



Approved: _____

Date: _____

General Operations Manual
Administration and Management

Risk Prevention and Management
Records Retention

Record Retention

Policy:

Agency records shall be maintained in an orderly manner, in a safe and secure location either on site in secured file cabinets or containers that provide protection from damage due to fire or water, loss, theft and authorized access or destruction.

Use of records, both electronic and paper is available to authorized personnel who have involvement with a case and supervisory personnel. Client's confidentiality will be protected according to the Confidentiality Action of the MHDD Code, the Health Insurance Privacy and Portability Act (HIPAA), HITECH and rules set forth by the Illinois Department of Children and Family Services (DCFS) as well as best practice standards determined by the Children's Place Association.

Off-site storage will only take place with a reputable record management company secured for such services by Children's Place Association management. The off-site storage company will demonstrate an understanding of the confidential nature of The Children's Place Association records and will abide by state and federal rules regarding confidentiality.

A record shall be maintained on the premises of the administrative offices detailing the exact location of all records stored off site. Current records including corporate documents as well, as records that were active in the past two fiscal years, shall be maintained on site.

Paper and electronic records containing client information may be removed from the premises only by authorized personnel, to the person transporting the record, in order to conduct official business only.

Records will be placed in a locked box for transportation and shall be transported in a locked trunk or in the event that the vehicle does not have a trunk, the vehicle shall be locked at all times to ensure security of the records.

Records shall be returned and properly stored immediately following the completion of the business. In the event that authorized personnel in charge of the record would be unable to return records by agreed upon timeframes, the status and location of the record will be confirmed, and arrangements made as soon as possible to return the record in a secure manner.

The length of record retention is determined by the type of record as detailed below.

Procedures:

1. General records from Children's Place Association operational departments will be maintained by the required established procedural guidelines established by the agency. The MIS/IT Administrator will ensure that all electronic records will be properly archived.
2. All closed financial records including accounts payable ledgers and schedules, expired contracts, expense analyses/expense distribution schedules, invoices, payroll records and summaries and withholding tax

statements shall be maintained for at least seven years.

3. Audit reports, all checks for important payments and purchases, all legal correspondence, deeds, mortgages and bills of sale, depreciation schedules, year-end financial statements, insurance records, claims and policies, retirement records, tax returns, trademark registrations and copyrights and all minute books, bylaws and charters shall be considered part of the permanent record of the Corporation and shall be retained in perpetuity by the agents of the Corporation
4. All closed Board and administrative records shall be considered part of the permanent record of the Corporation and shall be retained in perpetuity by agents of the Corporation.
5. All closed personnel records shall be retained for at least three years beyond the date of the employee's separation from the agency (Federal Labor Law). Noncurrent files shall be kept in a secure area, and in containers that provide protection from damage, loss, theft, and unauthorized access or destruction.
6. Foster Parent Licensing records shall be maintained for at least six years after the following criteria are met; the foster family fails to renew their license and it expires; an official denial or withdrawal of an application for licensing; the date of closure or revocation of the license, Following the six years, the foster parent licensing file shall be transferred to DCFS.
7. If any litigation, claim, financial management review, or audit is started before the expiration of the six-year period, the records shall be retained until at least three years after all litigation, claims or audit findings involving the records have been resolved and final action taken.
8. Child case records shall be maintained for at least seven years after the child attains the age of 21 or after case closing, whichever is longer, for minors. At least seven years after the child attains the age of 21, the record may be purged so that only family, medical and biographical information is retained. The family, medical and biographical information shall be

maintained for at least 15 years after the child reaches the age of 21, unless the child has been adopted, the family medical and biographical information on the child shall be maintained for at least 99 years after the child reached the age of 21.

9. Disposal of records after the above noted length of record retention has been achieved, will be disposed of in a manner that ensures the protection of privacy and confidentiality including use of a third-party shredding company which understands the confidential nature of the Children's Place Association's work.
10. If the agency ceases operations, the original or a completed copy of all child case records and licensing records for the children and families served and for the foster family and day care homes (if any) under supervision shall be provided to the Illinois Department of Children and Family Services.

Compliance:

1. Agency Policy
2. Title 89: Social Services
3. Chapter II IL Department of Children and Family Services, Subchapter E "Requirement for Licensure, part 401.270 Records Retention
4. COA
 - a. RPM 6.02