



DOCUMENT RETENTION POLICY

PURPOSE

Compliance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify or destroy any document with the intent of impeding or obstructing any official proceeding.

POLICY STATEMENT

The Early Learning Coalition of Pasco and Hernando Counties, Inc. (Coalition) acknowledges its responsibility to preserve information relating to litigation, audits and investigations. The Sarbanes-Oxley Act of July 30, 2002 makes it a crime to alter, cover up, falsify or destroy any document to prevent its use in an official proceeding. Failure on the part of employees to follow this policy could result in possible civil and criminal sanctions against the Coalition and its employees and possible disciplinary action against responsible individuals.

POLICY SECTIONS

Electronic Documents and Records: Electronic documents will be retained as if they were paper documents.

Emergency Planning: The Coalition's records will be stored in a safe, secure and accessible manner. Documents and financial files that are essential to keeping the Coalition operating in an emergency will be duplicated or backed up at least weekly and maintained off site.

Document destruction: Destruction of financial and personnel-related documents will be accomplished by shredding once it has been determined that the required retention period has been met. The Coalition will follow the document retention schedule as outlined in the Grant Agreement with Agency for Workforce Innovation. In addition, as stated in the Grant Agreement, the Coalition will abide by privacy measures of the Health Insurance Portability and Accountability Act (HIPPA) if applicable.

ROLES AND RESPONSIBILITIES

The Executive Director is responsible for ensuring compliance with this policy.

The Fiscal Manager is responsible for the ongoing process of identifying records which have met the required retention period and overseeing their destruction.

1st Reading: 4/17/08

Approved: 5/15/08