years after obsolete
	compliance tips, etc.	
Vehicle Maintenance	Includes owner manuals and records regarding work completed	Life of the vehicle plus 5
	on vehicles including but not limited to: requests for service,	years
	vehicle maintenance and repairs, smog test documentation,	
	daily-usage logs, and incident reports.	
Subpoena	Subpoenas received from legal agencies.	3 years (store on secure server)
Standard Operating	Requirements, guidelines, policies/procedures for each	3 years after repeal or
Procedure	division.	revision
Miscellaneous	Contact your supervisor regarding any miscellaneous	5 years after last action
	documents related to General and Support Services. All other	
	unidentified documents are subject to the miscellaneous	
	retention period.	



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Human Resources

Retention Category	Document Description	Retention Period
Benefit Plan Documents and Contracts	Contracts and agreements related to the provision of benefits to GHI/GDC employees. Included are contracts and agreements for medical, dental, vision, disability, and life insurance.	6 years after superseded
Direct Deposit	Includes payment registers, bank statements, backups, ACH authorization agreement, voided checks, etc.	6 years after audit
Equal Opportunity Records	Complaint records, investigation results, interviews, etc.	3 years after separation
Employee Handbook and Orientation Packets	Information distributed at employee orientation for newly hired employees	5 years after superseded
Employment Verifications	Includes documentation of personal loans, workers' compensation inquiries, state disability, child support, unemployment questionnaires, etc.	6 years after separation
INS Form I-9 (Employment Eligibility Verification Form)	Includes documents for hired employees such as form I-9 and attachments, copies of documents establishing identity and employment eligibility.	6 years after separation
Leaves of Absence under Family Medical Leave Act	Employee records pertaining to compliance with FMLA's leave requirements.	6 years after separation
Personnel File	Includes job applications and resumes of successful applicants, pre-employment medical evaluations, background information and fingerprints, W-4 forms, contracts, salary actions, wage rates, disciplinary actions, evaluations, personnel action forms, applications for leave (other than FMLA), Immigration Reform and Control Act forms, benefit forms, correspondence and reports related to employees, etc.	6 years after separation
Reasonable Accommodation (GHI/GDC Employees)	Includes documents used to determine reasonableness and nexus between the requested accommodation and disability.	6 years after application
Recruitment	Applications, resumes and materials submitted by unsuccessful prospective employees, including other records such as job postings, job classifications and other terms and conditions of GHI/GDC employment.	3 years after close of recruitment period or after decision
Training Records	Documentation of staff training, including certificates earned, sign-in sheets, and training materials. Does not include payment records maintained by the Finance Dept. or records required to be maintained to document compliance with federal or state statutes, regulations, or guidelines.	3 years after separation
Miscellaneous	Contact your supervisor regarding any miscellaneous documents related to Human Resources. All other unidentified documents are subject to the miscellaneous retention period.	5 years after last action



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Information Technology

Retention Category	Document Description	Retention Period
User Access Records	User Access records qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. Includes records indicating levels of access permitted to individual users and groups of users.	Until superseded or obsolete
Usage And Monitoring Records	Usage And Monitoring records qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. Includes records documenting details and/or summaries of the use of computer resources including login files, system usage, and internet usage	Until superseded or obsolete
Help Desk Tickets and Responses	Records documenting requests for IT helpdesk, call center, and other services and the responses thereto, including but not limited to helpdesk tickets, request tracking information, communications, and descriptions/reports of services provided.	1 year
Backup Files	Backup files qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied.	Until superseded or obsolete
System And Data Documentation	System and Data Documentation qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. Includes records documenting systems and data including network configuration maps and plans, data dictionaries, flow charts, specifications, file layouts, source code, metadata, system change notices, and security records	Until superseded or obsolete
Software and Hardware Inventory Records	Software and Hardware Inventory records qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. As such, these records may be disposed in an appropriate manner as soon as they are superseded or become obsolete. Includes running inventories of hardware and software used to track locations, to whom assigned, and licensing information	Until superseded or obsolete
Hardware and Software Documentation and Maintenance Records	Hardware and Software Documentation and Maintenance records qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. Includes scope of work service level and maintenance agreements, licensing agreements, warranties and reference manuals, maintenance logs, and any other records documenting the operation and use of IT hardware and software.	Until superseded or obsolete
Design and Implementation Project Records	Design and Implementation Project records qualify as Transitory records that have very short-lived business, financial, legal, research or archival value and are not subject to any legal recordkeeping requirements, explicit or implied. Includes records created during the design and implementation of information technology systems and applications including but not limited to schedules, plans, tracking, analyses, proposals, draft documentation, evaluations and test results.	Until superseded or obsolete



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Maintenance/Technical Services/Homes Improvement

Document Category	Document/Record Description	Retention Period
Addendum	Documents signed by members added to the MOC addendum	Permanent
	for addition maintenance/replacement of electronic	
	thermostats, HVAC, etc.	
Bids and Proposals	Records related to successful, rejected, unopened, protests, or	Permanent, if accepted
	sealed bids and proposals. Includes correspondence related to	1 year, if rejected
	fee for service, disputes, meeting minutes, agreements,	
	appeals, etc.	- 6 11 11
Claims (Insurance)	Official records of liability claims filed by or against GHI/GDC or	5 years after the claim is
Paid/Denied	any of its instrumentalities or affiliates in connection with facilities operated by GHI/GDC until. Includes correspondence	resolved
	and settlement or repayment agreements.	
Contracts – Services and	Contracts, requisition, reference forms, purchase order, bond	Permanent
Commodities	and surety records, correspondence and related papers	T CITITATION
Commodities	pertaining to contract award, administration and payments	
	related to awards and contracts for services and commodities.	
	Includes records reflecting the rationale for the method of	
	procurement, selection of contract type, contractor selection	
	or rejection, and the basis for the contract price. Does not	
	include design, construction and development-related files.	
Development and Design	Certificates of Occupancy, zoning documents, specifications,	Permanent
Plans	condemnation records, etc. Includes blueprints or any	
	development plans related to GHI/GDC.	
Environmental Records	Negative declarations, environmental site assessments,	5 years from the date
	environmental impact reports, statements of overriding	after which the property
	consideration, etc.	has no affiliation or
		ownership by GHI/GDC or related entities
Inspection Paparts and	Droparty inspection reports and results, including inspection of	Permanent
Inspection Reports and Remediation Actions	Property inspection reports and results, including inspection of lead-based paint/asbestos, presale inspection checklists/forms,	Permanent
Remediation Actions	seller certification, GHI Intent to Sell, addition certification,	
	resale inspection requirements, and hazard reduction or	
	remediation activities conducted.	
Inventory Files	Inventory reports, reconciliation, etc.	5 years after reconciled
Permits	Building permits, appraisals, property improvement records,	Permanent
	etc.	
Purchasing File – General	Includes requisitions for purchase orders, blanket orders,	5 years after final
	encumbrance release orders and contract orders, credit card	payment
	statements and records of card users.	
Real Property Lease and	Includes original property lease or rental	5 years after
Rental Agreements	agreement/amendments and related correspondence, etc.	completion/cancellation
		of the lease agreement
Real Estate Acquisition	Deeds of trust, grant deeds, title records/reports, purchase and	12 years
and Disposition Records	sale agreement, site assessments, escrow instructions,	
	appraisals, etc.	
Surplus Equipment Disposal Records	L Bosonds including invitations, hids, accontances, lists of	5 years after final
DISDOSAL RECORDS	Records including invitations, bids, acceptances, lists of	
	materials, evidence of sales and related correspondence.	payment
Surveys	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade	payment 1 year after close of HIP
Surveys	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit.	payment 1 year after close of HIP cohort
	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including	payment 1 year after close of HIP
Surveys	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application,	payment 1 year after close of HIP cohort
Surveys Vendor Files	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application, voided check, W-9, vendor code, etc.	payment 1 year after close of HIP cohort 5 years after participation
Surveys	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application,	payment 1 year after close of HIP cohort 5 years after participation 5 years after work order
Surveys Vendor Files Work Orders	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application, voided check, W-9, vendor code, etc. Maintenance work order requests	payment 1 year after close of HIP cohort 5 years after participation 5 years after work order is closed
Surveys Vendor Files	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application, voided check, W-9, vendor code, etc. Maintenance work order requests Contact your supervisor regarding any miscellaneous	payment 1 year after close of HIP cohort 5 years after participation 5 years after work order
Surveys Vendor Files Work Orders	materials, evidence of sales and related correspondence. Document signed by individual member indicating upgrade choices for unit. Includes records regarding vendor applications (including contractors and sub-contractors), direct deposit application, voided check, W-9, vendor code, etc. Maintenance work order requests	payment 1 year after close of HIP cohort 5 years after participation 5 years after work order is closed



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Transitory Records

Document Category	Document/Record Description	Retention Period
Activity Records	Records documenting routine activities (i.e. calendars,	While useful
	appointment books, schedules, logs, etc.)	
Advertising Material	Solicited or unsolicited information received from businesses or	While useful
	individuals advertising their products or services (i.e. electronic	
	brochures, company profiles, sales letters, etc.).	
Correspondence	Routine correspondence that requires no administrative action,	While useful
(Routine)	policy decision, or special handling and is not subject to any	
	specific legal requirements.	
Drafts of Records	Preliminary or tentative versions of a record that do not form	While useful
	significant stages in the preparation of a final documents.	
	Drafts that are legally required, acted upon, or applied must be	
	retained according to their intended record type (i.e. policies,	
	procedures, requirements, budgets, etc.) as listed elsewhere in	
	the Record Retention Period.	
Duplicates	Exact copies of documents where nothing has been added,	While useful
	changed, or deleted (i.e. photocopies of paper documents;	
	copies of government brochures and pamphlets; duplicates of	
	microfilm, CD-ROMs, DVDs, etc.)	
External Publications	Books, magazines, periodicals, pamphlets, brochures, journals,	While useful
	newspapers, etc.	
Notices and Memoranda	Notices including memoranda and other records that do not	While useful
(Routine)	serve as the basis of official actions and are routine in nature,	
	such as those pertaining to meetings, holidays or special events	
	circulated to all staff or posted in public folders.	
Promotional and Public	Promotional and public relations materials (i.e. audiovisual	While useful
Relations Materials	items, photographs, flyers and brochures, newsletters, press	
Prepared by or for	releases, published reports, bulletins, etc.). Documents that do	
GHI/GDC	not contain significant information or substantial evidence of	
	plans and directions for agency activities, or critical information	
	that is not contained in other GHI/GDC records. Does not	
	include Section 8 Owner Newsletters or Housing Services Resident Newsletters.	
Reference Materials		While useful
(Outside Sources)	Sources of information that were intended primarily for	while userui
(Outside Sources)	consultation and, if used to prepare or update a formal or ongoing record, are cited as needed. Includes duplicate,	
	informational, extra, unofficial, or informal copies of records	
	that were kept only for convenience or quick reference.	
Research, Notes and	Calculations, short informal notes such as phone messages and	While useful
Working Files	notes collected and used in the preparation of documents,	wille userui
Working Files	written down for review, or as an aid to memory, or to inform	
	someone else.	
Requests	Requests and responses for forms, publications, records, and	While useful
Requests	other agency information that, with the exception of redacting	willie ascial
	confidential and privileged information, do not require	
	administration review before, or further action after, the form,	
	publication, record, or other agency information is provided.	
Temporary Information	Telephone messages, routing slips, self-adhesive notes,	While useful
and the state of t	memos, notes, messages, mail service and printing service	
	records that have only immediate or short–term value.	
Worksheets	Forms, checklists and other worksheets used to prepare or	While useful
	update a formal or ongoing record or informally track	
	workflow.	
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